OFFICE OF CHARTER SCHOOLS

OAKLAND UNIFIED SCHOOL DISTRICT
Community Schools, Thriving Students

November 25, 2019

Mariko Highsmith
Envision Academy of Arts & Technology
111 Myrtle Street, Suite 203
Oakland, CA 94607

Re: Proposition 39 Facilities Request for 2020-21
Response to Charter School's Enrollment Projections

Dear Mariko Highsmith:

The Oakland Unified School District ("OUSD" or "District") responds to the October 30, 2019 Request for Facilities for Envision Academy of Arts & Technology ("Envision" or "Charter School") for the 2020-21 school year.

The regulations implementing Proposition 39[1] 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 regulations[2] governing such a request.

The District objects to the 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 Envision's In-District classroom-based Average Daily Attendance (In-District ADA) projections. Envision's enrollment and enrollment projections are as follows:

Table 1: Envision's Enrollment and Projections

Grade	2019-20 In-District Enrollment	2019-20 Attendance Rate	19-20 In-District ADA	20-21 Projected In-District Enrollment	20-21 Projected Attendance Rate	Projected 2020-21 In-District ADA
6	36.1	95%	34.30	50.4	95%	47.88
7	-	-	-	75.6	95%	71.82

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, Envision is projecting the current 6th grade cohort to more than double with an increase of 109% as they articulate to 7th grade in the 2020-21 school year (from 34.30 to 71.82 In-District ADA). Additionally, as shown in Table 3, Envision is projecting to increase the number of 6th graders by 40% between the 2019-20 and 2020-21 school years (from 34.30 to 47.88 In-District ADA). Envision failed to provide documentation supporting the projected increases in ADA in

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

violation of the regulations implementing Prop 39[3].

As indicated in the OUSD Proposition 39 Facilities Request Form Instructions, a projected enrollment increase in TK, kindergarten, 6th grade, and/or 9th grade of more than 15% between the 2019-20 and 2020-21 school years requires the inclusion of Appendix II, Student Application Documentation, in order to provide evidence for the additional projected ADA. Envision projected an increase of 40% in their 6th grade. Envision did not include Appendix II in the facilities request, nor did Envision include any documentation to support the projected increase in enrollment in 6th grade.

Additionally, Envision did not provide documentation to support the projected 109% increase in enrollment for the current 6th grade cohort. Lastly, it should be noted that Envision's 2019-20 Prop 39 request substantially over-projected their 2019-20 enrollment. Envision projected and was provided space for 97.15 ADA, while the 2019-20 ADA is 34.30. Therefore, it is within the District's discretion to conclude that any additional projected ADA beyond what can be projected from the current 2019-20 enrollment has not been sufficiently substantiated by relevant documentation.

Table 2: Envision's 2019-20 Enrollment and 2020-21 Enrollment Projection: By Cohort

Cohort Grade Level by Year		19-20 Cohort Enrollment	Projected 20-21 Cohort Enrollment	% Increase in Cohort's ADA
6th Grade	7th Grade			
2019-20	2020-21	34.30	71.82	109%

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

Table 3: Envision's 2019-20 Enrollment and 2020-21 Enrollment Projection: 6th Grade

Grade Level	19-20 In-District ADA	Projected 20-21 In-District ADA	% Increase (In-District ADA)
6th Grade	34.30	47.88	40%

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

OUSD COUNTERPROJECTIONS:

The District is exercising its right to provide counterprojections to the Charter School's projections for the 2020-21 school year. Based on factors discussed above, the District counterprojects a total of **73.74** In-District ADA for the Charter School's middle school grade levels. The District's grade-level counterprojections are shown in Table 4 below.

Table 4: 2020-21 In-District ADA – Charter School Projections and OUSD Counterprojections

Grade Level	Charter School Projections	OUSD Counterprojections
6	47.88	39.44
7	71.82	34.30
Total	**119.70**	**73.74**

Source: Charter School Projections – Charter School's Proposition 39 Facilities Request Form, Appendix I; OUSD Counterprojections – calculated in Tables 5 and 6 below

[3] Cal. Admin. Code, title 5, § 11969.9(c)(1)(C)

The District's counterprojection for 6th grade, as shown in Table 5, was developed by considering the following factors: (1) the current 6th grade In-District enrollment, (2) the maximum rate of increase at a transitional grade (TK, K, 6th, 9th) allowed without additional documentation per the OUSD Prop 39 Application Instructions, and (3) Envision's projected 2020-21 attendance rate. The District's counterprojection assumes that next year's 6th grade cohort will be of similar size to this year's, as documentation to support an increase in meaningfully interested students was not submitted. However, the District's counterprojection did allow for a 15% increase in enrollment, since the Prop 39 Application Instructions indicated that a transitional grade could be projected to increase by up to 15% without additional student application documentation to support the increase.

Table 5: Calculation of 6th grade In-District ADA Counterprojection

Grade	(A) 19-20 In-District Enrollment	(B) Max 6th Grade Rate of Increase	(C) 19-20 Projected Attendance Rate	In-District ADA Counterprojection ((A x B) + A) x C
6th grade	36.1	15%	95%	39.44

Source: Charter School's Proposition 39 Facilities Request Form; OUSD Counterprojections – calculated as shown in column header

The District's counterprojection for 7th grade, as shown in Table 6, was developed by considering the following factors: (1) current 6th grade In-District enrollment and (2) Envision's projected 2020-21 attendance rate. Documentation to support a 109% increase in enrollment for the current 6th grade cohort as they articulate to 7th grade for the 2020-21 school year was not submitted; therefore, the District's counterprojection assumes a 0% rate of attrition for the current 6th grade class between the 2019-20 and 2020-21 school years without the addition of new students, as 7th grade is not a standard transition year.

Table 6: Calculation of 7th grade In-District ADA Counterprojection

Cohort Grade Level by Year		19-20 In-District Enrollment	Projected 20-21 Attendance Rate	Cohort In-District ADA Counterprojection (19-20 enrollment x attendance rate)
19-20	20-21			
6	7	36.1	95%	34.30

Source: Charter School's Proposition 39 Facilities Request Form; OUSD Counterprojections – calculated as shown in column header

CONCLUSION:

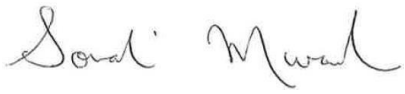
Envision has until January 2, 2020 to deliver a response to this letter to charteroffice@ousd.org. Please do not mail or hand deliver a response to this letter.

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.

OFFICE OF CHARTER SCHOOLS

Sincerely,

Kelly Krag-Arnold
Policy Specialist, Office of Charter Schools



Sonali Murarka
Director, Office of Charter Schools