



Willow Public Charter School

412 W. Popular Street, Walla Walla, Washington 99362		
School Contact Information	(206) 494-5979	
School Website	https://innovationcs.org/	
District of Residence	Walla Walla	
Leadership	Dan Calzaretta	
School Mission	Prepare our diverse middle school population to excel in high school, college, and careers — and inspire students to improve their community and the world.	
	 Project-based learning: teachers will use project- based teaching methods to create meaningful and engaging projects for students. 	
	 Personalization: each student will have a Personalized Education Plan developed between the advisor teacher, the student, and the family, to meet the specific goals and needs of each student. 	
Education Program Terms & Design Elements	 Restorative discipline and trauma-informed teaching: using a restorative discipline model, students at Willow Public School will be suspended and expelled at rates lower than the average in the two middle schools in the Walla Walla district. 	
	 Extended school day for students: students will be in school from 40 minutes longer daily than the two middle schools in the Walla Walla District. Extended school year for students: students will be in session for 190 days (10 days longer than Walla Walla Public Schools). 	
Grades Served	6-8	
First Year of Operation	Yes	
Total Student Enrollment	114	

Student Demographics

STUDENT GROUPS		RACE / ETHNICITY	
Special Education	15%	American Indian / Alaskan Native	N/A
Limited English	15%	Asian	1%
Low Income	50%	Black / African American	NA
		Hispanic / Latino of any race(s)	44%
GENDER		Native Hawaiian / Other Pacific Islander	NA
Male	47%	Two or More Races	3%
Female	54%	White	53%

INTRODUCTION

The Organizational Performance Framework is a reporting tool designed to communicate to the charter school and the public the compliance-related standards that all charter schools authorized by the Washington State Charter School Commission (Commission) must meet. The Organizational Framework lists the standards which align to state and federal law, rules, regulations, and the charter contract that charter schools are required to meet.

PURPOSE OF REPORT

The Commission's Organizational Framework lays out the legal requirements for charter schools. It is designed to treat all charter schools as though they are the same only in terms of meeting minimum legal and ethical requirements. This enables charter schools to retain the flexibility and autonomy to be different in the ways that matter most for a school's mission, vision, and educational program. The expectations set out in the Organizational Framework derive from state and federal law as well as the operating terms in the charter application. Of the three frameworks, the Organizational Framework is most closely aligned with the charter contract in terms of documenting operational expectations such as special education, accounting practices, and reporting requirements.

One of the Commission's core responsibilities with respect to charter schools is to protect the public interest, and the Organizational Performance Framework is the primary lever for carrying out this responsibility. The framework enables the Commission to ensure that charter schools are respecting the rights of students, staff, and families within the schools as well as the interests of the general public in ensuring that charter schools meet the legal obligations that state and federal legislatures have determined should apply.

The central premise of charter school autonomy is that the authorizer will articulate the expected outcomes, and the school will have maximum flexibility to determine the best way to achieve those outcomes. In other words, the authorizer articulates the ends, and the school decides the means of getting there. The Organizational Performance Framework is the place where the school is held externally accountable for how it operates.

AT A GLANCE WILLOW PUBLIC CHARTER SCHOOL

Is Willow meeting legal obligations?

Ratings will be determined through the Commission's annual oversight activities as well as through the Commission's Pre-Opening and Annual Compliance Calendar. Additionally, the charter school board's signed assurances and school contract will be reviewed for evidence of compliance. Schools are obligated to comply with all state and federal public school reporting and compliance requirements as monitored by the Office of Superintendent of Public Instruction (OSPI) and the State Auditor's Office (SAO).

MEETS

Standard

The school materially meets the expectations outlined per state and/or federal laws, rules and regulations, or the charter contract.

DOES NOT MEET Standard

The school failed to implement the program in the manner described; the failure(s) were material and significant to the viability of the school, or regardless of the severity of the failure(s), the board had not instituted remedies that have resulted in prompt and sufficient movement toward compliance to the satisfaction of the authorizer.

WILLOW PUBLIC SCHOOL

These ratings provide clarity to schools about how decisions will be made, and which components of performance are most important. Additionally, ratings provide a "bright line" regarding charter school performance expectations that ensures consistency in Commission decision-making and supports parents as they navigate their public school options.

INDICATOR	MEASURE	RATING
	1a. Material Terms of the Charter Contract	DOES NOT MEET
1. Education	1b. Education Requirements	MEETS
Program	1c. Students with Disabilities Rights	MEETS
	1d. English Language Learner Rights	MEETS
2. Financial	2a. Financial Reporting & Compliance Requirements	MEETS
Management and Oversight	2b. Adherence to Generally Accepted Accounting Principles (GAAP)	MEETS
3. Governance	3a. Governance Requirements	DOES NOT MEET
& Reporting	3b. Management Accountability	DOES NOT MEET
	3c. Reporting Requirements	DOES NOT MEET
4. Students,	4a. Rights of Students	MEETS
Parents & Employees	4b. Recurrent Enrollment	NA
Limployees	4c. Teacher and Staff Credentials	MEETS
	4d. Employee Rights	MEETS
	4e. Background Checks	MEETS
5. School	5a. Facilities and Transportation	MEETS
Environment	5b. Health and Safety	MEETS
	5c. Information Management	MEETS
6. Other Obligations	6a. Mission-Specific Non-Academic Goal(s)	DOES NOT MEET

METHODOLOGY

1. EDUCATIONAL PROGRAM

MEASURE	THE SCHOOL DEMONSTRATES COMPLIANCE WITH THE FOLLOWING:	RATING
1a. Material Terms of the Charter Contract	The material terms of the education program in all material respects and the education program in operation reflects the terms as defined in the charter contract or subsequently approved amendments. This indicator measures the school's adherence to the education program terms and design elements in Attachment 4 of a school's charter contract.)	DOES NOT MEET
1b. Education Requirements	Applicable laws, rules regulations, and provisions of the charter contract related to education requirements and mandated programming as a result of state or federal funding.	MEETS
1c. Students with Disabilities Rights	Applicable state and federal laws, rules, regulations, and provisions of the charter contract relating to the treatment of students with identified disabilities and those suspected of having a disability.	MEETS
1d. English Language Learner Rights	Applicable state and federal laws, rules, regulations, and provisions of the charter contract relating to requirements regarding English Language Learners (ELLs).	MEETS

SCHOOL-SPECIFIC NARRATIVE

As verified by the Commission through its Quarterly School Reviews, first year site visit and board observations, Willow was noncompliant throughout the year with the implementation of its Education Program Terms. Following the Commission's first year site visit and subsequent investigation, Willow was subject to a Stay of Stipulation Agreement in part due to the lack of fidelity to the school's stated Education Program Terms. According to Attachment 4 of the charter contract, Willow had the following Education Program Terms:

- 1. Project-based learning
- 2. Personalization
- 3. Restorative discipline and trauma-informed teaching
- 4. Extended school day for students

Not only did the school fail to implement the stated Educational Program Terms, they also failed to notify the Commission regarding the lack of compliance with their charter contract. This resulted in the school being placed under a *Stipulation and Stay of Revocation Agreement* between the school and the Commission. The Commission's rating for indicator 1a is "does not meet" due to the school being placed under this agreement in part because of failure to adherence to the education program terms and design elements found in the charter contract.

The State Auditor's Office (SAO) issued no findings in its <u>Accountability Audit Report</u> regarding the implementation of mandated programming as a result of state or federal funding. The SAO report investigated the following areas:

- Banking Debit Card Transactions
- Travel reimbursements to contracted consultants Support for payments
- Vendor contracts Support for payments
- Use of restricted funds Professional Learning Allocation expenditures
- Student enrollment reporting review for student eligibility in basic education
- Student transportation reporting review for student ridership counts that drive funding
- Open public meetings documentation of minutes, executive sessions, and expenditure approvals
- Electronic Funds Transfers (EFT) controls over disbursements
- Subfunds establishment of revenue and expenditure accounts

The SAO report noted: "Public School operations complied, in all material respects, with applicable state laws, regulations, and its own policies, and provided adequate controls over the safeguarding of public resources." Furthermore, the Commission found no violations of laws, rules, regulations, or provisions of the charter contract related to education requirements (e.g. instructional days or minutes requirements, promotion requirements, Content standards, including Common Core and State assessments as outlined in the Statement of Assurances) and mandated programming as a result of state or federal funding.

SCHOOL COMPLIANCE WITH PROTECTING THE RIGHTS OF STUDENTS WITH DI	SABILITIES
Equitable access and opportunity to enroll	✓
Identification, location, and evaluation of students who may be eligible for special education	1
Provision of a Free and Appropriate Public Education in the least restrictive environment	1
Provision of procedural safeguards to students with disabilities and their families	✓
Identification, location, and evaluation of students who may be eligible for 504 Plans	1
Provision of services and accommodations under Section 504	1

OSPI released the results of its Washington Integrated Sub-recipient Monitoring (WISM) review. The goal of the review is to promote special education program effectiveness and to ensure each school meets its state supervision and oversight requirements for special education programs under state and federal law. Willow received a determination of "Needs Assistance" of the Individuals with Disabilities Education Act (IDEA) for Part B. District may receive recommendations for improvement in certain areas of need as identified by OSPI. Areas that require further action are noted below.

Willow conducts meetings with parents and appropriate personnel to determine acceptance of transfer Individualized Education Plans (IEP) and provision of comparable services or the need to revise the IEP based on a review of current data. Willow uses a Student Support Team (SST) process to refer and evaluate students suspected of having a disability and needing services and accommodations or special education. This process includes appropriate team participation to include the parent. The school ensures that evaluations are sufficient in scope to develop an appropriate Section 504 or IEP. To develop plans, Willow completes a review of existing data from comprehensive evaluations. As needed, Willow provides instructional support and services to students with special needs and provides accommodations and modifications for diverse learners. The school ensures procedural safeguards for students and families as evidenced in timely notifications and conducts necessary progress monitoring activities. Willow provides the least restrictive placements that address students receiving the maximum access to the general education setting with their typical peers. Current placement services include full inclusion, push-in services, and pull-out services, and individual and small group instruction from the special education teachers and related service personnel. Ancillary services include student support counselors and associate teachers to support the academic and behavior needs of students with learning challenges.

During the 2018-19 OSPI WISM review, it was noted in review of area of IEP Implementation that one of the IEP files reviewed lacked information "identify[ing] the frequency, location, and duration for each of the special education and related service areas the student was receiving," and follow up action was required to remedy the issue. The school corrected the concern within the OPSI identified time frame. The Commission's rating for indicator 1c is rated as a "meets" due to the responsiveness of the school/board to resolve the OSPI required action.

Willow ensures students who have been removed from classes for disciplinary reasons receive appropriate services, manifestation determinations, functional behavior assessments, and behavior intervention plans as needed.

SCHOOL COMPLIANCE WITH PROTECTING THE ENGLISH LANGUAGE LEARNINER (ELL) STUDENTS	
Removal of barriers to the enrollment and retention of ELL students	<
Communicates with all English learners in a language they can understand	1
Provides English language development services to English language learners (ELL)—national original minority students	

Willow uses a home language survey in its enrollment packet to determine families who need information in a language other than English. The school provides qualified and competent adult interpreters to communicate with parents of English Language Learners (ELLs) at events and translate vital documents as needed or requested.

Willow has a process to identify, assess, and place ELL students in classes that include a home language survey and provisions for testing students on the state language proficiency assessment. The school administers the Washington English Language Proficiency Assessment (WELPA) to determine English proficiency and provides on-going progress monitoring of academic performance. The school's English language development services are based on sound educational theory and have been implemented effectively, including qualified staff and adequate resources and facilities. The school measures the effectiveness of the ELL program through grade level and team data analysis and makes modifications as needed. The school ensures ELL services through a full-inclusion model. Professional development has been documented for all staff on ELL assessment administration and strategies for vocabulary instruction.

SCHOOL RESPONSE: Willow PS underwent a significant reform process in the summer of 2019. This included rewriting all curriculum to comply with the terms of the charter contract. Staff received over 10 days of professional development between April 2019 and August of 2019 to support teacher's understanding and implementation of the program terms as stated in the charter contract.

DATA SOURCES: Attachment Four of the Charter Contract; Stipulation and Stay of Revocation Agreement; Charter contract amendment(s); board meeting agendas/minutes/packets; Commission board meeting observations; Commission Site Visit Report; Academic Calendar; Statement of Assurances within Charter Contract; Pre-Opening Conditions Calendar submissions; State Auditor's Office (SAO): Accountability Audit, Office of Superintendent of Public Instruction (OSPI): Washington Integrated System of Monitoring (WISM)

2. FINANCIAL MANAGEMENT AND OVERSIGHT

MEASURE	THE SCHOOL DEMONSTRATES COMPLIANCE WITH THE FOLLOWING:	RATING
2a. Financial Reporting and Compliance Requirements	Applicable state and federal laws, rules, regulations, and provisions of the charter contract relating to financial reporting and compliance requirements. All policies and requirements issued by the Office of Superintendent of Public Instruction and Washington State Auditor's office concerning accounting for public school districts in the state of Washington.	MEETS
2b. Adherence to Generally Accepted Accounting Principles (GAAP)	Applicable state and federal laws, rules, regulations, and provisions of the charter contract relating to financial management and oversight expectations as evidenced by an annual independent financial audit.	MEETS

SCHOOL-SPECIFIC NARRATIVE

Willow maintained compliance with its financial reporting and compliance requirements to the Commission, OSPI, and the SAO. All charter schools, authorized by the Commission, have an annual requirement to submit an independent financial audit. These independent financial audits are also reviewed by the SAO.

During the 2018–19 OSPI WISM review, the school's documentation submitted as part of the WISM review with the 2018–19 S-275 Personnel Report (dated December 18, 2018) and noted that the special education teacher was reported as paid from Program 29. The school corrected the program code to which the special education teacher is assigned and submitted a copy of the corrected S-275 report to OSPI. The Commission's rating for indicator 2a is rated as a "meets" due to the responsiveness of the school/board to resolve the OSPI required action.

The school's independent auditors, <u>Edie Bailly LLC</u>, issued an unmodified report that identified no material weaknesses, reported no significant deficiencies, and noted no areas of noncompliance material to the financial statements. The SAO audit, in review of the independent audit, states, "We did not become aware of any instance in which the work of the other auditors gave rise to concern about the quality of their work."

SCHOOL RESPONSE: A response was not provided by the school.

DATA SOURCES: Quarterly Financial Report(s); Annual Budget; Annual Independent Financial Audit

3. GOVERNANCE AND REPORTING

MEASURE	THE SCHOOL DEMONSTRATES COMPLIANCE WITH THE FOLLOWING	RATING
3a. Governance Requirements	Applicable state and federal laws, rules, regulations, and provisions of the charter contract relating to governance by its board.	DOES NOT MEET
3b. Management Accountability	Applicable state and federal laws, rules, regulations, and provisions of the charter contract relating to oversight of the school management team.	DOES NOT MEET
3c. Reporting Requirements	Applicable state and federal laws, rules, regulations, and provisions of the charter contract relating to relevant reporting requirements to the Commission, state, and federal authorities.	DOES NOT MEET

SCHOOL-SPECIFIC NARRATIVE

• 6 members • 3 members required for quorum • The Willow board meets monthly • No fewer than 3, but no more than 11 directors allowed

The Willow Board did not maintain compliance with its governance requirements. Willow's school board did not abide by the provisions of the charter contract relating to governance by its board. At the beginning of the 2018–19 school year, Willow Public School had six members on its board of directors. During the school year, five members resigned, and two joined with one consequently resigning. Willow Schools', bylaws require a minimum of three board members. "In June, the Board composition dropped below the three-board member minimum and the School's structure remains out of alignment with the application and bylaws." This was verified by both the Commission through its board meeting observations, first year site visit, Stipulation and Stay of Revocation Agreement, and review of meeting materials. The Commission's rating for indicator 3a is rated as a "does not meet" due to the school being placed under the Stipulation and Stay of Revocation Agreement process in part because of failure to adherence to the school bylaws found in the charter contract.

The Willow Board did hold all meetings in accordance with the Open Public Meetings Act, adhered to the rules and regulations of the Public Records Act. The Board met monthly. However, the Board failed to demonstrate effective and transparent management of the school including the School's leadership oversight. The Board's turnover lead to a failure in the ability to identify issues within the school

management team, taking corrective action, and implementing any corrective actions imposed. These actions were taken, via the *Stipulation and Stay of Revocation Agreement*, by the Charter School Commission after an investigation found that Willow's board has failed to ensure that it satisfied its obligations under the charter contract. Part of the *Stipulation and Stay of Revocation Agreement* mandated a board development plan that included the following items:

- 1. The School must submit a board development plan. The plan must identify each individual/group responsible for each aspect of the plan along with a calendar showing the dates, times, and length of each board training.
- 2. The Board must develop a rubric for tracking contractual and legal compliance at the school and link its Board agenda items to the rubric.
- 3. The Board must have members that collectively possess expertise regarding finance (non-profit and public school), education (specific to the School's educational model and grades served), and governance/non-profit management.

The Commission's rating for indicator 3b is "does not meet" due to the school being placed under the *Stipulation and Stay of Revocation Agreement* process in part because of failure of the Willow School Board to demonstrate effective and transparent management of the school and failure to comply with the school's charter contract and which resulted in *Stipulation and Stay of Revocation Agreement*.

The school maintained compliance with the traditional reporting requirements to the Commission, submitting on time reports for the school year. However, the school failed on multiple occasions to notify the Commission staff in instances when a deficiencies or concerns arose at the school in a timely manner. The school also failed to implement the Educational Program Terms, which Willow is contractually obligated to provide under Charter Contract Section 5.21(b)(1) and failed to notify the Commission immediately when they were unable to deliver these terms or were otherwise out of compliance with their contractual obligations (Section 5.21(b)(2)). This resulted in the school being placed under a *Stipulation and Stay of Revocation Agreement* between the school and the Commission. The Commission received no reports from state or federal entities regarding late or inaccurate compliance submissions. The Commission's rating for indicator 3c is "does not meet" due to the school being placed under this agreement in part because of failure to adherence to notifications to the Commission of being out of compliance with their contractual obligations.

SCHOOL RESPONSE: The Board of Directors submitted a board development plan in June of 2019 and followed the plan with fidelity. A rubric is used at board meetings to support the board with tracking compliance. There are currently six board members.

DATA SOURCES: Commission board meeting minutes; board observations; Annual Compliance Calendar; SAO: *Accountability Audit; Stipulation and Stay of Revocation Agreement*

4. STUDENTS, PARENTS, AND EMPLOYEES

MEASURE	THESCHOOL DEMONSTRATES COMPLIANCE WITH THE FOLLOWING:	RATING
4a. Rights of Students	Applicable state and federal laws, rules, regulations, and provisions of the charter contract relating to the rights of students.	MEETS
4b. Recurrent Enrollment	Number of students continuing to be enrolled in the school from one year to the next is expressed as a percentage of the total number of students eligible to continue their enrollment at the school.	NOT APPLICABLE
4c. Teacher and Staff Credentials	Legal obligations for public schools to employ appropriately qualified and credentialed staff, including administrative, teaching, and educational support staff as required by law.	MEETS
4d. Employee Rights	Applicable state and federal laws, rules, regulations, and provisions of the charter contract relating to employment considerations.	MEETS
4e. Background Checks	Applicable state and federal laws, rules, regulations, and provisions of the charter contract relating to background checks of all applicable individuals (including stand and members of the charter community, where applicable).	MEETS

SCHOOL-SPECIFIC NARRATIVE

SCHOOL COMPLIANCE WITH ADMISSIONS AND ENROLLMENT PRACTICES	
No limits to admission on any basis other than age group, grade level, or enrollment capacity	1
No tuition charged	✓
Follows lottery enrollment laws	✓
Does not inquire about a student's special education status during the application process	1
Accepts a variety of documents to establish a student's age and residency	1
Does not inquire about a student or parent's U.S. citizenship status or immigration status	1

The Willow had assigned staff members to fulfill its responsibilities under Section 504, Title IX, McKinney-Vento, Foster Care, and state nondiscrimination laws. Each of the coordinators received training regarding their responsibilities. Willow included a nondiscrimination statement in all major school publications widely disseminated to students, parents, and employees and on the website.

The school posted its sexual harassment policy and educational rights of homeless children and youth in accessible locations of the school's campus. The Commission verified that the school adopted discrimination complaint and appeal procedures and sexual harassment policies and procedures that are consistent with the requirements in state law. Willow has formalized methods of data collection and analysis as well as the ability to implement effective interventions throughout the year regarding discrimination, program enrollment and discipline of students across subgroups. The school has a process for auditing instructional materials to evaluate and eliminate bias pertaining to a protected class in all textbooks and instructional materials.

Willow has removed barriers to the enrollment and retention of all students. Its application is available on its website and campus. The school follows admissions and enrollment practices outlined in RCW 28A.710.050 (not limiting admission on any basis other than age group, grade level, or enrollment capacity; not charging tuition; following lottery enrollment laws; revising enrollment capacity annually to facilitate the academic success of its students). Willow includes a Student Housing Questionnaire in its enrollment packet and consists of a comprehensive Homeless Student Policy in its Family Handbook. The school identified a Foster Care/McKinney-Vento Liaison responsible for enrollment, accommodations, and transportation for eligible students and coordination of services with community agencies and entities.

Willow was not evaluated on recurrent enrollment because this was the first year recurrent enrollment was calculated, and no targets had been set.

The State Auditor's Office (SAO) issued no findings in its <u>Accountability Audit Report</u> regarding teacher and staff credentials as tested through its evaluation of staff mix compliance.

As verified through compliance submissions based on the Annual Compliance Calendar, the Commission identified no areas of non-compliance related to employment considerations or background checks.

SCHOOL RESPONSE: A response was not provided by the school.

DATA SOURCES: Commission Site Visit Report; SAO: *Accountability Audit*; Pre-Opening Conditions; Student Handbook; Employee Handbook; OSPI: *WISM*

5. SCHOOL ENVIRONMENT

MEASURE	THE SCHOOL DEMONSTRATES COMPLIANCE WITH THE FOLLOWING:	RATING
5a. Facilities and Transportation	Applicable state and federal laws, rules, regulations, and provisions of the charter contract relating to the school facilities, grounds, and transportation.	MEETS
5b. Health and Safety	Applicable state and federal laws, rules, regulations, and provisions of the charter contract relating to safety and the provision of health-related services.	MEETS
5c. Information Management	Applicable state and federal laws, rules, regulations, and provisions of the charter contract relating to maintaining and handling information appropriately.	MEETS

SCHOOL-SPECIFIC NARRATIVE

The State Auditor's Office (SAO) issued no findings in its <u>Accountability Audit Report</u> regarding transportation.

Willow's facility met all health and safety code requirements, maintained compliance with legal obligations for providing student transportation, and offered a safe environment conducive to learning. The facility's design, size, maintenance, security, and equipment were all adequate to meet the school's needs. The school was accessible to all, including people with physical disabilities.

Willow submitted all required safety plans during the pre-opening process and provided evidence that lockdown and fire drills were conducted.

Willow maintained compliance with public records requirements, proper and secure maintenance of student, governance, and finance records, rules, and regulations regarding transferring of student records. The school follows adequate safety and security procedures to ensure a safe testing administration. Willow has identified an Assessment Coordinator who provides training to all staff.

SCHOOL RESPONSE: A response was not provided by the school.

DATA SOURCES: Commission Site Visit Report (if applicable), SAO: *Accountability Audit*, Pre-Opening Conditions, USDA: *Administrative Review*, Commission Annual Compliance Submission(s)

6. MISSION SPECIFIC NON-ACADEMIC GOALS

MEASURE	THE SCHOOL DEMONSTRATES COMPLIANCE WITH THE FOLLOWING	RATING
6a. Other Obligations	Mission-specific non-academic goal(s) The results of the survey will show scholars are connected and supported at Willow Public School. 75% or more of respondents will answer favorably to all questions.	DOES NOT MEET

SCHOOL-SPECIFIC NARRATIVE

Each year, Commission authorized charter schools set mission-specific non-academic goals that are aligned to or support the school's unique mission. All data for mission-specific goals are self-reported by the individual school.

Willow developed mission-specific non-academic goals that were approved by the Commission. The non-academic goal was, "The results of the survey will show scholars are connected and supported at Willow Public School. 75% or more of respondents will answer favorably to all questions." The cohort surveys indicated that less than 75% of students answered favorably to all questions this resulted in the rating of does not meet.

SCHOOL RESPONSE: New school programming and a focus on student culture provided greater opportunities for students to be supported at Willow. Student enrollment has maintained for the past two years demonstrating that students feel connected and supported at their school.

DATA SOURCES: Mission-Specific Non-Academic Goal



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