



OFFICE OF CHARTER SCHOOLS

December 1, 2021

Dr. Ida Oberman
Community School for Creative Education
2111 International Blvd
Oakland, CA 94606

ida@communityschoolforcreativeeducation.org

Re: Proposition 39 Facilities Request for 2022-23
Response to Charter School’s Enrollment Projections

Dear Dr. Ida Oberman:

The Oakland Unified School District (“OUSD” or “District”) responds to the November 1, 2021 Request for Facilities for Community School for Creative Education (“Charter School”) for the 2022-23 school year.

The regulations implementing Proposition 39¹ permit a school district to assess the projections upon which a charter school’s facilities request is based, express objections to those projections, and issue a counterprojection. In conducting its evaluation, the District assesses whether the charter school’s Request for Facilities meets the requirements contained in the regulations² governing such a request.

The District objects to Charter School’s projections as set forth below.

REVIEW OF CHARTER SCHOOL’S ENROLLMENT PROJECTIONS

Proposition 39 only obligates a school district to offer facilities commensurate with a charter school’s In-District population. Therefore, the District will only evaluate the Charter School’s In-District classroom-based Average Daily Attendance (In-District ADA) projections. The Charter School’s enrollment and enrollment projections are as follows:

Table 1: Charter School’s Enrollment and Projections

Grade	21-22 In-District Enrollment	22-23 Projected In-District Enrollment	22-23 Projected Attendance Rate	Projected 22-23 In-District ADA
TK	1	2	94.00%	9
K	15	17	94.00%	16
1	17	20	95.00%	18
2	18	25	95.00%	21
3	17	25	95.00%	21
4	26	24	95.00%	21
5	25	27	95.00%	26
6	20	23	95.00%	23
7	20	27	95.00%	25

¹ Cal. Admin. Code, title 5, §11969.9(d)

² Cal. Admin. Code, title 5, § 11969.9(c)(1)(A)



OFFICE OF CHARTER SCHOOLS

8	18	25	94.00%	21
Total	177	214	-	202

Source: Charter School's Proposition 39 Facilities Request Form, Appendix I

OUSD'S EVALUATION OF CHARTER SCHOOL'S ADA PROJECTIONS

As shown in Table 2, Charter School incorrectly lists the school's 2020-21 and 2021-22 enrollment, for both Oakland residents and total enrollment, in Appendix I. Appendix I asks specifically for enrollment as of CBEDS Census Day. The school's 2022-23 enrollment projections are based in part on these incorrect figures.

Table 2: Charter School's 2020-21 and 2021-22 In-District Enrollment – Appendix I Compared to CBEDS Census Day

Grade	2020-21 In-District Enrollment			2021-22 In-District Enrollment		
	Actual CBEDS	Per Appendix I	Difference	Actual CBEDS	Per Appendix I	Difference
TK	2	0	-2	1	1	0
K	26	6	-20	16	15	-1
1	23	23	0	21	17	-4
2	25	24	-1	18	18	0
3	26	18	-8	17	17	0
4	27	28	+1	26	26	0
5	25	24	-1	24	25	+1
6	32	24	-8	21	20	-1
7	24	30	+6	21	20	-1
8	22	19	-3	20	18	-2
Total	232	196	-36	185	177	-8

Source: Charter School's Proposition 39 Facilities Request Form, Appendix I; Annual Fall Census Day student-level enrollment reports submitted to ACOE in October 2020 and October 2021.

Furthermore, as shown in Table 3 below, Charter School is projecting a substantial increase in the retention rates for its current cohorts of 1st through 7th graders between 2021-22 and 2022-23. Charter School did not provide documentation to support the increases in enrollment and retention for these grades. As shown in Table 4, the projected retention rates are much larger than the previous year's retention rates for each grade-level cohort. The Charter School's Prop 39 Request for Facilities stated that "CSCE is planning a slow return to pre-pandemic numbers" in the section where it was asked to describe the methodology it used to create its ADA projections but there is limited evidence that this is realistic, given the ongoing pandemic and the lack of a concrete recruitment plan provided by the Charter School in the Prop 39 application. Many public schools statewide, including OUSD, are anticipating declining enrollment for the 2022-2023 school year.³

³ OUSD June 30, 2021 Board Meeting, adoption of proposed budget for 2021-2022 (<https://ousd.legistar.com/LegislationDetail.aspx?ID=4984987&GUID=20DC4088-11B6-44A9-AED0-9E752F69434B>)



OFFICE OF CHARTER SCHOOLS

Table 3: Charter School’s Projected In-District Cohort Retention Rate

Cohort Grade Level by Year		21-22 Cohort CBEDS In-District Enrollment	Projected 22-23 Cohort In-District Enrollment	Projected Attrition/Retention Rate
2021-22	2022-23			
1 st	2 nd	21	25	119%
2 nd	3 rd	18	25	139%
3 rd	4 th	17	24	141%
4 th	5 th	26	27	104%
5 th	6 th	24	23	96%
6 th	7 th	21	27	129%
7 th	8 th	21	25	119%

Source: Charter School’s Proposition 39 Facilities Request Form, Appendix I; Annual Fall Census Day student-level enrollment reports submitted to ACOE in October 2020 and October 2021.

Table 4: Charter School’s Actual In-District Cohort Retention Rate Between 2020-21 and 2021-22

Cohort Grade Level by Year		20-21 Cohort In-District Enrollment	21-22 Cohort In-District Enrollment	Attrition/Retention Rate
2020-21	2021-22			
K	1 st	26	21	81%
1 st	2 nd	23	18	78%
2 nd	3 rd	25	17	68%
3 rd	4 th	26	26	100%
4 th	5 th	27	24	89%
5 th	6 th	25	21	84%
6 th	7 th	32	21	66%

Source: Annual Fall Census Day student-level enrollment reports submitted to ACOE in October 2020 and October 2021.

OUSD COUNTERPROJECTIONS:

The District is exercising its right to provide counterprojections to the Charter School’s projections for the 2022-23 school year. Based on factors discussed above, the District counterprojects a total of **150.9** In-District ADA for the Charter School. The District’s grade-level counterprojections are shown in Table 5 below.

Table 5: 2022-23 In-District ADA – Charter School Projections and OUSD Counterprojections

Grade Level	Charter School Projections	OUSD Counterprojections
TK	1.88 ⁴	1.88
K	16	16.00
1	18	18.00
2	21	16.16

⁴ The Charter School projected 9 in-district TK ADA in Table 3 of Appendix I. However, given the projected in-district TK enrollment of 2 students listed in Table 1 and the projected attendance rate of 94% listed in Table 2, this number should have been calculated as 1.88 in Charter School’s Table 3 in Appendix I, rather than 9.



OFFICE OF CHARTER SCHOOLS

3	21	13.34
4	21	10.98
5	26	24.70
6	23	20.29
7	25	13.17
8	21	16.38
Total	193.88	150.9

Source: Charter School Projections – Charter School’s Proposition 39 Facilities Request Form, Appendix I; OUSD Counterprojections – calculated in Table 6 and as explained below

The District’s counterprojections for grades 2-8, as shown below in Table 6, were developed by considering the following factors: (1) 2021-22 CBEDS in-District enrollment, (2) each cohort’s attrition/retention rate between the prior and current school years (as calculated in Table 4), and (3) the Charter School’s projected attendance rates.

Table 6: Calculation of Grades 2-8 In-District ADA Counterprojections

Cohort Grade Level by Year		(A) CBEDS 2021-22 In-District Enrollment	(B) Cohort Attrition/Retention Rate Between 2020- 21 and 2021-22	(C) 2022-23 Projected Attendance Rate	Cohort 2022-23 In-District ADA Counterprojection (A x B x C)
2021-22	2022-23				
1	2	21	81%	95%	16.16
2	3	18	78%	95%	13.34
3	4	17	68%	95%	10.98
4	5	26	100%	95%	24.70
5	6	24	89%	95%	20.29
6	7	21	66%	95%	13.17
7	8	21	83%	94%	16.38

Source: Charter School’s Proposition 39 Facilities Request Form; Annual Fall Census Day student-level enrollment reports submitted ACOE in October 2020 and October 2021; and OUSD Counterprojections – calculated as shown in column header

CONCLUSION:

Charter School has until January 3, 2022 to deliver a response to this letter to charteroffice@ousd.org. Please do not mail or hand deliver a response to this letter.

Pursuant to Cal. Admin. Code tit. 5, § 11969.9, additional information included in the letter (beyond what is permitted under subdivision (e)) will not be considered.



**OAKLAND UNIFIED
SCHOOL DISTRICT**

Community Schools, Thriving Students

OFFICE OF CHARTER SCHOOLS

Sincerely,

Kelly Krag-Arnold
Deputy Director, Office of Charter Schools

Sonali Murarka
Director, Office of Charter Schools