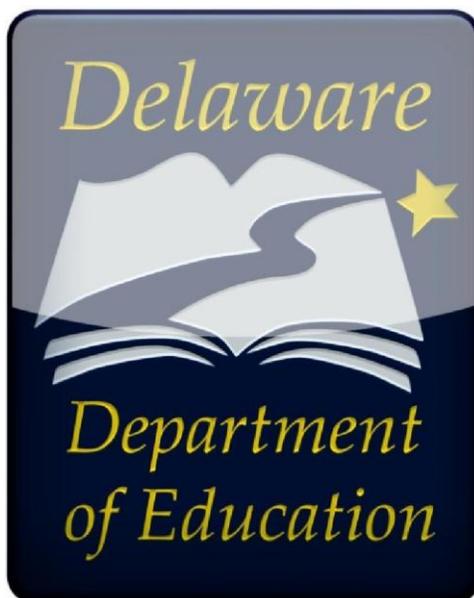


**CHARTER SCHOOL ACCOUNTABILITY COMMITTEE  
DELAWARE DEPARTMENT OF EDUCATION**



**DELAWARE MET HIGH SCHOOL**

**PRELIMINARY REPORT AND RECOMMENDATIONS**

**APPLICATION TO OPEN A CHARTER SCHOOL**

Opening Date: August 2014

Grades: 9 - 12

Location: New Castle County

Date of Report: 22 March 2013

## Background

Name	Delaware Met High School		
Projected Enrollment	Year 1	264(planned), 264 (max), grades 9, 10	
	Year 2	396 (planned), 396 (max), grades 9, 10, 11	
	Year 3	528 (planned), 528 (max), grades 9 - 12	
	Year 4	528 (planned), 528 (max), grades 9 - 12	
Mission	To ignite the passions of high school students through the discovery and development of their unique interests; to empower students to develop self-confidence and create their own success through a personalized learning environment and purposeful internships of their choice; and, with the support of advisors and community partners, graduate as confident and capable young adults, prepared to make their mark on the world!		
Vision	<p>To provide each student with:</p> <ul style="list-style-type: none"> <li>• A highly personalized learning experience defined by a Personalized Learning Plan, daily advising, internship mentoring, and rigorous academics based on student interests;</li> <li>• A guiding partnership among students, parents, advisors, mentors, colleagues, and the community that provides a learning context appropriate to student interests;</li> <li>• Learning experiences and hands-on projects that guide learning across all content areas and support depth over breadth;</li> <li>• Opportunities for students to participate in real-world learning through internships and training related to their interests and goals;</li> <li>• A vibrant, flexible learning environment that provides equal access to all students by customizing instruction to address unique student learning styles, abilities, and interests; and,</li> <li>• Graduation with a high school diploma, a post-high school plan, and the skills needed for success throughout college and in real-world careers.</li> </ul>		

Members of the Charter School Accountability Committee (Committee), met with representatives from Delaware Met High School (Delaware Met) on January 24, 2013 for the Initial Meeting and on February 7, 2013 for the Preliminary Meeting. The Committee discussed each of the nine criteria of the application.

## Founding Group and School Leadership

The Committee discussed the response to the Founding Group and School Leadership section in the application and noted the following at the Preliminary Meeting.

- Diverse board with broad range of experiences – facilities, school finance, school leadership
- Experience serving target population (Wilmington Urban League)
- Members are heavily invested in the Wilmington area, including residents and business owners

- The school leader for the Delaware Met has not yet been identified. The founding group included a sample job description and selection timeline.

***The Accountability Committee concluded that the applicant's response to the "Founding Group and School Leadership" section met the standard.***

## Education Plan

The Committee discussed the response to the Education Plan section in the application and noted the following.

### *Curriculum and Instructional Design*

#### **English / Language Arts-Meets Approval**

- The Scope and sequence shows alignment of instruction to standards and includes elements of the Common Core Curriculum Maps put out by [CommonCore.org](http://CommonCore.org)

#### **Mathematics- Meets Approval**

- All content has been aligned to the Common Core State Standards for Mathematics.
- Units of instruction have been accessed from IMP curricular resources.

#### **Science- Meets Approval**

- While the school provided a comprehensive scope and sequence adequately describing plans for implementation and the school provided plans for participation in the Science Coalition, it is unclear how this will occur. Who will attend Coalition meetings? What is the timeline for staff development and who will be responsible for coordinating these efforts?
- As plans for the school building progress please keep in mind Regulation 885-Chemical Safety and Storage.

#### **Social Studies- Meets Approval**

- Delaware MET follows a scope and sequence that aligns with the intent of the Delaware Recommended Curriculum.

#### **Health Education-Meets Approval**

- The Scope and sequence shows alignment of instruction to standards.
- Future curriculum development and creation of units of instruction should focus on Health for Personal Power. Curricular resources may be found at [http://www.doe.k12.de.us/infosuites/staff/ci/content\\_areas/health.shtml](http://www.doe.k12.de.us/infosuites/staff/ci/content_areas/health.shtml)

#### **Physical Education- Meets Approval**

- The Scope and sequence shows alignment of instruction to standards.
- Future curriculum development and creation of units of instruction should focus on P.E: Fit for Life. Curricular resources may be found at [http://www.doe.k12.de.us/infosuites/staff/ci/content\\_areas/phys\\_ed.shtml](http://www.doe.k12.de.us/infosuites/staff/ci/content_areas/phys_ed.shtml)
- Assessment should include Fitnessgrams.

**World Languages- Meets Approval**

- Only Spanish 1 curriculum is provided. As a high school, there should be at minimum two levels of world language curriculum in order for students to meet the DE graduation requirement.
- Unit concepts should not focus exclusively on grammar topics but rather on how those grammar structures serve communicative language functions.
- Performance tasks should be included in each unit of instruction, not selected units, since language learning is focused on knowing how to use language and not simply knowing about language.

**Visual & Performing Arts-Meets Approval**

- Comprehensive scope and sequence documents are evident for Art Appreciation and Drawing including aligned learning targets, and formative and summative assessment measures. The school plans to utilize models units of instruction from the Delaware Recommended Curriculum. The Art Appreciation scope and sequence includes opportunities for art making as well as a focus on art history.
- Comprehensive scope and sequence documents are evident for Music Theory and Introduction to Music including aligned learning targets, and formative and summative assessment measures. Introduction to Music includes learning opportunities to contrast music genres such as Ragtime, Blues, Jazz and Rock.

**Professional Development-Meets Approval**

- Plans are evident for professional development for the school leader and advisors for Big Picture Learning and the school culture. Additional timeline and structures for other staff members are evident in section D-2. Professional Development reflects researched based best practices and ongoing professional development for staff over time.

**Technology- Meets Approval**

- As stated by the school “Technology will be used as an essential learning tool to personalize the educational experience and to promote independent learning.” Specific examples included student use of Googledocs and Edmoto.
- A comprehensive plan for the use of technology as tools for instruction, curriculum development and assessment was provided in Appendix B-5.

*Student Performance Standards*

- A complete checklist of expectations is provided in attachment six and narrative descriptions of promotion based upon completion of these expectations is consistent.
- **Response Required:** Provide generic rubrics and/or outlines of expectations that may align with some of the listed expectations found in the checklist. It is cumbersome, from an external point of reference, to imagine the activities and products referenced in this list and to ascertain whether the expectations are reasonable.

The Exit Standards for students at the Delaware Met, which are defined in Attachment 6, clearly articulate the high expectations for the students who will attend the school. While the clear articulation of the Exit Standards/Annual Expectations creates a lengthy list, they are similar to

what most Delaware High Schools expect of their best students: successfully completing academic coursework, taking the SAT, applying to colleges, completing community service hours and a senior project, reading books outside of English class, completing a Student Success Plan, and conducting themselves respectfully with positive influence and ambition to pursue their goals. Additional expectations are specific to the Big Picture Learning Model, such as the Learning Through Interest Internship (LTI), the autobiography, and exhibitions of learning. With these Annual Expectations clearly articulated, each advisor works with the students in his/her advisory to embed these expectations into the students' Personalized Learning Plan (PLP). While some of the Annual Expectations are items which can be checked off of a list, such as the completion of community service hours, those expectations that require a measure of quality will be guided by rubrics that will be fully developed when the advisors are hired during the planning year. All rubrics will be aligned to Common Core and Delaware State Standards, as appropriate. Attached as Appendices 1-A through H are sample rubrics from across the Big Picture Learning Network that provide examples of how some of the Annual Expectations will be evaluated.

### *High School Graduation Requirements*

#### High school graduation requirements:

- The applicant has partially addressed the graduation requirements required in 14 DE Admin. Code 505, section 4.0. A concern is that the course titles required by this regulation for the graduation class of 2016 (freshman class of 2012-13) are not identified specifically.
- **Response Required:** Specifically articulate your understanding of 14 DE Admin. Code 505, section 4.0.

It is the understanding of the Delaware Met Board that to earn a State of Delaware Diploma, students must earn, at minimum, four (4) credits in English Language Arts, four (4) credits in Mathematics, three (3) credits in Science, three (3) credits in Social Studies, two (2) credits in a World Language, one (1) credit in physical education, one half (1/2) credit in health education, three (3) credits in a Career Pathway, and three and one half (3 ½) credits in elective courses.

All course titles articulated in 14 DE Admin. Code 505, section 4.0, with the exception of English II and United States History, are currently reflected the Delaware Met course titles, and are aligned to the content and grade appropriate standards. The educational program for the Delaware Met values an integrated, project-based curriculum; therefore English language arts and social studies will be taught together as an integrated, humanities curriculum. To ensure that all of the standards for grade 10 English language arts and social studies will be met, separate, but thematically linked, curriculum maps for English and social studies were developed for the Delaware Met and submitted with the application. As indicated elsewhere in the Preliminary Report, these curriculum maps have been vetted and approved by the education associates for English and social studies.

If it is the recommendation of the Charter School Accountability Committee that the Delaware Met could increase compliance with 14 DE Admin. Code 505, section 4.0, by revising the course titles to include English II and United States History, the following revisions could be made to the course sequence and Course Description Handbook.

Grade 9	Humanities 1: English I, Geography, and Civics
Grade 10	Humanities 2: English II and Economics
Grade 11	Humanities 3: English III and U.S. History
Grade 12	Humanities 4: English IV and World History

The changes to the course titles would not change the curriculum maps or the integrated pedagogical approach within the humanities course, but would clearly articulate the academic content of the course.

Meeting career and technical education requirements: The applicant does not plan to apply for state or federal CTE funding; however the applicant should understand that *Career Pathways-Learning Through Interest* does not currently meet CTE requirements. Therefore, if in the future a decision is made to apply for CTE state and federal funding then the charter school would be responsible for applying for CTE course and/or pathway approval through the CTE course and/or pathway approval process.

College and career readiness: graduation requirements include students taking the SAT, researching, visiting, interviewing, and applying to at least four colleges. Advisory class is where most of this work will occur. The response is acceptable.

Student Success Plans: Success plans will be completed through advisory class. The response is acceptable.

### School Calendar

- School Calendar: A complete and comprehensive school calendar was provided including school days, holidays, professional days for teachers and student exhibition days and Summer Success Programs for new students. While 15 staff development days are planned only one occurs during the school year and the remainder occurring in June and August.
- School Schedule: The school schedule was broken out for grades 9-12 and identified specific features of the school including: *Pick Me Up*, *Advisory*, *Beyond the Bell*, *Learning through Interests*, and an integrated Humanities course.

### School Schedule

- The school will use a modified block schedule that provides the flexibility needed for a studio-based curriculum.

### School Culture

- Due to recent legislative and model policy changes, sections of the sample bullying prevention policy need to be revised. See Appendix B for more information.

Please see Appendix B-11 for a revised Bullying/Cyberbullying/Anti-Hazing Prevention Policy.

### *Supplemental Programming*

Due to limited funding Delaware Met will only offer summer school to students who specifically need Extended School Year services. The school states that clubs can be formed and sports teams can be fielded based on student interest. Additionally, students will be encouraged to find opportunities such as community workshops and classes, along with classes at community colleges to enhance and advance their learning.

**Response Required:** What models for supplemental programming have been used by other Big Picture Schools?

Across the Big Picture Learning network, schools utilize a variety of strategies to supplement the school's programming. Supplemental programming is based on the interests and needs of the students. These range from:

- Conducting a "traditional," five week summer school program where students attend four days a week and instruction is delivered through a project-based approach.
- Coordinating Summer Intensive Learning Through Internship experiences and independent projects that are monitored and assessed by summer school advisors and evaluated through an exhibition prior to the new school year beginning.
- Working with social workers and social work interns to provide socio-emotional support to students and coach advisors through some of the more sensitive student challenges.
- Supporting student inspired clubs and organizations where students are encouraged to start the groups, identify a faculty member that would be their club/organization's faculty member, fundraise, and govern the club.
- Partnering with local organizations to support the school and students in a variety of ways, based on the academic program and/or the needs of the students. The support may be for one student, such as in a mentoring or tutoring relationship or for groups of students. Some partnerships may be programmatic and/or academic in nature, while others may be for enrichment. Other partnerships may focus on students' developmental needs.
- Seeking support from specific organizations to assist students in traditional or creative ways with anger management, general counseling, eating disorders and others that may come up with the population of students the Delaware Met intends to serve.

Supplemental programming across Big Picture Learning schools is varied because students are different and have different needs and interests. Through the advisory structure, all students will be well known by their advisor, who will work collaboratively with the students, other professionals and educators in the building, and community partnerships, as needed or required, to develop supplemental programming.

### *Special Populations at At-Risk Students*

#### **Students with Disabilities**

**Response Required (see below):**

- The plan states that students must reach Tier III of the RTI process before they can be referred for a special education evaluation. Under the IDEA, students are not required to participate in the RTI process before being evaluated to determine eligibility for special education.

In addition to the RTI process outlined in the charter application which may result in an evaluation to determine eligibility for special education, the Delaware Met parents or guardians who have specific concerns about the academic progress of their child may request in writing that a psychological evaluation of the child be conducted to determine their eligibility for special education services. In addition, educational professionals at the Delaware Met who suspect that a child has a disability may bring these concerns, along with data gleaned from assessments and research based intervention practices, to the Instructional Support Team (IST) for their review and evaluation referral.

Once results of the evaluation are made available, the teachers, parents, school administrator, psychologist, and student will meet to discuss the results of the evaluation and determine whether or not, based on the recommendations of the psychologist and collected data from the IST, the student is eligible for an Individualized Education Plan (IEP). This same team will meet to craft that plan, taking into account Evaluation Summary recommendations, student performance data against grade level expectations and outcomes, as well as student college and career aspirations for appropriate transition planning.

- The plan does not adequately describe how the school will provide a continuum of educational placements for students with disabilities, including students who may not participate in the general education setting for part or all of the school day.

The Delaware Met will hold stoutly to the following IDEA principles:

- Special education is a service, not a place;
- All students with disabilities will have access to the general education curriculum;
- A broad range of services will be provided, addressing the needs of all students with disabilities;
- IEP teams will first consider providing each student services in the general education classroom, with supplementary aids and services appropriate to that student's needs;
- A continuum of options will be provided that vary in the extent to which they provide education for a student with a disability alongside his/her non-disabled peers;
- Parents will have full access to a system of procedural and substantive rights and assurances that they are informed participants in educational decision-making--concerning both the services provided and the setting they are provided in--for their children.

For those students who are likely to succeed with the help of well-designed, carefully implemented and rigorously assessed general education interventions, special education services will be delivered in the general education classroom. Where services delivered in the general education classroom are not likely to result in student success, a continuum of alternative options will continue in the form of special classes (either full or part-time) within the school or, special classes full-time in specialized school settings. Regardless of the school setting, appropriate services will be provided for all students with disabilities, and at all times, the Delaware Met will comply with DE code 14 Del.C. §3110 for definitions of least restrictive environments and will provide the following the continuum of placements to students<sup>1</sup>.

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<sup>1</sup> Note that the listed codes and definitions were identified in consultation with Mary Ann Mieczkowski.

*Following the development of a child's IEP, the team shall determine the child's educational placement in the least restrictive environment based on the child's individual needs and the services identified in the IEP (Reg. 27.1).*

Educational placement options shall include, but not be limited to, the following:

### Services in the General Education Classroom

*27.1.1 Inside Regular Education Class >=80 percent of the day: Children with disabilities receiving special education and related services outside the regular classroom less than 21 percent of the day. This may include children with disabilities placed in: regular class with special education related service provided within regular classes; regular class with special education related services provided outside regular classes; or regular class with special education services provided in resource rooms.*

At the Delaware Met, general education class services with supplementary aids and services, when needed, will be conducted in conjunction with related services, special education teacher support services, and collaborative team teaching. Based on the needs of the student and his/her IEP, the continuum of services within the regular classroom could include any of the following:

1. Instructional Adaptations:
  - Changing the manner in which information is presented, paced, or sequenced
  - Structuring support through a co-teaching model
  - Incorporating flexible grouping and instructional practices such as cross-age tutoring, heterogeneous grouping, and/or peer partnerships
2. Curriculum Accommodations:
  - Changing how a student accesses information and demonstrates learning without substantially changing the instructional level, content or the performance criteria.
  - Using assistive technology, such as audio tapes instead of books, large print books, Braille materials, calculators, and/or word processors.
  - Providing individualized supports, such as the rephrasing of questions and instructions, testing modifications, and providing curricular aids such as highlighted reading materials, main idea summaries, organizational aids, pre-written notes, and/or study guides
  - Allowing additional time to move between classes; special seating arrangements; testing modifications
3. Curriculum modifications:
  - Changing what a student is expected to learn and demonstrate when participating in the general education curriculum
  - Changing the instructional level, the content and the performance criteria. While the student works on a modified course content, the subject area remains the same as the rest of the class
  - Redesigning the size, breadth or focus of the assignment
4. Behavior Intervention/support plans
  - Addressing behaviors that impede learning through structured feedback loops that are appropriately timed based on the needs of the students

### Part-time or Full-time Special Education Classes/Services

*27.1.2 Inside Regular Class <= 79 percent of the day and >= than 40 percent of the day: Children with disabilities receiving special education and related services outside the regular classroom for at least 21 percent of the day and no more than 60 percent of the day. This may include children placed in: resource rooms with special education related service provided within the resource room; or resource rooms with part time instruction in a regular class.*

At the Delaware Met, students who have an IEP indicated placement of inside the regular education classroom between 40% and 79% of the day will receive necessary classroom accommodations and modifications as mandated within their IEP when they are in their general education classroom(s). Part time or full time special education classes/services will also be delineated within the student's IEP as to which environment/setting will allow students the appropriate access to the general curriculum when the needs of the student are of an intensity that cannot be met within the regular education classroom. This can include part-time resource support, or resource room with part time instruction within a student's regular, general education class.

*27.1.3 Inside Regular Class < 40 percent of the Day: Children with disabilities receiving special education and related services outside the regular classroom for more than 60 percent of the day. This may include children placed in: self-contained special classrooms with part time instruction in a regular class; or self-contained special classrooms with full time education instruction on a regular school campus.*

Also an educational setting, for those students who are in need of a specialized setting, special classes full-time in specialized school settings will be provided when it is deemed by the IEP team that it is educationally justifiable and/or medically relevant.

### Supplemental or Out of School Special Services

*27.1.6 Homebound and Hospital: Receives education programs in homebound hospital placement. Includes children with disabilities placed in and receiving special education and related services in: hospital programs, or homebound programs.*

This range of services is broad but it is not static for any individual student. As student progress is assessed, attention will be paid to the needed services, ensuring provision of services in the least restrictive environment. Each time an IEP is developed for a student (e.g., as part of the initial evaluation, at annual reviews, and/or at other re-evaluations), general education with needed supplementary aids and services will be considered as an option. Decertification of students no longer in need of special education services will also be considered. Again, all decisions regarding placement at the the Delaware Met will be educationally justifiable based on data collection, advisor, student and parent input, as well as psychological recommendations per results of educational testing.

- The plan does not adequately describe how staff will be trained and monitored regarding the implementation of special education regulations, to include the provision of a free, appropriate public education to students with disabilities, the duty to locate, evaluate, and identify students with disabilities, and their parents, including the disciplinary protection. The response provided primarily addresses strategies used in the general education setting, and does not focus on special education rules.

In addition to professional development that will focus on the areas of universal and diagnostic assessment as outlined in the charter application, advisors at the Delaware Met will undergo trainings led by the Special Education staff at the school so all advisors are knowledgeable of the IDEA regulations as they pertain to students with special needs and the specific accommodations and modifications that are to be provided. These professional development sessions will ensure all stakeholders that the Delaware Met advisors and administrators are knowledgeable in their roles and responsibilities in providing each student with a free and appropriate public education.

Each year, prior to the opening of school, professional development time will be devoted to a special education team-led session on the roles of each person involved in the IEP process as well as in delivering high quality, scientifically and research based instructional strategies and practices to all students at the Delaware Met. Advisors will be led through the process outlining their duties to locate, evaluate and identify students with disabilities through the defined RtI process, as well as through recommendations to the IST. Advisors will also be taken through the Procedural Safeguards so that they have a firm understanding on the rights of students and parents of a student with a disability.

In addition, because the Delaware Met has the luxury of being a smaller school setting, and each student within the school will be well known, the special education team will also make time during pre-school professional development time to create each facilitator an "IEP at a Glance" sheet for each student who has an IEP. This will allow advisors to become familiar with the expectations placed upon them for delivering high quality instruction that specifically imbeds appropriate accommodations and curricular modifications for the students who require them. This smaller, focused group will then have the opportunity to ask the special education team any questions they may have regarding a particular accommodation or modification. This will negate any school year confusion and will open the door to thoughtful communication between special and regular educators.

Throughout the school year, monthly PLC time will be dedicated to special education topics such as IEP development, the role of the regular education advisor, specialists, and administration in the process, and the regulations outlining processes and timelines associated with data collection, evaluations, IEP developments and how to effectively deliver accommodations and provide modifications as deemed necessary for a student to have full access to the general education curriculum as outlined in the IEP. This will allow for the special education team to also provide "IEP at a Glance" sheets for any newly identified or newly enrolled students so all advisors have a common understanding of who the students are and what their needs are in order to successfully access the general curriculum. This will also be time for the special education team to bring back additional information from any external professional development they attended which could benefit special education services provided to identified students

The school leader will have the responsibility of monitoring advisor compliance with accurate and timely data collection as well as ensuring that the needs of all students are being met through IEP delineated accommodations and modifications. In years one and two of operations, the school leader will be supported by the CMO project manager in monitoring the special education services and regulations. In year three of operations and beyond, the Delaware Met will hire an assistant principal who will assume responsibility for the special education services and regulations.

## English Language Learners (ELLs)

**Response Required:** There are significant errors in the application related to English Language Learners (see below):

- English Language Learners do not have IEPs unless they happen to be a student with a disability (SWD) who is dually identified as an ELL. The application states that “Students who are not currently being served under an IEP but who are suspected of having language delays...” The applicant’s response does not demonstrate a clear understanding of the distinction and overlap between ELL and dually identified (SWD/ELL).
- The Home Language Survey must be given to all incoming students not just the students the school “suspects” of having a language delay. It is the same for all Delaware districts.
- The identification of ELL students is not clear. There is no mention of the initial diagnostic English language proficiency test W-APT, or enrolling the student into an ELL program with parental permission.
- The application does not indicate that services will be provided to all ELLs. It only mentions services will be provided to those ELLs who are eligible for intense supplemental English language instruction. All ELLs must be served with ELL services until they reach a Tier C Level 5.0 on the *World-Class Instructional Design and Assessment (WIDA) Assessing Comprehension and Communication in English State-to-State (ACCESS)* test and can be exited from the ELL program.

At the Delaware Met, all provisions within Title 14 Education DE Administrative Code will be followed with regard to Educational Programs for English Language Learners<sup>2</sup> (ELLs).

### Screening and Identification of Students:

All incoming students will be given the Home Language Survey. If any questions from the Home Language Survey indicate that a student’s home language is something “other than English,” the Delaware Met will give the WIDA-ACCESS Placement Test (W-APT)<sup>3</sup> to the student to identify students who may be designated as English Language Learners. This assessment assists educators with programmatic placement decisions such as the identification and placement of ELLs. If a student’s performance on the W-APT is above a 4.0, but additional information is recommended, other indicators to consider for whether or not a student requires English Language support is information from family members and school personnel, performance evaluations by advisors, results of criterion or normed-referenced tests and/or student academic history, including work samples.

Any student who achieves a score on the English language proficiency assessment that is lower than the eligibility cut off score in listening, speaking, reading and writing as established by the Department of Education shall be identified as an ELL and entitled to a program of instruction for ELL’s. After a student is identified as an ELL, the Delaware Met will send a notification home to parents, if practicable, in a language the parent or guardian can understand, stating that their student is eligible for English language development services. Parents/guardians have the right to refuse placement of their student in the bilingual or ESL programs and also has the right to withdraw their student from either program, but must do so in writing.

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<sup>2</sup> <http://regulations.delaware.gov/AdminCode/title14/900/920.shtml#TopOfPage>

<sup>3</sup> Specific information on the WIDA in Delaware can be found at <http://wida.us/membership/states/Delaware.aspx>

At the beginning of the school year, identification, screening and parental notification of eligible students will be given within 25 days of enrollment.

#### Services for English Language Learners:

All programs of instruction for ELLs will include formal instruction in English language development and instruction in academic subjects so that ELLs have access to the regular curriculum. Programs will be in consistent pursuit of the goal of prompt acquisition of full English proficiency.

Advisors will be educated in a vast range of modifications that can be made to curriculum in order to meet the needs of ELLs. These modifications will range from purposefully imbedding elements into the plan to differentiating the lesson's implementation. Advisors will be guided through the lesson planning process, where an advisor must not only prepare a lesson that is derived from content standards and Delaware World Language Grade Level Expectations, but also clearly identifies both content and language objectives that should be attained by each student during the course of instruction. Much like the preparation of a quality lesson in a "traditional" classroom, the advisors of the Delaware Met will be diligent in their strategy choices, being sure to provide content and strategy instruction at the level of a student's comprehensible input, so as to challenge, yet not frustrate language learners.

In order for the necessary modifications to be made so advisors can reach and teach the diverse learners that may exist in their classrooms at their current content and language acquisition level, advisors will have to be educated in how to deliver multiple assessments whose data will dictate necessities for intervention and strategy instruction. Based on the ACCESS for ELLs (Assessing Comprehension and Communication in English State-to-State for English Language Learners), and the American Council on the Teaching of Foreign Languages (ACTFL), the current level of language acquisition is determined, based on identified proficiency guidelines, with all students placing within one of the six levels from "entering" at level one to "bridging" at level five or Novice-Low to Advanced-High (according to the ACTFL performance and proficiency guidelines for language learners, which are imbedded into the Delaware World Language Grade Level Expectations). Once this level is determined, advisors are able to use the resources from the World-Class Instructional Design and Assessment (WIDA) and SIOP to be able to provide students with appropriate opportunities to access both the content and language objectives.

#### Exiting the ELL Program:

Each year, all students who are identified ELLs will take the WIDA ACCESS (Assessing Comprehension and Communication in English State-to-State) test to determine their level of English Language Proficiency. All ELLs will be served with ELL services until they reach a Tier C Level 5.0 on the WIDA ACCESS test and can be exited from the ELL program.

#### Overlap between Students with Disabilities and English Language Learners:

The evaluation process to determine if an ELL student is also a Student with Disabilities will account for the student's identified disabilities as well as his/her cultural and linguistic differences. Students who have home languages other than English as determined by the Home Language Survey (HLS), will be assessed in both their native language and English, using culturally non-biased assessments that collect information--from parents, bilingual/ESL advisors, and others--which includes observational data, social emotional behavior data, sociocultural information, and academic/educational test data. Whenever possible, language assessments in both the native language and English will be used to determine the student's

development in all areas including listening, speaking, reading and writing. Special consideration will be given to the overall context of how, where and who will provide special education services to ELLs.

The Delaware Met team will engage in considerations for determining service language of special education services through:

- Student home language use, based on the HLS responses and follow-up interviews with the parents and student;
- Student levels of proficiency, both expressive and receptive, in the native language and English;
- Advisor observations of student work over an extended period of time;
- Portfolios and other samples of verbal and written student work, both native language and English;
- Informal student assessment information, including language samples and interviews in the native language and English; and
- Student school history, including such issues as whether previous schooling has been interrupted and the number of years a student has received bilingual/ESL services, as well as a review of report cards and cumulative records.

Once these assessments are conducted and data are collected and reviewed, the student will be provided with one of three options.

1. Bilingual instructional services will be provided if the student is deemed eligible and services are necessary for their success.
2. ELL instructional services which will enable him or her to continue to progress toward acquiring English language proficiency.
3. No bilingual or ELL instructional services, if data and the social history and other information reveal either that there is no other language that impacts the student's language development or the student has the language skills required to ensure academic and social success in an English language setting.

The language service option chosen will reflect the needs of the individual student. It will not be selected on the basis of availability of personnel, programs or financial resources.

### **Gifted Students**

While the applicant intends to hire dually certified educators and follow Delaware's definition of highly able learner there are concerns about student metacognition. On page 2-21 the applicant states, "Students will be able to self-select how they enhance their own learning after going through the process of identifying and vocalizing their perceived areas of strength."

#### **Response Required (see below):**

- How will this be done and what resources will assist students in identifying their own strengths and interests?
- Will this process be in place for all students?

All students at the Delaware Met will have the opportunity during their career at the school to dig deeply into who they are as learners and to discover how their interests and learning styles can be harnessed to maximize learning and increase motivation. With the support of their advisors

and mentors, students will become their own Directors of Learning through using the Personalized Learning Plan, which aligns their passions, interests, and talents with academic standards and credit requirements.

As all students and advisors go through the process of developing their Personalized Learning Plans and meeting regularly with their advisors to reflect on their learning, they will be challenged to look for indicators of giftedness such as

- High academic achievement as indicated by standardized and interim assessments
- Above average creative output in artistic, literary, scientific, or mathematics projects
- Rapid learning rates and/or unusually insightful conclusions
- Reports from advisors, staff, and parents of unique talents
- Outstanding creative or leadership abilities
- Records of experiences in gifted programs in prior schools.

If a student demonstrates indicators of giftedness, he/she will engage in additional, advisor-led activities in increasing their own academic and social metacognition such as engaging in conversations about a student's thinking. Using a think aloud strategy, advisors can model for students what thinking about their thinking looks like. Advisors can then pair students in paired-problem solving activities where one student talks through a problem, describing her thinking processes while the other partner listens and asks clarifying questions. Reciprocal teaching is another strategy that can be used for students to effectively engage with their own thinking. Gifted students will also be encouraged to keep a thinking journal, or learning log. The enhanced purpose behind this thinking journal, above and beyond learning logs that are used during classroom instruction, is that they will be ongoing accounts that reflect a student's reflection upon their own thinking. This diary of process will allow students to make note of their own awareness's of ambiguities and inconsistencies in their thinking and comment on how effectively they feel they dealt with difficulties. In a voluntary sharing of this thinking journal, students and advisors will be able to dive deeply into conversations about how students think. Advisors can then encourage students to identify trends in their own thinking and learning processes and develop plans to account for any thinking inconsistencies<sup>4</sup>. This will also allow for gifted learners to add a layer of complexity to the experiences they gain during their LTIs. However, because all students at the Delaware Met will engage in Learning Through Interest (LTI) Internships that are geared toward their interests and abilities, students will be encouraged to reflect not only on academics but also on how they are impacting their chosen field through insightful and creative contributions. In addition, as a "gifted" learner, students will be challenged to layer onto project work elements that they feel challenge their areas of strength and bolster relative areas of weaknesses. Through the Personalized Learning Plan (PLP) and differentiated learning experiences at the Delaware Met, all students will be challenged to discover who they are and what they can contribute to their communities, whether or not they are classified as "gifted."

### *Student Recruitment and Enrollment*

- The applicant team will target the City of Wilmington and New Castle County school districts. The applicant's response includes Census data and a market segment analysis and research regarding how adolescents prefer to communicate. This information will be used in the messaging and recruitment plan. Marketing will also include parents.

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<sup>4</sup> <http://www.nagc.org/index.aspx?id=205>

- The team will develop numerous marketing materials and will also identify businesses to serve as internship sites for students. The application contains detailed market strategies/tools and costs; information targeted toward parents; and information about the Big Picture Learning model. The response also includes enrollment data and an enrollment policy.
- The preferences listed in attachment 8 do not mirror those permitted by statute; specifically,
  - It is not clear that the 5-mile radius is from the school; as required by statute
  - The allowable preference is for children of persons employed on a permanent basis for at least 30.0 hours per week

Please see revised Attachment 8-A Student Enrollment Policies/Procedures

### *Student Discipline*

#### **Response Required (see below):**

- Please include a statement that ensures compliance with 14 DE Admin Code 601 and 14 Del Code §4112 that school administrators will attend required Department of Education trainings about the mandatory school crime reporting law as required by 14 DE Admin Code 601 and staff will receive training on their duty to report certain incidents of misconduct to school administration under this regulation and statute. In addition, administrators will utilize the DOE School Climate and Discipline program manager and Department of Justice (DOJ) Ombudsperson for technical assistance in regard to the Mandatory School Crime Reporting Law.

*At the Delaware Met, steps will be taken to ensure that all administrators, advisors and staff will be trained in and practice Restorative Justice. This approach to discipline allows advisors and staff to teach students conflict resolution skills and build stronger relationships by providing alternatives to traditional methods of discipline. The Delaware Met will ensure compliance with 14 DE Admin Code 601 and 14 Del Code §4112 that school administrators will attend required Department of Education trainings about the mandatory school crime reporting law and annually, staff will receive training on their duty to report certain incidents of misconduct to school administration under this regulation and statute. In addition, administrators will utilize the DOE School Climate and Discipline program manager and Department of Justice (DOJ) Ombudsperson for technical assistance in regard to the Mandatory School Crime Reporting Law.*

- Add procedures for student expulsion. The grievance process is different from the due process procedures for suspension and expulsion. Please contact John Sadowski at [jsadowski@doe.k12.de.us](mailto:jsadowski@doe.k12.de.us) for examples and/or assistance.

*Procedures for the expulsion of student are attached as Attachment 9-E.*

**The Accountability Committee concluded that the “Education Plan” section did not meet the standard.**

## Performance Management

### *Mission-Specific Educational Goals*

Mission-specific educational goals and targets are included along with measurable or demonstrable measures or assessments that are externally credible. Some assessments that are noted are qualitative and questionably credible, but are coupled with credible quantifiable measures.

### *DCAS Expectations for At-Risk Students (If proposing to serve students at risk of academic failure)*

This section is not applicable.

### *Mission-Specific Organizational Goals*

The application includes two mission-specific organizational goals:

1. School Culture - In a previous section of the application ("Education Plan: School Culture") the applicant describes the culture or ethos of the proposed school and how this culture will reinforce student intellectual and social development. Average Daily Attendance and low suspensions and reportable offenses are listed as measures for this goal.
2. Market Accountability - includes parents, staff, community and businesses. Parent attendance at student project exhibitions, annual survey results, teacher retention, instructional culture survey results and LTI project site growth are listed as measures for this goal.

### *Student Performance Levels and Academic Needs*

The applicant demonstrates an understanding of the target population with regard to student performance levels and academic needs. The Delaware Comprehensive Assessment System (DCAS) will be used as a diagnostic measure of proficiency in reading and math upon enrollment.

### *Interim Assessments*

**Response Required:** The only interim assessments listed in this section are for mathematics and ELA. There are no assessments listed for science, social studies, or any other academic or related arts programs including physical or health education. Students attending the Delaware MET should expect to receive a well-rounded education providing responsible instruction and monitoring in ALL subjects.

The Delaware Met will be a member of the Social Studies Coalition and will use the formative and summative assessments, transfer tasks, and rubrics developed by the Coalition. For the units in the curriculum map that are not developed by the Social Studies

Coalition, the teachers at the Delaware Met will use *History Alive!* instructional materials and interim assessments to teach the Delaware Prioritized Social Studies Standards as outlined in the approved Delaware Met social studies curriculum maps. *History Alive!* is a hands-on social studies program that emphasizes immersing students in the content with role plays, debate, station rotations, audio/visual aids, projects, and the multiple intelligences. Interim assessment will reflect this variety and will include both formative and summative measures. For science, the Delaware Met will be a member of the Science Coalition and will use the formative and summative assessments, and rubrics defined in the curriculum materials developed and/or adopted by the Coalition. For the science courses that have not been fully developed by the Science Coalition, teachers will use the instructional materials and interim assessments from the following materials:

- Grade 10: *Science and Global Issues – Biology* from Science Education for Public Understanding
- Grade 11: *The Natural Approach to Chemistry* from Lab-Aids

Both of these courses are aligned to Delaware Prioritized Standards for Science and are used across Delaware. As the *Next Generation Science Standards* are adopted by Delaware, the science teachers from the Delaware Met will work with the Science Coalition, as opportunities are available, to re-align instruction and assessment to these standards. In Spanish, teachers will use teacher created interim assessments that are aligned to the Delaware Prioritized World Language Standards and the enduring understandings, essential questions, and learning targets reflected in the curriculum maps. Both formative and summative assessments will reflect the various modes of communication, including interpersonal, presentational, and interpretive tasks. The Spanish teacher will use rubrics to articulate expectations for the assessment, to guide the development of the students' products, and as the final assessment tool.

The physical education program is designed as instructional modules with real world experiences in those physical activities. The physical education teacher will use rubrics and performance assessments, along with written responses, to determine the student's level of competence and mastery of the sports skills. As the student moves from the instructional module into real world applications, frequency of participation will also be added to competency assessments to ensure that students are engaging in the application phase of the module. Students will also participate in the Fitness Gram assessment at the beginning and end of the physical education course.

In health, teachers will use the assessments defined by the model health units available on the DDOE website. Additional materials and assessments outside the DDOE model health units will come from Healthteacher.com or will be teacher created. In all cases, the interim assessments will be aligned to Delaware's health standards and the enduring understandings, essential questions, and learning targets reflected in the curriculum maps.

In the visual and performing arts, students will engage in a studio and/or performance-based experience that will use both formative and summative assessments based on a rubric that articulates the characteristics found in exemplary artworks or musical pieces within a given style. For example, as students are learning about each style of art or genre of music, they will be asked to articulate their understanding of the characters of artistic style, how the elements of art manifest themselves in that style, compare it to other styles, and describe how and why they have applied their understanding of that art style to the piece they are currently developing. Similar rubrics are developed related to the production of the arts –

practicing, care of materials and instruments, etc. All assessment measures will be in alignment with the approved curriculum maps developed for the visual and performing arts courses which are in alignment with the Delaware Prioritized Standards for Visual and Performing Arts.

### *Measuring and Evaluating Academic Progress*

**Response Required:** The applicant illustrates how the school will review and monitor individual student progress through an academic year. This is the focus of the school, to create one-on-one relationships with students and monitor them through their time at the school. However, this section also asks the school to monitor cohorts of students as well as the progress of the school as a whole. These aspects are not addressed by the applicant in the application. The reason for monitoring cohorts of students as well as the school as a whole is to recognize trends and patterns in data and behavior that may inform your school's personnel, intern placement, and/or curricular choices, etc.

The narrative of the application describes the Plan, Do, Study, Act protocol for data monitoring and analysis that can be used for the whole school, individual students, and cohorts of students. At the Delaware Met, data will be reviewed not only at the individual level, but also as a whole school and in student cohorts to monitor specific groups of students and the effectiveness of various programs and interventions.

Monthly, the school leader will collaborate with the CMO to review whole school data and identify strengths, weaknesses, trends and patterns in the data. Data will additionally be disaggregated by demographics and analyzed for possible areas of concern. The review of school wide data will include data sets that are in alignment with the Charter School Performance Framework and will include academic and college and career readiness data such as DCAS, SAT, PSAT, EOC (if used), and graduation rates, including the numbers of students on target to graduate on time. Additional academic data could include the number of students in various levels of RTI interventions. The academic data review would also include school wide data that is mission/model specific, such as the number of students who have secured internships, the number of successful student exhibitions, the number of businesses and community partners in the internship database, and the number of students who are currently enrolled in college coursework. In alignment with the Charter School Performance Framework, the school leader and the CMO project manager will also review organizational data, such as such as special populations compliance data, daily attendance, discipline data, and teacher certifications data. Financial data will comprise the last category of review, such as enrollment, income, debt, and cash flow.

During the planning year, the school leader, board chairperson, and the CMO project manager will collaborate to develop a schedule of data review for the monthly board meetings, outlining month by month the data that needs to be monitored. For example, some academic data is only reported periodically after the assessment is administered. Other data, such as finance data will be reviewed monthly. Other data, such as student recruitment data, are important on a seasonal basis. Based on this schedule, the school leader and CMO project manager will prepare a monthly data dashboard to present to the board at their monthly meetings. This will allow the board to track data overtime and monitor the progress of the school in as it pertains to the Charter School Performance Frameworks and the Delaware Met's Performance Agreement. School wide data can also be reported to the faculty, media, and can be used in promotional materials for the school.

While school wide data are useful to see broad trends and patterns across the school, using data to inform the school's personnel, intern placement, and/or curricular choices requires that the school leader and CMO project manager drill down into the data to get an accurate picture of how cohorts of students are performing. Data points similar to those listed above for school wide collection will be disaggregated by team, grade level, and classroom/teacher to examine trends and patterns and to look for areas to celebrate and/or root causes when students are not exhibiting achievement. These data can be shared with teachers and teams of teachers who are responsible for those students to ensure appropriate planning and to safeguard that the needs of students are being met.

Another way to examine the data by student cohort is to examine the data from cohorts of students who fall into low achieving AYP cells. When a cohort of students from a low achieving AYP cell are not performing, it will be critical for leaders and teacher to know who those students are within the cell, determine who their teachers are, examine assessment data to identify their needs, and ensure that their gaps in knowledge of content or processes are filled. As there may be students who fall into multiple cells, drilling down to the names and instructional needs of students who fall into each of the low achieving cells and cross walking them across cells will allow leaders and teachers to create a list of high priority students who need close monitoring to ensure their success.

Because RTI is a relative newcomer to the high school space the school leader and CMO project manager will drill down into the data of special needs children, tracking the number of students in each RTI tier and the movement of students between tiers. As the school begins operations, the school leader and CMO project manager will track IEP meetings to ensure that the paperwork for special education students is in compliance.

### *Information System to Manage Student Performance*

**Response Required:** The Accountability Committee requests that the applicant identify a specific person at the school as the point person responsible for communication with Big Picture Learning and Innovative Schools regarding student performance data. There should be a specific data manager at the charter school who is capable of working as a liaison between Big Picture Learning, Innovative Schools, Delaware Met and the Department.

When the Delaware Met opens, the school leader will be the point person responsible for communication with Big Picture Learning and Innovative Schools regarding student performance data. The school leader and the CMO project manager will review data on a regular basis and present data monthly at the Delaware Met board meetings and to teachers. When data reports are due to the Department or Big Picture Learning, those data will be readily available as a product of the monthly data review. As the school builds capacity and hires an assistant principal in year three of operations, the duties of a school data manager will transition to this person, especially if they take on other responsibilities of curriculum, instruction, and assessment.

### *Training and Support for Teachers in Data*

#### *Use*

The response is acceptable.

### *Corrective Actions if the School Falls Short of Student Goals*

The applicant provides a plan for monitoring and corrective action through the creation of a Delaware Met Data Dashboard. The response is acceptable.

***The Accountability Committee concluded that the “Performance Management” section did not meet the standard.***

## Staffing

### *Staff Structure*

- Educator recruitment/selection section is sufficient—it describes the relationship between quality hiring and certification, the importance of external partnerships, and a procedural outline for the hiring process.
- Educators are compensated at 90% of Christina School district’s scale—but also include an “incentive-based pay structure”. Overall, the school’s model for compensation shows some prospects for utilizing compensation in talent management, which may lead to attracting a stronger staff than nearby schools—but there is no competitive advantage clearly outlined here.
- Staffing chart outlines reasonable growth in team in relationship to growth in student population. School leader role is central to success.
- Staffing chart indicates a programmatic focus on Spanish language courses & the need for many educators to be “dually-certified” in Special Education (aligned with school programmatic model). That said, pipelines of quality/qualified SPED educators are not identified.

### *Staffing Plans, Hiring, Management, and Evaluation*

- Staff hiring is listed as top-line responsibility for School Leader in job description, as is the ‘recruitment, development, and evaluation’ of staff
- School leader position currently requires 5-years of instructional/classroom experience and an M.A. or Doctorate. This may unnecessarily limit the field.
- School leader position prefers experience with “BIG Picture”. Again, this tightly aligns with the school’s replication philosophy.
- The processes, with a separate job posting for a “Founding Leader”, are also included within the charter application. The process includes a timeline, key parties involve, and a sense of the recruitment outlets that the Board will be accessing to identify top candidates.
- Job descriptions represent reasonable first drafts of the positions—performance metrics not including therein but including throughout the application. Organizational chart for Year 1 of operations demonstrates an adequate sense of staffing capacity needed to execute on the proposed model. The org. chart is then taken to a Year 5 state—based upon the big-picture model.
- External partnerships/capacity will be utilized by the charter, which demonstrates an understanding of the capacity needs that the charter will have. (example: Delaware Talent Management for mid-year hires—part of the IS suite of services)
- The selection/staffing criteria listed on pg. 20 of the staffing chart appear out-of-context.

Are they the criteria for that final position only or are those staffing criteria across the board? A staff selection rubric would solidify a deeper understanding on how the school will be staffed over the first year of operations and beyond.

- Personnel policy handbook is a SAMPLE version—outlines key areas of personnel policy (compensation, etc.) Appendix D-1 outlines Professional Develop “Assessment Alignment” which indicates some sense of how the charter would tailor/customize professional development efforts.
- Procedures for staff dismissal are outlined in Section 4—item 7.
- Basic DPAS-II requirements are acknowledged and prioritized. For example, the charter explains how the school leader will complete the “online modules” that are required by the DDOE to begin conducting staff evaluations.
- Additional educator evaluation tools appear to be part of the BIG Model—but these are not explicitly referenced in the staffing section.

### *Professional Development*

- A comprehensive professional development plan for the school leader as well as for staff has been provided. Half of the days are allotted for full days of professional development in the summer prior to the opening of the school as opposed to dedicated to curricular and instructional areas of focus. It is unclear why this amount of time is dedicated to the opening of the school.
- While a master calendar and sample student schedule is provided and teacher collaboration time appears inherent, an explanation of how the schedule specifically accommodates teacher collaboration and professional development time is not provided in detail.
- A well-developed professional development evaluation model has been provided.

***The Accountability Committee concluded that the “Staffing” section met the standard.***

### **Governance and Management**

- The organizational chart delineates board and management roles and lines of authority;
- Sound, clear plan for managing the relationship between the governing board and school administration.
- **Response Required:** How will the grievance process be communicated to parents? How will the Board track the timely resolution of grievances?

The grievance process will be communicated to parents through the Citizen’s Budget Oversight Committee, Advisory Board, Family Engagement Committee, the Parent/Student Handbook and the school’s website. The Board Chair will ensure outstanding grievances are tracked for progress by adding this item to either executive or regular sessions at monthly board meetings, depending upon the nature of the grievance.

- **Response Required:** The by-laws need to conform to the requirements of 14 DE Admin Code 274.4.1.3. This includes that the applicant’s business is limited to the opening and operation of Charter Schools, before and after schools programs and

educationally related programs offered outside the traditional school year. Article II of the applicant's by-laws is not so limited. Similarly, Article III of the by-laws seems to allow for purposes other than that permitted by the law in regulation.

The By-Laws for the Delaware Met have been revised to conform to the above-referenced requirements. Please see revised Attachment 13-B for the draft By-Laws. Please note the attached revised By-Laws remain in draft form until approved by the Board of the Delaware Met at their next board meeting, which is scheduled for the evening of April 10, 2013.

- **Response Required:** The Delaware Public Integrity Commission issued an opinion (07 63) concluding that charter schools are "state agencies" under the State Code of Conduct (29 Del. C., Chapter 58), and that the Code of Conduct applies to charter schools, their board members, and their employees. Any code of conduct, conflict provisions or by-law provision regarding contracts with regarding contracts with Board members (e.g., Article VII, Section 7.2 of the applicant's by-laws) should conform to the State Code of Conduct.

The By-Laws for the Delaware Met have been revised to conform to the above-referenced requirements. Please see revised Attachment 13-B for the draft By-Laws. Please note the attached revised By-Laws remain in draft form until approved by the Board of the Delaware Met at their next board meeting, which is scheduled for the evening of April 10, 2013.

***The Accountability Committee concluded that the "Governance and Management" section did not meet the standard.***

### Parent and Community Involvement

- Commitment from parents and community is evident in the application.
- The Board hosted a number of information sessions over the past two years designed to inform and involve stakeholders in planning for the proposed high school
- The applicant conducted feasibility study through a survey to get feedback from prospective parents and cadets
- The applicant intends to recruit parents for the Board, Advisory Board and Citizen Budget Oversight Committee

***The Accountability Committee concluded that the "Parent and Community Involvement" section met the standard.***

### Start-Up Operations

#### *Start-up Plan*

#### **Response Required (see below):**

- The start-up plan is a chart outlining the tasks that need to be completed. There is no narrative provided to show that the applicants truly understand the tasks required and have concrete steps to be taken to ensure completion and compliance.

The following narrative is intended to provide supplemental information to Attachment 19 which was included in the original charter application. Attachment 19 outlined the specific tasks, timelines, and individuals responsible in accordance with the application question. Specific execution plans for each task will be fleshed out by the leadership team immediately following the approval of the school's charter.

The organizational structure of the leadership team that will execute start-up plans for the school will initially involve a collaborative effort involving Innovative Schools, operating as CMO, and the school's Board of Directors. Once the school leader is hired – as soon as possible following the school's charter approval – he or she will complete the primary leadership team during the Planning Year and through the school's start-up.

To ensure that Innovative Schools' CMO work is adequately staffed, during the Planning Year the Delaware Met will be assigned a team of four individuals. This team will work directly with the school's board of Directors and school leader to build their capacity to operate their school independently by the school's first charter renewal. Responsibilities, time commitment, and key tasks for each of the team members during the planning year are outlined below:

- **CMO Coordinator (Time allotment)**
  - Responsible for coordinating Innovative Schools' CMO strategy and ensuring quality and timely delivery of all services from Innovative Schools and any subcontractors to all four CMO clients. The CMO Coordinator will manage contract negotiations with CMO clients and any CMO subcontractors; develop and monitor the yearly work plans to ensure all CMO deliverables and critical start-up activities are met; and, evaluate CMO services and staff performing CMO work.
- **CMO Project Manager (Time allotment: approximately ½ of a full-time position per school)**
  - This position will be an Innovative Schools staff member with academic expertise and will report to the CMO Coordinator. This person will be responsible for client management and serving as direct liaison with the school's Board of Directors and school leader. Examples of CMO Project Manager responsibilities will be tracking and executing planning year deliverables and conditions of approval, helping to build board capacity through attendance at monthly board meetings and coordinating board trainings, coordinating school leader recruitment (already in progress), overseeing the development of student recruitment materials, working with the school coach to ensure all training related to the school's academic program is taking place, and more.
- **Back Office Support Specialist (Time commitment: approximately ¼ of a full-time position per two schools)**
  - This position will be filled by an Innovative Schools staff member with expertise in charter school finance. This person will support the development and tracking of the charter school's budget and the implementation of financial and operational protocols to ensure compliance with laws and regulations for a public charter school.
- **School Coach (Time commitment: based on contract with national school design partner)**

- This position will be subcontracted from Innovative Schools to the national school design partner, Big Picture Learning. This position will work closely with the CMO Project manager, and will provide intensive professional development to the school leader and teaching staff to ensure a thorough replication of the academic program the school has chosen. Professional development from the school coach will be delivered through a combination of off-site, on site, and virtual training.

Innovative Schools' four-member CMO team, the school leader, and the school's board of directors will provide a variety of expertise to ensure a successful Planning Year and a strong school start-up that is more robust than most typical charter school start-up staffing structures. This multi-layered approach ensures balanced and broader decision making about critical start-up activities from specially trained paid staff (CMO and School Leader) and volunteer staff (the Board of Directors).

Following charter approval, as CMO, Innovative Schools will assign a CMO Project Manager to the Delaware Met. During the first two years, this Project Manager along with the School Coach and Back Office Support Specialist will work directly with the school leader to make sure that the school's academic program, school culture, and operations are firmly established and adequately serving students and staff. This leadership team will report directly to the Board of Directors.

In relation to the academic program, both the school principal and the CMO Project Manager will attend all professional development sessions related to the launch of the academic program so that, if in the unfortunate event there would be a transition in school leadership at any time, the CMO Project Manager will be able to maintain a consistent, local presence and ensure that a high quality academic program is maintained until a new leader is hired. Over time, as teachers are hired and as funding makes it possible for the school to hire teachers and a curriculum specialist, ongoing professional development will help spread capacity to implement the academic program across the school and ensure ongoing sustainability. As capacity is built, Innovative Schools' staffing commitment will scale back, serving more as a consultant while helping to maintain the high quality of the academic program through regular monitoring and evaluation until the school's first charter renewal.

This same type of arrangement is true for non-academic related areas of the school as well. The CMO Project Manager and Back Office Support Specialist will work with the school leader closely during the first two operating years to ensure all financial and operating protocols are in place. In Year 3, when the school should have enough funding to hire an Operations Manager, Innovative Schools will train this person to take over and CMO supports will scale back dramatically to provide more of a consultation and evaluation role.

This structure has proven effective for Innovative Schools' current CMO Clients, Academia Antonia Alonso and Early College High School at DSU. The organization has been planning for the addition of two CMO clients and is adequately staffed to absorb the additional work.

- The applicant must show a plan for how each task will be accomplished, not just a basic timeline.

Specific execution plans for each task will be developed by the leadership team immediately following the approval of the school's charter using the leadership structure described above.

*Transportation***Response Required (see below):**

- The application states, “*The Delaware MET will make every effort to accommodate transportation to/from the school beyond any single school district by establishing central hub points inside of the district for student pick-up and drop-off.*” Schools are to provide transportation for those students meeting the eligibility criteria in DOE Regulation 1104 and that those who reside in the same district as the school will receive the same level of transportation service that would be provided by that school district. Hub points may be established for those outside of the district where the school is located.

Per DOE Regulation 1104, the Delaware MET will provide transportation for all students who reside within the district of residence for the school. For those who reside outside of the school district, the Delaware MET will make every effort to accommodate transportation to/from the school by establishing central hub points inside of the district for student pick-up and drop-off.

- The application states the school leader will maintain responsibility for oversight of transportation operations. Page 10-8 of the Staffing Chart indicates that the Operations Manager will be the manager of transportation. It appears that the Administrative Assistant depicted on the organizational chart will be the initial Operations Manager who will oversee daily transportation requirements.

While ultimately the School Leader is responsible for the safety of all students, the actual day to day supervision of the transportation will fall to the Operations Manager. The Administrative Assistant would be the first contact when transportation issues are brought to light. Situations that require higher-level attention will immediately be handed over to the Operations Manager.

- The Start-up Plan on pages 19:2-4 include actions by the Charter Management Company. CMO staff performing these actions should have school transportation experience, that their role will be advisory and that they will have no continuing operational, day-to-day role for transportation.

The CMO will be the acting Operations Manager during the start up. In this role, they will be providing support in the day to day operations that include transportation. CMO staff members include prior school leaders who have transportation experience in Delaware public schools. Again, the school leader will maintain the ultimate responsibility for oversight; school leaders frequently delegate other staff front line responsibilities in many areas, including transportation oversight.

- Appendix G includes a sample transportation contract. The final contract should be signed, attested to and dated to ensure that it will be effective before students are provided transportation.

All final contracts will be signed, attested and dated to ensure effective operations prior to contract implementation.

### *Safety and Security*

- **Response Required:** For this subsection the applicant should provide a statement that the Delaware Met will comply with the safety requirements of The Omnibus School Safety Act of the 146<sup>th</sup> Delaware General Assembly and 14 DE Admin Code 621.

The Delaware Met will comply with the safety requirements of The Omnibus School Safety Act of the 146<sup>th</sup> General Assembly and 14 DE Admn Code 621.

### *Lunch/Breakfast*

- Delaware Met plans to participate in the National School Lunch/School Breakfast Programs (NSLP/SBP)
- NSLP/SBP participants must follow the NSLP procurement process for obtaining a vendor for meals, which includes going to bid.
- Schools participating in the NSLP/SBP must have a current Food Establishment Permit. The charter will need to contact Public Health to ensure that the facility has one or must obtain one.

#### **Response Required (see below):**

- A plan for obtaining a Food Establishment Permit from Public Health (if there is a not a current one in place in the kitchen)

The Delaware Met will always maintain a Food Establishment Permit and will contact Public Health to ensure the proper permit is in place prior to the school opening.

- Provide a statement that Delaware Met will follow the NSLP procurement process for obtaining a vendor for meals.

The Delaware Met will follow the NSLP procurement process for obtaining a vendor for meals, which includes going to bid.

### *Insurance*

The applicant submitted a quote relative to insurance coverage.

### *Student Records*

The applicant will use the eSchoolPlus pupil accounting system. Also, the application includes a statement that the staff will be fully trained on eSchoolPlus.

***The Accountability Committee concluded that the “Start-Up Operations” section did not meet the standard.***

## Facilities

- Currently there is no site determined. However, the Board of Delaware Met is assessing appropriate sites for the location of the school;
- It is anticipated that the facility will be located in the City of Wilmington and will be acquired through lease, once the charter has been approved;
- The Board intends to aggressively implement a fundraising plan to supplement available resources for school operations;
- The following three locations are currently being evaluated to determine the accessibility for student drop-off/pick-up, ease of access, and cost to remodel:
  - 500 Justison Street, Wilmington, DE
  - 704 N King Street, Wilmington, DE
  - 201 W 14<sup>th</sup> Street, Wilmington, DE
- Information about relevant specific websites is in Appendix C.

***The Accountability Committee concluded that “Facilities” section met the standard.***

## Budget and Finance

### Response Required (see below):

- The budget pages submitted are not complete. The “Other Funds” portion of the budget does not show the entire page so it is impossible to determine if the budget presented is balanced and realistic. One of the pages states that benefits will be offered in year 1 to the Principal and LTI Coordinator as “raises”. Full-time employment cannot be offered without benefits. These costs need to be included in the budget.

The print settings were corrected and updated budget sheets were sent to DOE on February 5, 2013. The updated budget sheets may be found in Attachment 21-A and 21-B.

The school leader and LTI coordinate will receive benefits in year one. This was calculated in the attached version of the budget, as well as the budget that was originally submitted with the charter application. The school leader will be hired as an independent contract during the planning year (June 2013 – June 2014) and no benefits will be offered to the school leader during the planning year. Once the school is opened in July 2014 benefits will be offered according to the state benefits offering and budget.

- The budget in year 1 includes a \$300K operations loan – please provide any information used to estimate the terms and repayment schedule of the loan.

Loan payments are included on Line 59 of the state & local funds sheet. These were calculated using a 10 year loan at 5.5% APR. (Please see Attachment 21-J: loan amortization sheet.) Loan payments are subject to change based on actual loan terms at time of loan closing

- The 80% budget contains no narrative to explain changes. In the 80% enrollment budget, the CMO fee has been reduced but the contract submitted does not contain any clause for a lower fee with lower enrollment.

When developing our contingency plan for lower enrollment, line items listed below are reviewed and updated to try and minimize some of our expenditures without impacting the

quality of the academic program or negatively impacting the school culture. In general, line items are changed that are directly correlated to the number of students enrolled.

- Reduced the total number of teachers to account for the lower enrollment, while maintaining reasonable class sizes. This change resulted in lower salaries, benefits, and OECs.
- Reduced several direct expense line items – supplies, textbooks, assessments, etc. These specific line items should go down with a lower number of students.
- Facility and occupancy costs remain the same in both versions of the budget. We are assuming that we will have a lease that will need to be adhered to regardless of the actual enrollment.
- The Fundraising goals were increased in the early years of the school's operation. Once the school is open and the full grade configuration is achieved, we will start to generate surpluses even at 80% enrollment.

The Board is confident of the ability to meet enrollment targets. In the unlikely circumstance enrollments fall short of these targets, the Board has already begun the important task of building relationships with the local foundations to help cover any gaps in the first few years of operation.

- Provide a detailed narrative that explains all budget assumptions and supporting documents. Also, provide a narrative around your contingency plan for lower enrollment to support the proposed budget.

A detailed budget narrative is attached (Attachment 22) and was submitted with the original charter application.

***The Accountability Committee concluded that the “Budget and Finance” section did not meet the standard.***

### **Charter Management Company & Highly Successful Charter School Operator Supplement**

#### **Response Required (see below):**

- While Innovative Schools has provided back office support services to a number of charter schools it is a new charter management organization (CMO) and has contracts with two recently approved charters and is listed as the CMO for another applicant group in the current application cycle. As a CMO, Innovative Schools could potentially have responsibility for four startup charters. Provide an explanation of Innovative Schools' capacity to serve all four schools (including this First State Military Academy) with quality.

Innovative Schools is a growing non-profit organization that operates three service divisions (Models, Staffing and Solutions) through the dedicated efforts of 12 full time employees, 6 part-time employees, and over 18 consultants. Innovative Schools further extends its staff capacity to deliver unique programs to Delaware public schools through close partnerships with several nationally recognized non-profit organizations including Big Picture Learning, New Tech Network, Expeditionary Learning, EdWorks, New York City Leadership Academy and The New

Teacher Project. By June 2013, Innovative Schools intends to add two additional full-time staff members.

In Innovative Schools' role as CMO, it will not be adding additional programming, which would require a significant amount of new staff. Instead, we are coordinating existing programming that is already in place through our organization's three divisions. When coordinated, these services provide the essential resources and capacity that is necessary to successfully launch new charter schools. We are able to accomplish this coordination within our current staffing structure and through partnerships with national school design organizations, as explained below.

In its CMO framework, Innovative Schools will serve as the CMO lead, maintaining a local presence in the school over the course of the CMO agreement and coordinating appropriate local and national resources available through our three service divisions. Because each school's academic program will be unique and based on an existing, nationally recognized model (Expeditionary Learning for Academia Antonia Alonso, EdWorks Early College for ECHS at DSU, Big Picture for The Delaware Met, and New Tech for FSMA), as CMO Innovative Schools will subcontract replication of the academic program to the national models that the school has chosen. This proposed arrangement creates a balanced workload for new school start-ups by leveraging Innovative Schools' local expertise and understanding of the needs of Delaware's public schools while allowing our national partners to execute the work that they do best – school design.

To ensure that Innovative Schools' CMO work is adequately staffed, during the Planning Year each CMO school will be assigned a team of four individuals. This team will work directly with each school's board of Directors and school leader to build their capacity to operate their school independently by the school's first charter renewal. Responsibilities, time commitment, and key tasks for each of the team members during the planning year are outlined below:

- **CMO Coordinator**
  - Responsible for coordinating Innovative Schools CMO strategy and ensuring quality and timely delivery of all services from Innovative Schools and any subcontractors to all four CMO clients. The CMO Coordinator will manage contract negotiations with CMO clients and any CMO subcontractors, develop and monitor the yearly work plans to ensure all CMO deliverables and critical start-up activities are met, and evaluate CMO services and staff performing CMO work.
  
- **CMO Project Manager (*Time allotment: approximately 1/2 of a full-time position per school*)**
  - This position will be an Innovative Schools staff member with academic expertise and will report to the CMO Coordinator. This person will be responsible for client management and serving as direct liaison with the school's board of directors and school leader. Examples of CMO Project Manager responsibilities will be tracking planning year deliverables and conditions of approval, helping to build board capacity through attendance at monthly board meetings and coordinating board trainings, coordinating school leader recruitment (already in progress), overseeing the development of student recruitment materials, working with the school coach to ensure all training related to the school's academic program is taking place, and more.

- **Back Office Support Specialist (*Time commitment: approximately ¼ of a full-time position per two schools*)**
  - This position will be filled by an Innovative Schools staff member with expertise in charter school finance. This person will support the development and tracking of the charter school's budget and the implementation of financial and operational protocols to ensure compliance with laws and regulations for a public charter school.
  
- **School Coach (*Time commitment: based on contract with national school design partner*)**
  - This position will be subcontracted from Innovative Schools to the national school design partner (Big Picture Learning, New Tech Network, Expeditionary Learning, or EdWorks Early College) that the client has selected. This position will work closely with the CMO Project manager, and will provide intensive professional development to the school leader and teaching staff to ensure a thorough replication of the academic program the school has chosen. Professional development from the school coach will be delivered through a combination of off-site, on site, and virtual training.

Together, Innovative Schools' four-member CMO team, the school leader, and the school's board of directors will provide a variety of expertise to ensure a successful Planning Year and a strong school start-up that is more robust than most typical charter school start-up staffing structures. This multi-layered approach ensures balanced and broader decision making about critical start-up activities from specially trained paid staff (CMO and School Leader) and volunteer staff (the Board of Directors).

Following charter approval, as CMO, Innovative Schools will place a CMO Project Manager at the school site. During the first two years, this Project Manager along with the School Coach and Back Office Support Specialist will work directly with the school leader to make sure that the school's academic program, school culture, and operations are firmly established and adequately serving students and staff. This leadership team will report directly to the Board of Directors.

In relation to the academic program, both the school principal and the CMO Project Manager will attend all professional development sessions related to the launch of the academic program so that, if in the unfortunate event there would be a transition in school leadership at any time, the CMO project Manager will be able to maintain a consistent, local presence and ensure the academic program maintains high quality until a new leader is hired. Over time, as teachers are hired and as funding makes it possible for the school to hire teachers and a curriculum specialist, ongoing professional development will help spread capacity to implement the academic program across the school and ensure ongoing sustainability. As capacity is built, Innovative Schools' staffing commitment will scale back, serving more as a consultant while helping to maintain the high quality of the academic program through regular monitoring and evaluation until the school's first charter renewal.

This same type of arrangement is true for non-academic related areas of the school as well. The CMO Project Manager and Back Office Support Specialist will work with the school leader closely during the first two operating years to ensure all financial and operating protocols are in place. In Year 3, when the school should have enough funding to hire an Operations Manager is hired, we will train this person to take over and our supports will scale back dramatically to provide more of a consultation and evaluation role.

This structure has proven effective for Innovative Schools' current CMO Clients, Academia Antonia Alonso and Early College High School at DSU. The organization has been planning for the additional of two additional CMO clients and is adequately staffed to absorb the additional work.

**Innovative Schools is different from other Charter Management Organizations in the following ways:**

- Innovative Schools is a non-profit organization while other CMOs that have operated in Delaware have been for-profit
  - Innovative Schools' CMO model is a scale down model. The most intensive support occurs when the school is first launched and is scaled down as the school matures and builds capacity in staff and experience. Following the CMO contract, the school has the option to maintain services as needed based on their needs (similar to the way we support charter and districts schools already). For-profit CMOs typically have a longer term or permanent contract with the school.
  - Innovative Schools is locally based and staffed and has been supporting back office support services for several years with great success. For the academic program, Innovative Schools' is partnering with national school design organizations that have launched networks of schools across the country with great success. This local and national perspective will offer the school multi-layered support and perspectives.
  - Innovative Schools supports both district and charter schools with Human Capital initiatives. These resources are already well established and will be useful in helping to launch new schools.
- 
- What schools in the Big Picture Learning network have not succeeded and what lessons learned are being applied to this effort?

There are currently 56 schools in the United States and 64 schools around the world which are replicating the Big Picture Learning (BPL) school design. Since the launch of the first BPL school in 1995 in Providence RI, only two BPL schools have closed or transitioned out of the BPL network. The BPL school in Chicago was closed to district budget cuts and the BPL leadership decided to withdraw from supporting Trumann High School because of the school's lack of fidelity to the BPL model.

**Chicago Big Picture Learning**

The closing of this Chicago BPL school is an example a district not completely understanding the BPL model and the limitations that traditional conceptions of school would place on the school leaders, advisors, and students at the school. The closing of the Chicago school was 10 years ago and very early in the expansion of the BPL network. At that time, BPL was only starting "pure" BPL schools who agreed to replicate with a high degree of fidelity to the model. On a school visit, when the regional supervisor for BPL saw the school's advisories, LTI's, exhibitions, and project-based work, she was shocked. BPL leaders and coaches attempted to engage with the district and school leader to clarify the school design and chart out a path forward to replicate the model with greater fidelity, but found that the process to engage in this work was a constant battle with the district; the district was insisting on seat time, traditional classes, tests, etc. The district supervisors were not open to value of advisories and internships and did not have a vision for how real world experiences could drive the academic program for students. The conflict was exacerbated by the fact that the people in the district who promoted

the BPL school design, were no longer there. After attempting to work with the district to remedy the misunderstanding and renew the commitment of the district to BPL, the district decided to close the school due to budget cuts.

**Lessons Learned:**

1. When a school decides to replicate the BPL school design, it is crucial that the founding board of the school, in the case of a new charter school start-up, or the district administration, in the case of a district school replication, develop a deep understanding of the BPL model so that they can support and advocate for the school and the unique educational experience it brings to students. Transparency of the model and the process of replication are paramount for those replicating the model, and transparency about the context of replication is critical for BPL.
2. The degree of fidelity to the BPL model may be different from school to school based on the context of the school and local education landscape. Just as the school design approaches learning “one student at a time,” the national organization of BPL approaches replication of the model “one school at a time.” The goal of coaching a BPL replication is to continually move the school toward a greater fidelity to the Ten Distinguishers of BPL schools. Each school approaches replication differently, and BPL must remain flexible and open to working within the context of the school to challenge traditional notions of learning.

**Truman High School, Seattle, WA**

Truman High School was a school transformation from a traditional school into a BPL school. As the school transformed into a BPL school, two challenges became apparent. Individual grade levels of teachers implemented the model with varying degrees of fidelity. Additionally, some of the teachers - even if they were excellent content- area teachers – did not transition into excellent advisors. Therefore, not all of the teachers were able to develop relationships with the students in their advisory and guide them in developing the Personalized Learning Plan. While these are certainly challenges to the replication of BPL, the leadership of BPL believes that these issues could have been resolved, and the school would have been successful at replicating the school design.

The reason that BPL withdrew from Truman High School was due to the school leadership. The original principal at the school was trained in the BPL model and totally committed to it. When she announced that she was retiring, the dean of studies (Jeff Petty - who ended up starting his own BPL school in Highline, WA), was prepared to step into the principal position and create a smooth transition. The district decided to bring in someone from the outside that was unfamiliar with BPL and not committed to continuing the transition from a traditional school to a BPL school. BPL decided to pull out of supporting Truman because the BPL leadership felt that having a school attached to the BPL name and not really implementing the design would set a bad precedent, as well as ruin the BPL reputation.

**Lessons Learned:**

1. It is much easier to start a school from scratch than to convert an existing school. In a transformation, the leadership “inherits” teachers and students who did not choose to be in a BPL school and the higher the grade level, the harder it is to institute a new model of learning.
2. Subject area teachers are not necessarily great advisors, so the hiring process becomes critical. BPL likes to be a part of each hiring decision to ensure that teachers can become advisors.

3. Each advisor in a BPL school needs to have his/her own Professional Development Plan and personalized coaching to ensure that his/her needs around fidelity to replication are being met.
4. Selecting the right leader for a BPL school is paramount. The leadership carries the vision of the school and must be committed to driving forward the Ten Distinguishers of BPL.

The district leadership of board leadership must understand BPL and be committed to replication of the model. If there is transition at the district or board level, the new leaders need to engage in learning about BPL.

- Budget Narrative (Lines 55-58) CMO fees – Does \$245,626 CMO fee include Big Picture Learning fees? Need to review breakout.

CMO Fees included in the Delaware Met budget do include fees to replicate the Big Picture Learning model. As CMO, Innovative Schools will subcontract the establishment of The Delaware Met's academic program to Big Picture Learning. The structure below provides an estimate of the fees that have been budgeted. A final contract and fee structure between Innovative Schools and Big Picture Learning would be finalized following The Delaware Met's approval and if Innovative Schools is selected as the school's CMO provider through an RFP process.

- Planning Year: \$25,000
- Operating Year : \$110,000
- Operating Year 2:\$110,000
- Operating Year 3:\$110,000
- Operating Year 4: \$100,000

***The Accountability Committee concluded that the “Charter Management Company...” section did not meet the standard.***

### Summary and Recommendations

Application Sections	Charter School Accountability Committee' s Recommendations
(1) Founding Group and School	Met
(2) Education Plan	Not Met
(3) Performance Management	Not Met
(4) Staffing	Met
(5) Governance and Management	Not Met
(6) Parent and Community Involvement	Met
(7) Start-up and Operations	Not Met
(8) Facilities	Met with conditions
(9) Budget and Finance	Not Met
(10)Charter Management Company & Highly Successful Charter School Operator Supplement	Not Met

The Charter School Accountability Committee recommends to the Secretary of Education that the application for the Delaware Met High School **not** be approved.

## Appendix A

### List of Attendees

#### Preliminary Meeting of the Charter School Accountability Committee

#### Delaware Met High School

7 February 2013

#### Members of the Committee

- Mary Kate McLaughlin, Committee Chair, Chief of Staff
- Karen Field Rogers, Manager, Financial Reform & Resource Management; Interim Chairperson
- Debora Hansen, Education Associate, Visual and Performing Arts; Charter School Curriculum Review
- Paul Harrell, Director of Public and Private Partnerships
- Jennifer Kline, Education Associate, Procedural Safeguards and Monitoring
- April McCrae, Education Associate, Education Associate, Science Assessment and STEM
- Kendall Massett, Executive Director, Delaware Charter Schools Network (Nonvoting)
- Donna R. Johnson, Executive Director, State Board of Education (Non-voting)

#### Staff to Committee

- Catherine T. Hickey, Deputy Attorney General, Counsel to the Committee
- John Carwell, Director, Charter School Office
- Patricia Bigelow, Education Associate, Charter School Office
- Chantel Janiszewski, Education Associate, Charter School Office

#### Representatives from Delaware Met High School

- Dawn Downes, Director of Teaching and Learning, Innovative Schools
- Natalie Sadorf, School Support Specialist, Innovative Schools
- Rhonda Hill, School Support Specialist, Innovative Schools

#### Additional Attendees

- Amber Cooper, Office of Management and Budget
- Leighann Hinkle, Office of Management and Budget

## Appendix B

### Information for the School Culture Section

#### School Culture

Due to recent legislative and model policy changes, recommend editing the following sections of the sample bullying prevention policy as follows:

- Under section VI, 4 – *“Part of the procedure of the investigation of such instances shall include a determination of whether the target of the bullying was targeted or reported being targeted wholly or in part due to the target’s race, age, marital status, creed, religion, color, sex, disability, sexual orientation, gender identity or expression, physical appearance or national origin. This subsection does not preclude the school from identifying other reasons or criteria why a person is a target of bullying.”*
- Under section VI, 9 (B) – *“All alleged and substantiated incidents of bullying must be reported to the DOE within 5 working days. The report of substantiated incidents shall include the determination of whether the target of the bullying was targeted or reported being targeted wholly or in part due to the target’s race, age, marital status, creed, religion, color, sex, disability, sexual orientation, gender identity or expression, physical appearance, national origin or other reason.”*
- Under section IX, B – *“All school employees must either attend the provided training session live or participate via the on-line training module provided by the DDOE through its Professional Development Management System (PDMS). Regardless of training content delivery used, staff with Identify Management System (IMS) accounts shall verify training by checking the assurance statement for the bullying/gang identification course in the Blackboard course delivery system. School administration will finalize verification through the PDMS.”*
- Under section XVII – Make section B its own roman numeral titled “Immunity”. Delete the words “Criteria to be included are:” prior to the immunity statement. Section XVII should then read: *“In any year when the Delaware Department of Education provides an awards system for exemplary bullying prevention programs, the school shall submit a nomination if it believes its program is exemplary and the reasons why it believes that school should receive an award for its Bully Prevention Program, with supporting documentation.”*
- See recently approved regulation which requires additional language to address cyber bullying that will need to be added to policy.  
<http://regulations.delaware.gov/register/march2013/final/16%20DE%20Reg%20955%2003-01-13.htm>
- Add new Roman numeral section titled “School Ombudsman Information.” Include following statement: *“The telephone number of the Department of Justice School Ombudsman shall be provided in writing to parents, students, faculty and staff; and shall be on the website of the school district and each school. The contact information shall also be prominently displayed in each school.”*

- It is unclear *how* a student/parent should report what they believe to be an incident of bullying to school administration.
- Anti-hazing policy is not addressed. Reference [14 Del. C. §§ 9301-9304](#)

## Appendix C

### Facilities: Additional Information

- Once the site is determined, Delaware Met will need to provide the Department with a property layout/floor plans;
- The Department may need to perform a site visit to review and assess;
- If school site will be located inside existing religious schools, all religious artifacts must be removed from the premises
- Certificate of Occupancy: Delaware law requires that new charter applicants obtain a Certificate of Occupancy by June 15<sup>th</sup> prior to the opening of the school. It is critical that the applicant allow sufficient time for the permit processing to ensure the facility is approved within a timely manner. Contact should be made early in the process with various agencies to determine when requests must be submitted for approval. Many agency approval processes require significant lead-time and multiple steps. If the Board of Directors of a charter school is unable to obtain the Certificate of Occupancy by this schedule, they should consider requesting a one-year delay for the school opening. See 14 Del. C. § 511, Approval Procedures (see link below):  
<http://delcode.delaware.gov/title14/c005/index.shtml>
- For final school site, Delaware Met needs to ensure compliance with the Americans with Disabilities Act (ADA) regulations (see link below)  
[http://www.ada.gov/2010ADASTandards\\_index.htm](http://www.ada.gov/2010ADASTandards_index.htm)
- School Safety: It is recommended to refer to the State of Delaware Homeland Security Comprehensive Emergency Management Planning for Schools (CEMPS)  
[http://dema.delaware.gov/information/school\\_safe.shtml](http://dema.delaware.gov/information/school_safe.shtml)

### RELATED PROJECT INFORMATION

Prior to the construction of a new charter school or the renovation of an existing building as a charter school, it is recommended that the charter school review the following websites for laws and regulations:

Preliminary Land Use Service (PLUS)  
<http://stateplanning.delaware.gov/plus/>

For State of Delaware laws pertaining to asbestos. 16 Del. C. Chapter 78  
<http://delcode.delaware.gov/title16/c078/index.shtml>

Federal EPA laws and additional information pertaining to asbestos can be obtained at: [www.epa.gov/schools](http://www.epa.gov/schools) or [www.epa.gov/asbestos](http://www.epa.gov/asbestos)

Further, contact the regional EPA office in Philadelphia at:  
Asbestos Program Coordinator  
USEPA Region 3  
1650 Arch Street  
Philadelphia, PA 19103-2029  
(215) 814-2103

For additional information please see the following reference documents:

14 Del. C. Chapter 5 (Charter Schools)

<http://delcode.delaware.gov/title14/c005/index.shtml>

Delaware Department of Education School Construction

Manual <http://facilitynet.doe.k12.de.us/schooldata/default.sht>