

**ORANGE CENTER SCHOOL DISTRICT
STAFF REPORT AND PROPOSED FINDINGS OF FACT
CONCERNING CALIFORNIA VIRTUAL ACADEMY @ FRESNO RENEWAL PETITION**

Date Posted: June 10, 2025

The following provides a summary of the Orange Center School District's ("District") staff report and proposed findings of fact ("Staff Report") concerning the California Virtual Academy @ Fresno ("CAVA") renewal petition ("Renewal Petition").

Introduction and Procedural Background

CAVA has operated as a non-classroom-based, independent study charter school under the authorization of the District since 2012. CAVA implements a proficiency-based learning model and utilizes a variety of instructional options to provide educational services to its students. CAVA currently serves a population of approximately 1,520 students in transitional kindergarten ("TK") through twelfth grade. According to the most recent data available on the California School Dashboard ("Dashboard"), CAVA's student population consists of 77.8% socioeconomically-disadvantaged students, 11% English Learners, 0.3% foster youth, 2% homeless, and 12.3% students with disabilities. CAVA's current charter term expires on June 30, 2025, and it is seeking a two-year renewal term beginning on July 1, 2025 and ending June 30, 2027 due to its designation as a low-performing charter school by the California Department of Education ("CDE").

On February 6, 2025, the District received a renewal petition from CAVA. During an initial review of the document, the District found that it did not include a meaningful narrative or analysis of CAVA's performance schoolwide or among its student subgroup populations on the state and local indicators reported on the Dashboard. In addition, the description of the verified data that CAVA included was lacking in detail, not disaggregated by student group, and did not demonstrate how students performed on the subject matter tested year over year. Additionally, the renewal petition was structured in a manner that did not provide a sufficient description of the distinct elements required under Education Code sections 47605 and 47607 to reflect CAVA's understanding of the law and its application to the charter school's program and operations. To that end, the District notified CAVA of its concerns and provided CAVA the opportunity to submit an updated renewal petition.

On April 2, 2025, the District received a copy of CAVA's updated renewal petition ("Renewal Petition"). April Warren, Lead Petitioner and Head of School, also provided a signed certification to the District, dated April 2, 2025, deeming the Renewal Petition to be complete.

On May 2, 2025, CAVA provided the District with a written corrective action plan, at the request of the District and as required by Education Code section 47607.2(a)(4)(A), due to its designation as a low-performing charter school.

On May 14, 2025, the District's Governing Board ("Board") held a public hearing to determine the level of support for the Renewal Petition by teachers, other District employees, and parents/guardians.

On June 25, 2025, the District's Board will hold a public hearing on the Renewal Petition during which time District staff and CAVA representatives will receive equal time and procedures to address the Staff Report, proposed findings, and recommendation. After receiving public comment, the Board will deliberate and take action to either grant or deny the Renewal Petition.

As discussed in further detail below, District staff, in consultation with legal counsel, has conducted a comprehensive review of the Renewal Petition and the academic achievement and performance of CAVA students utilizing the charter renewal criteria under Assembly Bill 1505 and codified in Education Code sections 47607 et seq. Based on that review, District staff finds that CAVA is not eligible for renewal due to its designation as a low-performing charter school. In addition, District staff did not find that CAVA presented evidence reflecting sufficient student progress or achievement to justify a two-year renewal term. Therefore, the District recommends that the Board deny the Renewal Petition and direct CAVA to implement the closure procedures set out in its current charter.

Charter Renewal Criteria and Findings of Fact

The consideration of a renewal petition requires the District to: (1) determine whether the charter school meets applicable eligibility requirements using the new accountability criteria under Assembly Bill 1505 and reflected in the Dashboard, and (2) evaluate whether the renewal petition meets the standards and criteria set forth in Education Code section 47605. An analysis of these two components of the charter renewal process is addressed in detail below and includes District staff's corresponding findings of fact.

1. CAVA's Eligibility for Renewal Under New Accountability Criteria / Findings of Fact

Education Code section 47607 provides that a "chartering authority may grant one or more subsequent renewals pursuant to subdivisions (b) and (c) and Section 47607.2." These provisions detail a three-tiered system that categorizes a charter school as a high-performing, middle-performing, or low-performing charter school. The designation of a charter school in a particular tier determines the level of review that the chartering authority must conduct to evaluate whether the charter school is eligible for renewal of its charter.

The California Department of Education provides access on its website to a list of California public charter schools and the respective performance tier to which they have been assigned based on the criteria set forth in Education Code sections 47607 and 47607.2. This list is available at <https://www.cde.ca.gov/sp/ch/performcategory.asp>.

a. Eligibility for Charter Renewal as a "Low-Performing" Charter School

CAVA qualifies as a low-performing charter school. Low-performing charter schools have a **presumption of denial** under the law. Specifically, Education Code section 47607.2(a)(1) states:

The chartering authority **shall not** renew a charter if either of the following apply for two consecutive years immediately preceding the renewal decision:

(A) The charter school has received the two lowest performance levels schoolwide on all the state indicators included in the evaluation rubrics adopted pursuant to Section 52064.5 for which it receives performance levels.

(B) For all measurements of academic performance, the charter school has received performance levels schoolwide that are the same or lower than the state average and, for a majority of subgroups performing statewide below the state average in each respective year, received performance levels that are lower than the state average.

However, charter schools may receive a maximum two-year renewal based on a "second look" in which the District conducts a deeper evaluation of the charter school's academic achievement and determines whether:

- CAVA is taking meaningful steps to address the underlying cause or causes of its low performance, and those steps are or will be, reflected in a written plan adopted by CAVA's Board of Directors.
- Clear and convincing evidence, as demonstrated by verified data, which shows that CAVA has either (1) achieved measurable increases in student academic achievement, as defined by at least one year's progress for each year in school, or (2) shown strong post-secondary outcomes, as defined by college enrollment, persistence, and completion rates equal to similar peers.

(See Educ. Code § 47607.2(a)(4).)

By satisfying the above criteria, the District's Board may, but is not required to, grant a renewal term of two years only.

b. Findings of Fact

The following include District staff's findings of fact concerning CAVA's designation as a low-performing charter school.

Finding of Fact No. 1: CAVA’s performance on state and local indicators demonstrate overall that it is performing below the state average. Additionally, the charter school has exhibited across-the-board declines on the most recent administration of the CAASPP.

The District has considered CAVA’s performance on a schoolwide basis and among the subgroups served by the charter school as identified on the Dashboard. District staff has determined that CAVA is well below most state and District standards, and is showing signs of decline on several critical indicators.

The District has considered CAVA’s performance on a schoolwide basis and among all student groups served by the charter school as identified on the Dashboard, giving greater weight to the charter school’s performance on measurements of academic performance. The District’s evaluation includes the data detailed in the Renewal Petition, and the results on the Dashboard, including the most recent release of the results for the 2023-2024 school year.

- English-Language Arts (“ELA”): **Orange** (52.5 points below standard, with a decrease of 13.9 points)
- Mathematics: **Orange** (83.9 points below standard, with a decrease of 6.6 points)
- English Learner Progress: **Red** (33.6% making progress toward English language proficiency, with a decrease of 14.7%)
- College/Career: **Yellow** (15.4% prepared, with an increase of 4.9%)
- Chronic Absenteeism: **Orange** (12.7% chronically absent with an increase of 1%)
- Suspension Rate: **Blue** (0% suspended at least once, with a maintain of 0%)
- Graduation Rate: **Yellow** (73.6% graduated, with an increase of 7.9%)

The District has analyzed CAVA’s student assessment data from the California Assessment of Student Performance and Progress (“CAASPP”) and used those results as a comparison against the statewide averages and the District.

English Language Arts.

When compared to its scores on the 2022 Dashboard—which did not receive performance colors due to the suspension of the California Assessment of Student Performance and Progress (“CAASPP”) and the lack of performance data for the 2019-2020 and 2020-2021 school years—CAVA experienced modest schoolwide gains in student academic achievement and performance in 2023. Additionally, between 2022 and 2023, CAVA experienced gains among its African American, White, and Socioeconomically Disadvantaged subgroups. However, there were declines among other subgroups, including Hispanic/Latino, Two+ Races, English Learners, and Students with Disabilities. Notably, the Two+ Race subgroup declined by nearly 50 points.

On the 2024 Dashboard, CAVA has shown recent declines among its student population on a schoolwide basis in ELA, with students performing 52.5 points below standard (representing a decline of 13.9 points). When compared to its scores on the 2023 Dashboard, CAVA also faced declines in ELA among its Hispanic, White, Asian, Two+ Races, English Learners, and

Socioeconomically Disadvantaged subgroups. Of particular severity was the decline of the White subgroup, which declined by 36.7 points. However, there were modest gains among the African American and Students with Disabilities subgroups, though both groups still performed well below the state average.

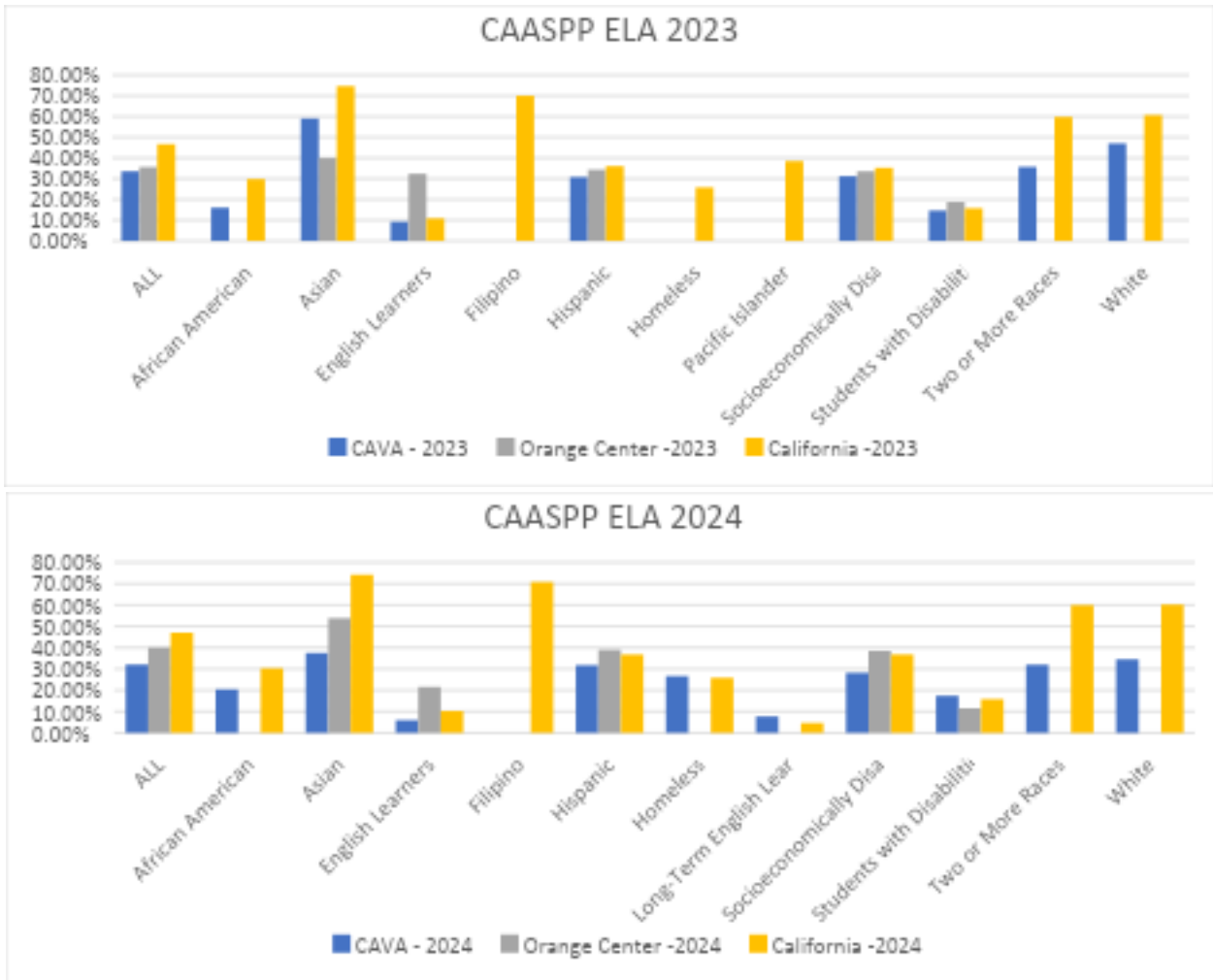
The following chart shows CAVA's performance on the 2019-2024 Dashboards in ELA both schoolwide and among its significant student group populations utilizing the "distance from standard" (or "DFS") metric. This metric evaluates how far, on average, students are from the lowest possible score for meeting standards. Comparing the beginning of the term to the end of the term, CAVA experienced a schoolwide decline between 2019 and 2024. Additionally, CAVA faced declines in ELA among its African American, Hispanic, Two+ Races, English Learner, and Socioeconomically Disadvantaged subgroups. There were only slight gains among the White and Students With Disabilities subgroups.

Student Group	2019 DFS ELA	2020 DFS ELA	2021 DFS ELA	2022 DFS ELA	2023 DFS ELA	2024 DFS ELA
All Students	-48.9	NO DATA	NO DATA	-41 (Low)	-38.6	-52.5
African American	-54.8	NO DATA	NO DATA	-85.8 (Very Low)	-76.2	-71.7
Hispanic/Latino	-43	NO DATA	NO DATA	-42.8 (Low)	-45.9	-53.4
White	-54.1	NO DATA	NO DATA	-30.6 (Low)	-14.5	-51.2
Asian	N/A*	NO DATA	NO DATA	-1.5	1.1	-25.9
Two+ Races	-69.5	NO DATA	NO DATA	-9.4	-58.5	-76.3
English Learner	-57.3	NO DATA	NO DATA	-68.6 (Low)	-82.7	-96.6
Socioeconomically Disadvantaged	-62.2	NO DATA	NO DATA	-50 (Low)	-44.7	-63.8
Students with Disabilities	-120	NO DATA	NO DATA	-116.7 (Very Low)	-126	-118.6

The next two graphs provide an additional snapshot of these declines based on a comparison of the 2023 and 2024 ELA administrations of the CAASPP, which include a comparison of CAVA's performance to that of students within the District and the state. It is important to keep in mind, however, that these data points reflect overall performance among students schoolwide and by student groups—without taking into account performance by grade level.

The 2023 graph demonstrates that CAVA scored below the District and statewide averages on a schoolwide basis in ELA. Additionally, CAVA fell below the statewide average among all subgroups, and was below the District average among all subgroups except for Asian students.

The 2024 graph demonstrates that CAVA scored below the District and statewide averages on a schoolwide basis in ELA. Additionally, CAVA was below the District and statewide average among all subgroups, except for Students with Disabilities and Homeless Students. The District notes, however, that according to the 2024 Dashboard, CAVA’s Students with Disabilities subgroup performed below the statewide average (118.6 points below standard compared to 95.6 points below standard, respectively). Therefore, CAVA’s reflection of this data point is incorrect.



When comparing CAVA’s performance against the statewide average on the 2024 ELA portion of the CAASPP, CAVA fell below the statewide average by about 40 points on a schoolwide basis. As indicated in the chart below, CAVA also fell significantly below the state averages in every subgroup that received a performance color.

Student Group	2024 DFS ELA (State)	2024 DFS ELA (CAVA)
All Students	-13.2	-52.5
African American	-58.9	-71.7
Hispanic/Latino	-39.3	-53.4
White	19.2	-51.2
Asian	60.7	-25.9
Two+ Races	24.3	-76.3
English Learner	-67.6	-96.6
Socioeconomically Disadvantaged	-40.9	-63.8
Students with Disabilities	-95.6	-118.6

CAVA continues to perform below the state average in ELA, and has shown consistent declines across most student subgroups over the past year, which is problematic.

Mathematics.

When compared to its scores on the 2022 Dashboard—which did not receive performance colors due to the suspension of the CAASPP and the lack of performance data for the 2019-2020 and 2020-2021 school years—CAVA experienced declines in student academic achievement and performance in 2023. Between 2022 and 2023, CAVA experienced declines among its African American, Asian, Hispanic/Latino, Two+ Races, English Learners, and Students with Disabilities subgroups. The only group that showed marginal improvement was the White subgroup (with an increase of 4.4 points), while the Socioeconomically Disadvantaged subgroup maintained its status (with a slight decrease of 0.1 points).

On the 2024 Dashboard, CAVA has shown even further declines among its student population on a schoolwide basis in Mathematics. When compared to its scores on the 2023 Dashboard, CAVA faced additional declines in academic achievement among its White, Asian, Two+ Races, English Learners, and Socioeconomically Disadvantaged subgroups. The only improvement was among the Students with Disabilities subgroup, which realized an increase of 21.9 points but still remained at 135.5 points below standard.

The following chart shows CAVA's performance on the 2019-2024 Dashboards in Mathematics both schoolwide and among its significant student subgroup populations utilizing the DFS metric. As explained above, this metric evaluates how far, on average, students are from the lowest possible score for meeting standards.

Student Group	2019 DFS Math	2020 DFS Math	2021 DFS Math	2022 DFS Math	2023 DFS Math	2024 DFS Math
All Students	-111.5	NO DATA	NO DATA	-75.5 (Low)	-77.3	-83.9

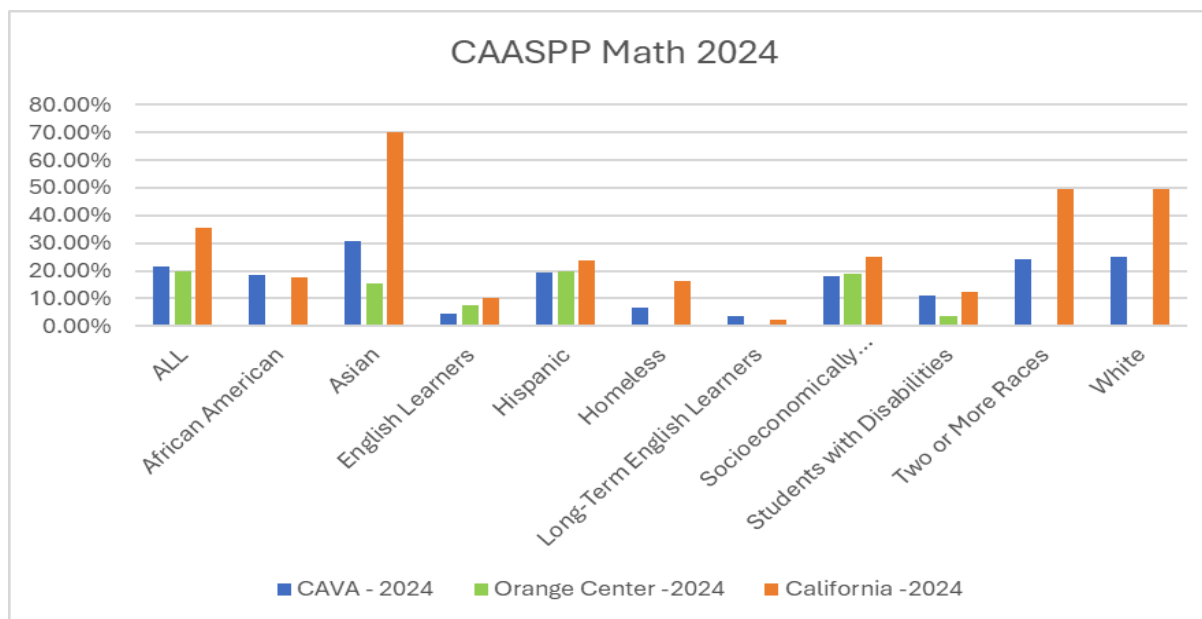
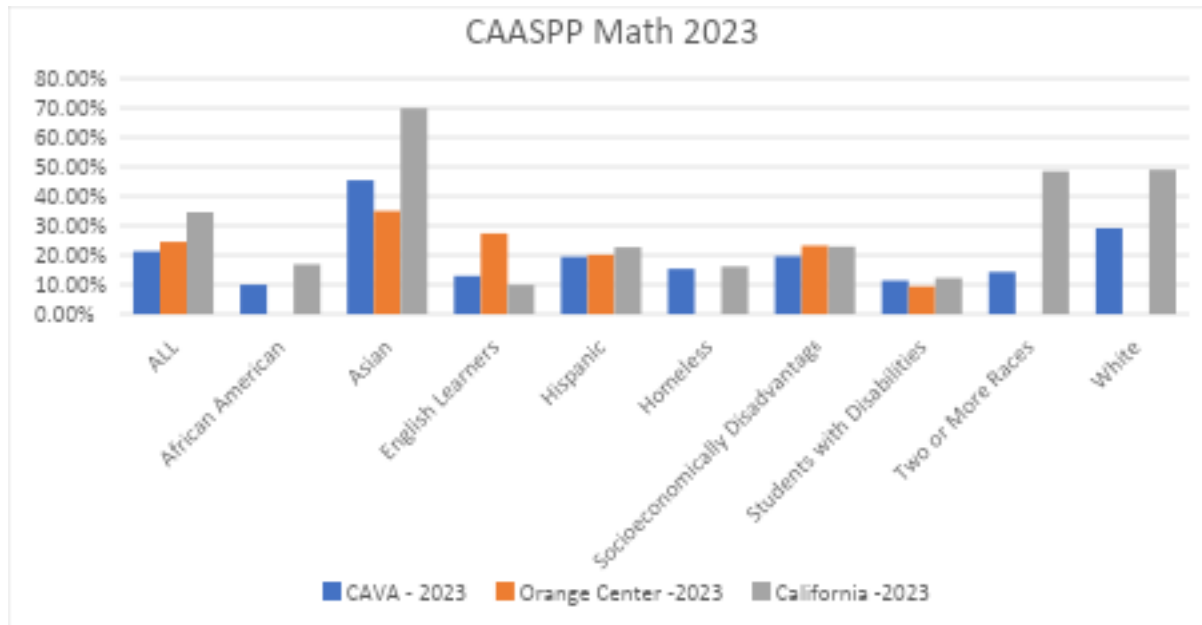
African American	-131	NO DATA	NO DATA	-107.8 (Very Low)	-113.9	-122.6
Hispanic/Latino	-110.9	NO DATA	NO DATA	-77.8 (Low)	-81.9	-84.5
White	-111	NO DATA	NO DATA	-66.6 (Low)	-62.2	-76.6
Asian	N/A*	NO DATA	NO DATA	- 8.3	-37.1	-70.4
Two+ Races	-144	NO DATA	NO DATA	- 82.8	-93.3	-97
English Learner	-143.3	NO DATA	NO DATA	-94.9 (Low)	-109.2	-124.9
Socioeconomically Disadvantaged	-120.3	NO DATA	NO DATA	-85.3 (Low)	-85.3	-92.1
Students with Disabilities	-147	NO DATA	NO DATA	-138.8 (Very Low)	-157.4	-135.5

As reflected above, while there were some modest improvements in student subgroup scores when comparing data sets from 2019 to 2024, there were wholesale declines both schoolwide and across all student subgroups from 2022 to 2024, with the limited exception of Students with Disabilities. However, even this subgroup's gains were minimal (i.e., 138.8 points below standard in 2022 compared to 135.5 points below standard in 2024).

The next two graphs provide an additional snapshot of these declines based on a comparison of the 2023 and 2024 Mathematics administrations of the CAASPP, which include a comparison of CAVA's performance to that of students within the District and the state. Again, it is important to keep in mind, that these data points reflect overall performance among students schoolwide and by student groups—without taking into account performance by grade level.

The 2023 graph demonstrates that CAVA scored below the District and statewide averages on a schoolwide basis in Mathematics. Additionally, CAVA fell below the statewide average among all subgroups (except for the English Learner subgroup), and fell below the District average among all subgroups, except for the Asian and Students with Disabilities subgroups (again keeping in mind that CAVA serves students in high school but the District does not).

The 2024 graph demonstrates that CAVA scored below the statewide averages on a schoolwide basis in Mathematics, but was slightly above the District average. Additionally, CAVA was below the statewide average among all subgroups, except for the African American subgroup. Because the District does not serve a high school population and did not have reported scores for the African American, Homeless, Two+ Races, or White subgroups, it's difficult to draw exact comparisons between CAVA's and the District's respective performances on this metric.



When comparing CAVA's performance against the state averages on the 2024 Mathematics portion of the CAASPP, CAVA fell below the state average by about 36 points on a schoolwide basis. As reflected below, CAVA also fell significantly below the state averages in every individual subgroup that received a performance color.

Student Group	2024 DFS Math (State)	2024 DFS Math (CAVA)
All Students	-47.6	-83.9
African American	-102.2	-122.6

Hispanic/Latino	-79.2	-84.5
White	-10.3	-76.6
Asian	49.5	-70.4
Two+ Races	-5.3	-97
English Learner	-93.4	-124.9
Socioeconomically Disadvantaged	-78.2	-92.1
Students with Disabilities	-124.3	-135.5

CAVA continues to perform below the state average in Mathematics, and has shown consistent declines across all student groups, except Students with Disabilities, over the past year. Taken together with its performance on the ELA portion of the CAASPP, these declines in student outcomes are unacceptable.

English Language Progress Indicator.

On the English Learner Progress Indicator (“ELPI”), in 2022, 38.1% of English Learners were making progress towards English language proficiency, which resulted in CAVA’s placement in the “low” designation on the Dashboard. In 2023, 48.2% of English Learners were making progress toward English language proficiency, resulting in an increase of 10.1% and a performance color designation of “green.” However, CAVA’s English Learner progress sharply declined by 14.7% on the 2024 Dashboard—with only 33.6% making progress toward English language proficiency. CAVA noted in the Renewal Petition that in 2024 there was a seventy-five percent (75%) increase in the number of English Learners served at CAVA, who were tested for the first time as new enrollees. In addition, CAVA reported that 57% of the English Learners who did not demonstrate language proficiency growth were newly enrolled in CAVA. This appears to be accurate based on the 2023 Dashboard results reflecting a total of 85 students, and the 2024 Dashboard results reflecting a total of 149 students, documented on the ELPI.

The following chart was included in CAVA’s Renewal Petition and reflects its performance on the ELPI compared to the Fresno Unified School District, the District, and state’s performance on the same indicator. As shown below, CAVA was outperformed by the District and the state in both 2023 and 2024:

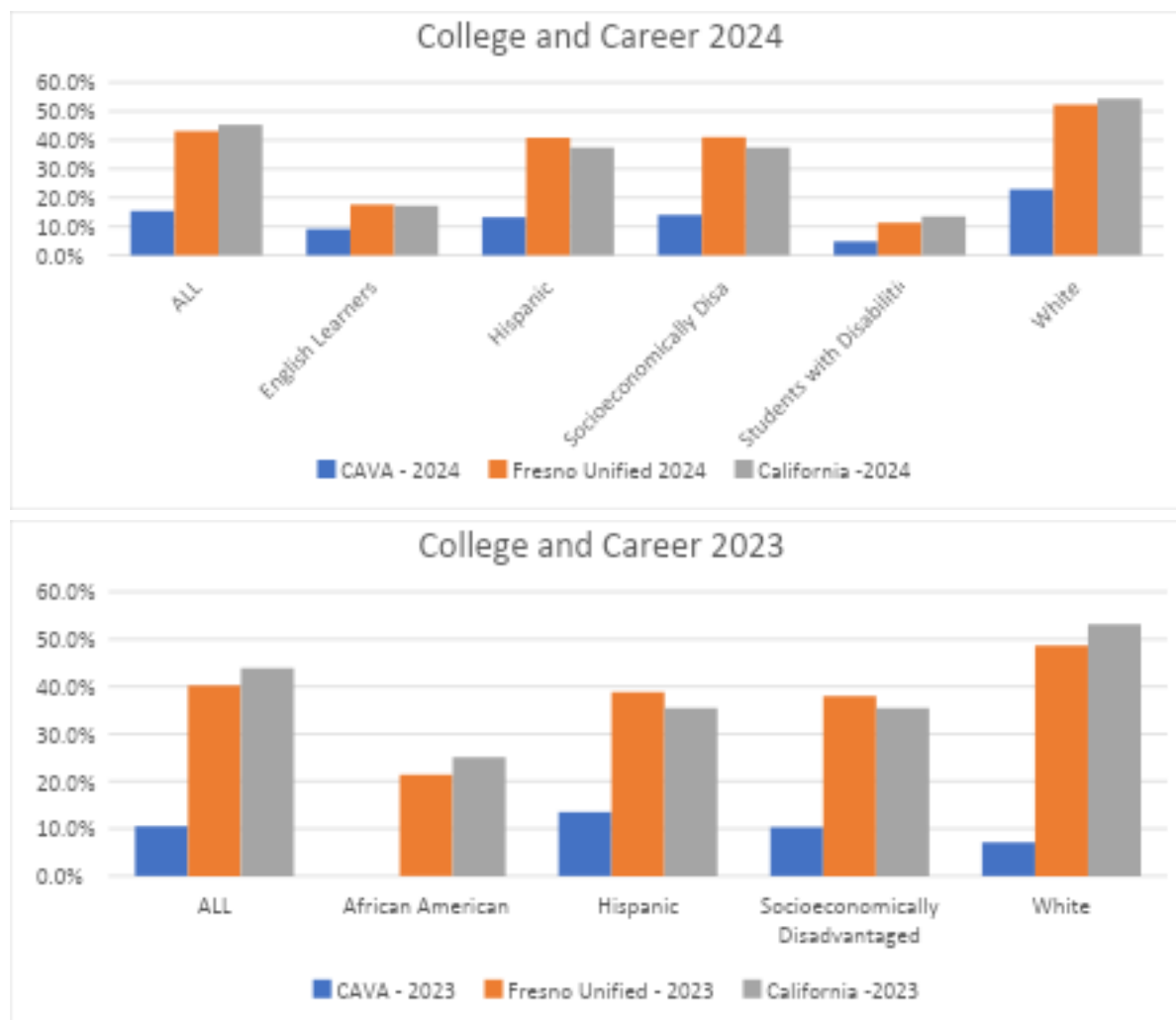
English Learner Progress	CAVA - 2024	Fresno Unified	Orange Center -2024	California -2024
English Learners	33.6%	40.2%	46.8%	45.7%
Long-Term English Learners	36.3%	35.9%	44.4%	45.8%
English Learner Progress	CAVA - 2023	Fresno Unified	Orange Center -2023	California -2023
English Learners	48.2%	46.8%	59.6%	48.7%

Although CAVA’s percentage of students making progress toward English language proficiency can, in part, be explained by new enrollees to the program, the significant decline is still notable

and calls into question the adequacy of CAVA's English Language Development program, instructional supports, and services for students designated as English Learners.

College/Career Indicator.

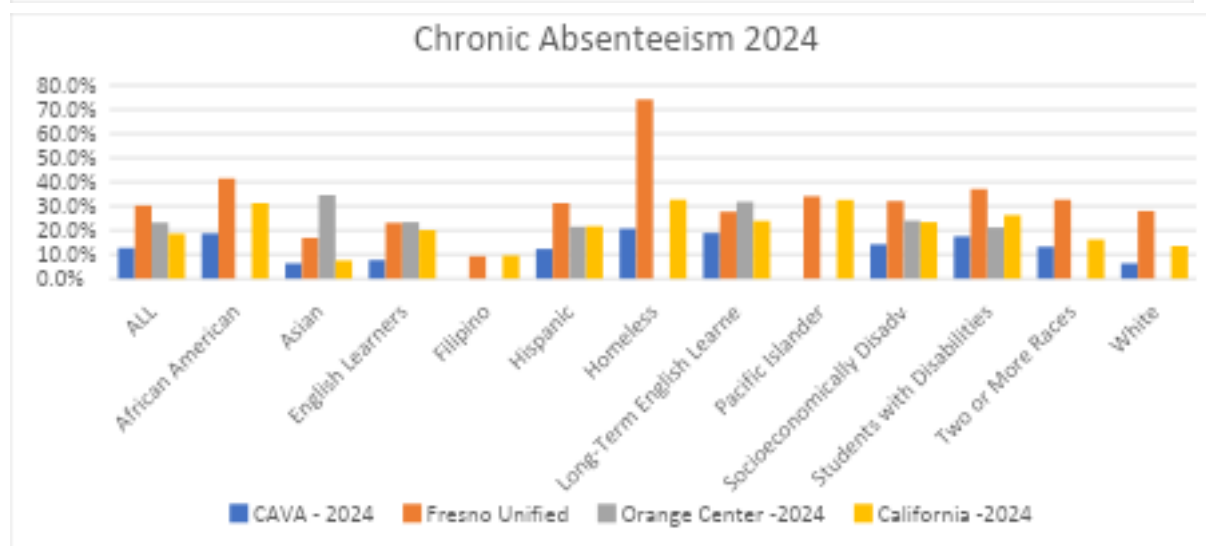
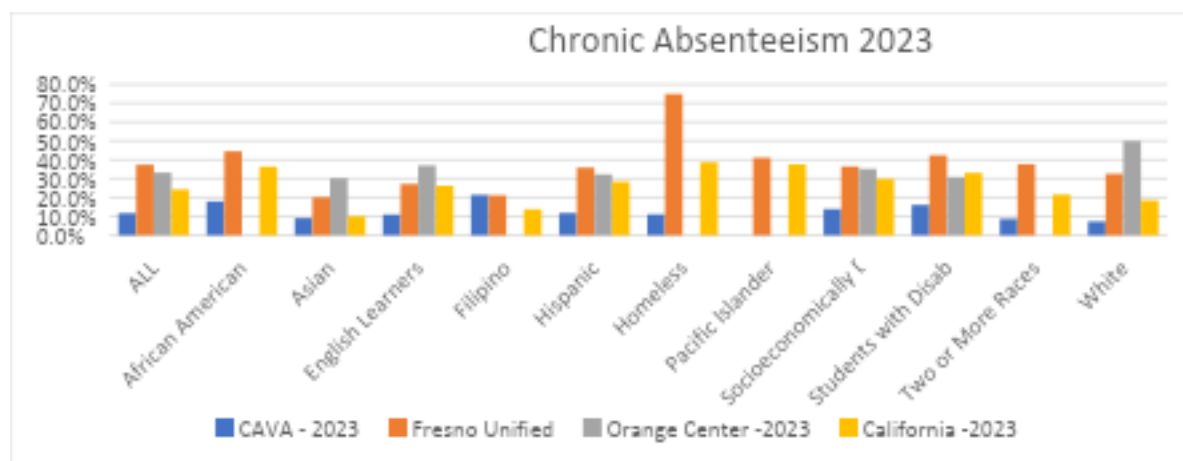
CAVA's was assigned a performance color of "yellow" on the 2024 Dashboard for the College/Career Indicator, with 15.4% of its students considered prepared. Although CAVA experienced an increase of 4.9% on this metric compared to its performance on the 2023 Dashboard, this is an area of concern for the District, as it is significantly well below the state average of 45.3%. The following charts show CAVA's College and Career preparedness rate among students schoolwide and by reported student groups for 2023 and 2024. As reflected below, CAVA's performance on this indicator both schoolwide and among all reported subgroups is significantly lower than the performance of students enrolled in Fresno Unified School District (which CAVA used for comparative purposes because the District does not serve a high school population) and within the state.



The District remains very concerned with CAVA's poor results on this indicator, which demonstrates that the vast majority of its secondary student population are ill-prepared for post-secondary college and career life.

Chronic Absenteeism.

On the 2024 Dashboard, CAVA was assigned a performance color of “orange” for chronic absenteeism, with 12.7% of students reported as chronically absent. This indicator shows that CAVA's rate of chronic absenteeism slightly worsened by 1% compared to the prior year. As shown below, CAVA is performing more favorably in this category on a schoolwide basis and among its student groups when compared to Fresno Unified School District, the District, and the state. However, its chronic absenteeism rate still remains relatively high and indicates room for improvement.



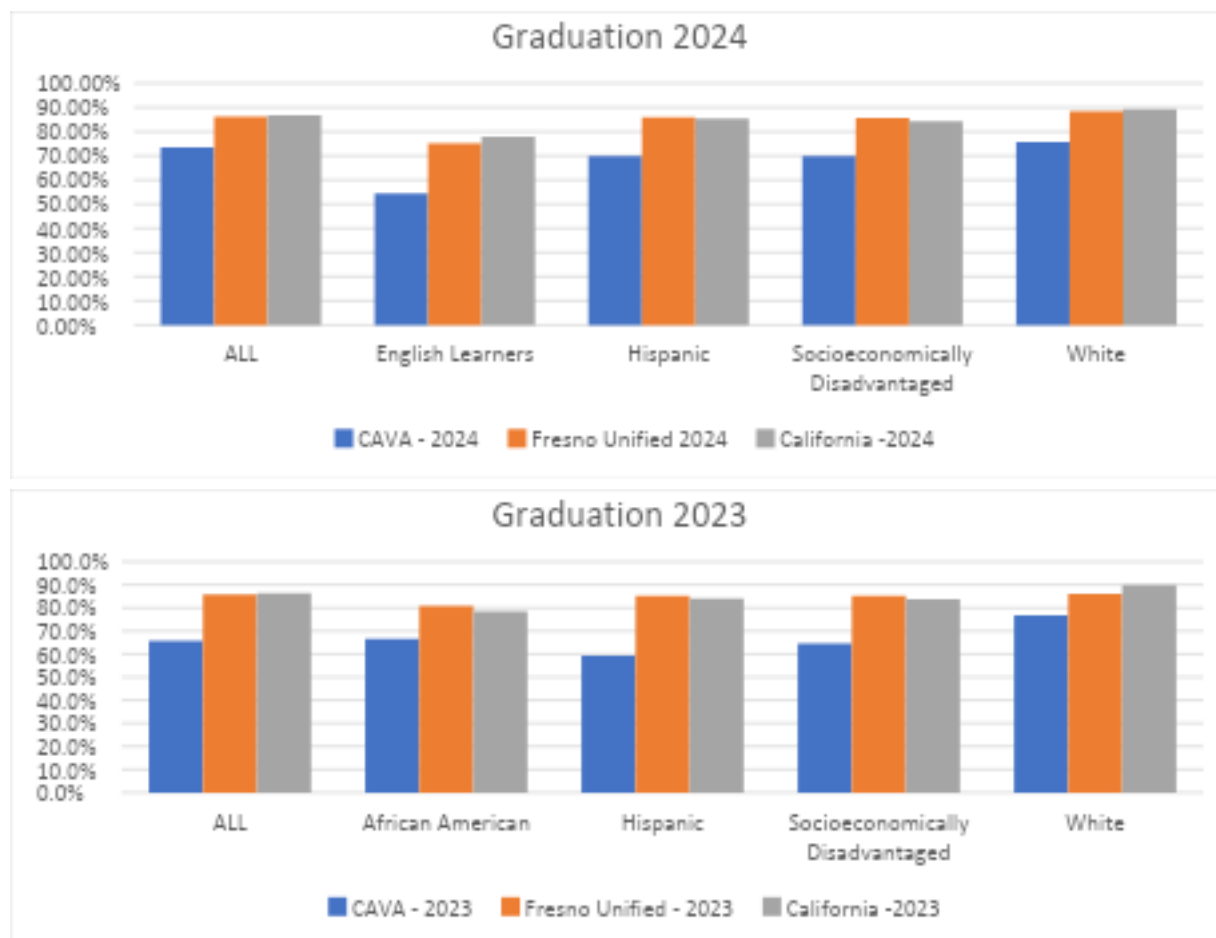
Suspension Rate.

For the suspension rate, CAVA was given a “blue” designation due to a suspension rate of 0%. This is commendable.

Graduation Rate.

On the 2024 Dashboard, CAVA was assigned a performance color of “yellow” for its graduation rate, reflecting 73.6% of students who graduated. This indicator shows that CAVA increased its performance on this metric from the prior year by 7.9%. Although the District recognizes the improvement in CAVA’s graduation rate, it still remains below the statewide average graduation rate of 86.7%, as well as Fresno Unified School District’s graduation rate of 86.2%. CAVA’s graduation rate was also below the state and Fresno Unified School District in all reported subgroups on the 2023 and 2024 Dashboards.

The following charts show CAVA’s graduation rate among students schoolwide and by reported student groups for 2023 and 2024, which are reflected in its Renewal Petition:



Local Indicators. CAVA met all standards on the local indicators, including teachers, instructional materials and facilities; implementation of academic standards; parent and family engagement; local climate survey; and access to a broad course of study.

Based on an analysis of the above data and other information, the District has determined that CAVA is a low-performing charter school, with consistent declines in almost all academic categories both schoolwide and among its student subgroup populations. In addition, and as described in further detail below, CAVA's Renewal Petition and recently-submitted corrective action plan inadequately address and fail to provide reasonably comprehensive descriptions of how CAVA is taking meaningful steps to address the underlying causes of its low performance.

For these reasons, the District has determined, giving greater weight to CAVA's performance on measurements of academic performance, that CAVA's Renewal Petition should be denied.

Finding of Fact No. 2: There is a lack of clear and convincing evidence, as demonstrated by verified data, showing that CAVA has achieved measurable increases in student academic achievement as defined by at least one year's progress for each year in school.

District staff has determined that CAVA has not sufficiently demonstrated that it has achieved measurable increases in student academic achievement, defined by at least one year's progress for each year in school, based on the verified data submitted with the Renewal Petition and in its corrective action plan.

In addition to CAASPP assessment data, CAVA provided internal assessment data reflecting its use of the Renaissance STAR 360 assessments. The Renaissance STAR 360 has been identified by the CDE as an academic progress indicator that is on the State Board of Education-approved verified data list.

However, the specific data points that CAVA provided for the STAR 360 were vague and ill-defined. CAVA's corrective action plan includes Math and ELA "State Proficiency Rates" with little explanation, as well as "State Growth Rates" with little discussion of established benchmarks from which growth or progress is measured. CAVA also broke down student performance based on grade-level spans, but did not show a comparison of student performance against the student subgroups reflected on the Dashboard, except for Students with Disabilities (designated as "SPED") and English Learners (designated as "ELD").

Additionally, the data covered only the end of the 2023-2024 school year through February 2025, with no additional analysis for student performance at least from the start of the 2023-2024 school year. Consequently, this limited reporting timeframe prevents the District from meaningfully assessing student academic growth across school years to determine whether CAVA's students showed measurable increases demonstrated by *at least one year's progress* for each year in school, as required by statute. The data sets and analysis included in CAVA's Renewal Petition and corrective action plan are addressed in further detail below.

Relatedly, the District notes that CAVA included a student enrollment count by grade level in its corrective action plan, which shows a total of 1,850 students from TK through grade 12 as of April 22, 2025. However, according to the Renewal Petition, for the 2025-2026 school year, CAVA projects a total student enrollment of 1,560—nearly 300 students less than the figure specified in the corrective action plan. In addition, CAVA’s multi-year projection assumptions included in CAVA’s first interim budget report for 2024-2025 reflect an estimated enrollment of 1,587 for 2024-2025 and an estimated enrollment of 1,603 for 2025-2026. Considering the inconsistency in these enrollment figures, the District questions the accuracy of the data included in the corrective action plan and whether it correctly reflects the test results of the students enrolled in the charter school. With that caveat, the District provides its analysis of CAVA’s presentation of verified data below.

STAR 360 ELA and Mathematics “Proficiency Rates”

CAVA provided ELA and Mathematics STAR 360 “Proficiency Rates” in its corrective action plan for the following student cohorts: grades TK-2, grades 3-5, Middle School (MS), High School (HS), Special Education students (SPED) and English Learners (ELD). Additionally, each group was evaluated in three timeframes: (1) the end of the 2023-24 school year (EOY 23-24), (2) the beginning of the 2024-25 school year in September (BOY 9/9), and (3) the middle of the 2024-25 school year in February (MOY 2/7/25).

The ELA portion of CAVA’s corrective action plan lacks foundation and detail for purposes of interpreting this data, and the plan does not appropriately analyze the data in relation to comparable benchmarks. As indicated in the charts below, the data shows an increase in CAVA’s schoolwide ELA proficiency from the end of the 2023-2024 school year to the beginning of the 2024-2025 school year in September, which is then followed by an overall decline in the proficiency rate in February 2025. It is also unclear why there was a spike in the beginning of the year proficiency rate at a time when students were returning to school from summer break. The District finds this pattern concerning, as students schoolwide increased in proficiency by approximately 6% immediately following the summer break, but then dropped in proficiency by about 4% by the middle of the school year. Taken at face value, and without a meaningful explanation provided in the corrective action plan as to what CAVA considers to be “year-end proficiency expectations,” the data does not provide clear and convincing evidence of at least one year’s progress for each year in school.

All	ELA State Proficiency- Met	EOY 23-24	35.95%	BOY 9/9	41.34%	MOY 2/7/25	37.47%
TK-2	ELA School Proficiency- Prof/ Adv	EOY 23-24	51.39%	BOY 9/13/25	50.69%	MOY 2/7/25	47.77%
3-5	ELA State Proficiency- Met	EOY 23-24	36.20%	BOY 9/9/25	37.90%	MOY 2/7/25	38.95%
MS	ELA State Proficiency- Met	EOY 23-24	39.70%	BOY 9/9/25	37%	MOY 2/7/25	37.89%
HS	ELA State Proficiency- Met	EOY 23-24	53.80%	BOY 9/9/25	55.21%	MOY 2/7/25	56.42%
SPED	ELA State Proficiency- Met	EOY 23-24	19.35%	BOY 9/13/25	21.83%	MOY 2/7/25	23.17%
ELD	ELA State Proficiency- Met	EOY 23-24	12.36%	BOY 9/9/25	23.58%	MOY 2/7/25	24.42%

By contrast, on a schoolwide basis, the Mathematics portion of the STAR 360 shows a slight decrease in proficiency from the end of the 2023-2024 school year to the beginning of the 2024-2025 school year in September, which is then followed by an increase in proficiency in February 2025. Again, as with the ELA portion of the STAR 360, CAVA does not meaningfully address the significance of these fluctuations in student performance. More concerning is the fact that the narrative included in the corrective action plan addressing what CAVA purports to be student “growth” does not align with the data points included in its charts. For example, CAVA indicated “notable progress” in the overall Mathematics proficiency growth at the high school level of 56.6% and in TK-2 of 36.47%. However, these percentages are not reflected in the chart for Mathematics and, instead, appear to show high school proficiency at 21.52% and TK-2 proficiency at 53.13%.

All	Math State Proficiency- Met	EOY 23-24	23.07%	BOY 9/9/25	22.83%	MOY 2/7/25	26.31%
TK-2	Math School Proficiency- Prof/ Adv	EOY 23-24	53.13%	BOY 9/13/25	50%	MOY 2/7/25	55.10%
3-5	Math State Proficiency- Met	EOY 23-24	21.30%	BOY 9/9/25	27.70%	MOY 2/7/25	25.32%
MS	Math State Proficiency- Met	EOY 23-24	24.77%	BOY 9/9/25	21.65%	MOY 2/7/25	26.92%
HS	Math State Proficiency- Met	EOY 23-24	21.52%	BOY 9/9/25	23.41%	MOY 2/7/25	24.12%
SPED	Math State Proficiency- Met	EOY 23-24	9.68%	BOY 9/13/25	15.28%	MOY 2/7/25	13.51%
ELD	Math State Proficiency- Met	EOY 23-24	8.43%	BOY 9/9/25	14.63%	MOY 2/7/25	22.09%

This is just one example of others where CAVA’s reported proficiency growth percentages are either not aligned with the percentages reported in the corresponding charts, or CAVA fails to explain where it derived this data or the applicable benchmarks for purposes of measuring student proficiency and growth by school year or testing period. For this reason, the District cannot determine with any level of certainty that CAVA’s student population (both schoolwide and student subgroup populations reported on the Dashboard) showed measurable increases in academic achievement, as defined by at least a year’s worth of progress.

STAR 360 ELA and Mathematics “2023-24 State Proficiency Growth”

CAVA also included STAR 360 ELA and Mathematics “2023-24 State Proficiency Growth” charts in its corrective action plan as evidence of growth for the 2024-2025 school year. However, the corrective action plan does not indicate how it defines the “state proficiency” percentage utilizing this assessment measure. There is also reference to a “school proficiency” percentage for students in TK-2, which the District assumes is used because students in these grade levels are not assessed for purposes of reporting on the Dashboard (and thus there is no state comparison). Additionally, because CAVA only supplied end of year (EOY) 2023-2024 results on the STAR 360, the District cannot decipher how students performed over the course of the 2023-2024 school year.

As an example to illustrate how Petitioners interpret the State Proficiency Growth data, below is a snippet from page 2 of the corrective action plan concerning the 2024-2025 results:

In ELA, 46.56% of students in grades 3–12 were on track to meet growth goals, with middle school (49.06%) and ELD students (53.25%) leading the way. SPED students

showed encouraging progress in both subjects, with 43.29% on track in Math and 45.02% in ELA. These mid-year indicators reflect strong instructional impact and suggest students are well-positioned to meet or exceed year-end proficiency expectations.

CAVA does not elaborate on what the “growth goals” are, or otherwise explain how the data provides evidence of measurable increases in student academic achievement as defined by at least one year’s progress for each year in school.

Further, although CAVA includes broad benchmark percentages on pages 9-10 of the corrective action plan, CAVA does not explain the significance of these benchmarks, how they are calculated, or how CAVA determined that students made at least one year of growth based on such benchmark data.

The following charts show CAVA’s ELA and Mathematics State Proficiency Growth Rates by reported student groups for end of year (EOY) 2023-2024 and middle of year (MOY) 2024-2025, which are reflected in its corrective action plan:

Grow	3-12	ELA State Proficiency- Growth	EOY 23-24	43.48%
Grow	TK-2	ELA State Proficiency- Growth	EOY 23-24	58.28%
Grow	3-5	ELA State Proficiency- Growth	EOY 23-24	39.90%
Grow	MS	ELA State Proficiency- Growth	EOY 23-24	36.70%
Grow	HS	ELA State Proficiency- Growth	EOY 23-24	43.54%
Grow	SPED	ELA State Proficiency- Growth	EOY 23-24	37.70%
Grow	ELD	ELA State Proficiency- Growth	EOY 23-24	45.83%

Grow	3-12	ELA State Proficiency- Gain	MOY 2/7	46.56%
Grow	TK-2	ELA State Proficiency- Gain	MOY 2/7	42.31%
Grow	3-5	ELA State Proficiency- Gain	MOY 2/7	46.45%
Grow	MS	ELA State Proficiency- Gain	MOY 2/7	49.06%
Grow	HS	ELA State Proficiency- Gain	MOY 2/7	46.97%
Grow	SPED	ELA State Proficiency- Gain	MOY 2/7	45.02%
Grow	ELD	ELA State Proficiency- Gain	MOY 2/7	53.25%

Grow	3-12	Math State Proficiency- Growth	EOY 23-24	45.11%
Grow	TK-2	Math State Proficiency- Growth	EOY 23-24	36.47%
Grow	3-5	Math State Proficiency- Growth	EOY 23-24	39.50%
Grow	MS	Math State Proficiency- Growth	EOY 23-24	24.77%
Grow	HS	Math State Proficiency- Growth	EOY 23-24	56.60%
Grow	SPED	Math State Proficiency- Growth	EOY 23-24	31.69%
Grow	ELD	Math State Proficiency- Growth	EOY 23-24	39.58%

Grow	3-12	Math State Proficiency- Gain	MOY 2/7	47.18%
Grow	TK-2	Math School Proficiency- Gain	MOY 2/7	40.35%
Grow	3-5	Math State Proficiency- Gain	MOY 2/7	47.52%
Grow	MS	Math State Proficiency- Gain	MOY 2/7	50.24%
Grow	HS	Math State Proficiency- Gain	MOY 2/7	48.48%
Grow	SPED	Math State Proficiency- Gain	MOY 2/7	43.29%
Grow	ELD	Math State Proficiency- Gain	MOY 2/7	55.19%

CAVA provides an interpretation of this data through comparisons to various other data points throughout the corrective action plan. CAVA inconsistently relates proficiency levels to broad benchmarks, other CAVA groups, and state averages, but does not reference any baseline information or other details to be able to meaningfully understand the significance of these percentages or the purported gains across student grade spans or groups. Consequently, the District has no way to validate the data presented or confirm whether students have demonstrated at least a year's worth of progress for each year in school.

Additionally, while the District appreciates CAVA's effort to provide a corrective action plan that identifies the issues, root causes, and actions it intends to take to improve student outcomes beginning in the 2025-2026 school year, the lack of clear data analysis significantly restricts the District ability to evaluate the efficacy of such a plan.

Consequently, District staff does not find that CAVA presented clear and convincing evidence to demonstrate measurable increases in student academic achievement, as defined by at least a year of progress for each year in school, to support the reauthorization of CAVA's charter for a two-year term under Education Code section 47607.2(a)(6).¹

Thus, based on the above analysis, and giving greater weight to CAVA's performance on measurements of academic performance, District staff has determined that CAVA is ineligible for renewal due to its low-performing status.

2. Charter Petition Renewal Criteria Under Education Code Section 47605 / Findings of Fact

Education Code section 47607 provides that charter renewals are governed by the standards and criteria set forth in Education Code section 47605 and must include, but not be limited to, a reasonable comprehensive description of any new requirement of charter schools enacted into law after the charter was originally granted or last renewed.

¹ The District also notes that CAVA did not present clear and convincing evidence showing strong postsecondary outcomes, as defined by college enrollment, persistence, and completion rates equal to similar peers pursuant to Education Code section 47607.2(b)(3)(B). Therefore, the District did not analyze this criterion as a basis for considering CAVA's eligibility for a two-year renewal term.

a. Grounds for Denial

The governing board of a school district shall not deny a petition unless it makes written factual findings specific to the particular petition, setting forth specific facts to support one or more of the following findings:

1. The charter school presents an unsound educational program for the students to be enrolled in the charter school.
2. The petitioners are demonstrably unlikely to successfully implement the program set forth in the petition.
3. The petition does not contain the number of signatures required by subdivision (a) of Education Code section 47605. *(The signature requirement is **not** applicable to a renewal petition.)*
4. The petition does not contain an affirmation of each of the required conditions.
5. The petition does not contain reasonably comprehensive descriptions of all required elements.
6. The petition does not contain a declaration of whether or not the charter school shall be deemed the exclusive public school employer of the employees of the charter school for purposes of the Educational Employment Relations Act.
7. The charter school is demonstrably unlikely to serve the interests of the entire community in which the school is proposing to locate. *(This finding is **not** applicable to a renewal petition.)*
8. The school district is not positioned to absorb the fiscal impact of the proposed charter school. *(This finding is **not** applicable to a renewal petition.)*

b. Findings of Fact

The District conducted a comprehensive review of CAVA's Renewal Petition, which included a detailed analysis of its educational program, measurable student outcomes and methods for measuring student progress, fiscal and governance structures, student admissions and discipline, labor and personnel issues, facilities and operations, and legal issues. Overall, as detailed below, the Renewal Petition generally includes reasonably comprehensive descriptions of the required legal elements, with certain noted deficiencies and omissions.

Below, District staff presents its findings of fact addressing the general categories of review.

Finding of Fact No. 3: The Renewal Petition, as written, generally presents a sound educational program for the students enrolled in the charter school, but CAVA's

low-performing status calls into question whether the educational program provides a meaningful benefit to students.

CAVA's Renewal Petition, as written, generally reflects a program that is consistent with sound educational practice. However, CAVA has experienced across-the-board declines in ELA, Mathematics, English Learner progress, and other critical areas that demonstrate an overall lack of educational soundness in the operation of its program.

As a nonclassroom-based charter school program without a school campus, parents or responsible adults are tasked with guiding students through coursework at home or in a small group setting. Students access lessons and lesson assessments, and parents/responsible adults track academic progress through the "K12® Online School." According to the Renewal Petition, a credentialed teacher oversees each student's educational program by reviewing the student's work for quality, accuracy, and understanding, and by communicating with parents or guardians regularly.

The Renewal Petition details the manner in which CAVA addresses the needs of its students and specific student groups enrolled within the charter school. CAVA states that it employs a team-based instructional approach with parents/responsible adults and credentialed teachers who facilitate the educational program for the enrolled students. The Renewal Petition also discusses the teaching and pedagogical strategies used to support the instructional theories and approaches underlying CAVA's educational program. CAVA expresses a commitment to improving student outcomes and providing its students with rigorous, standards-aligned instruction that is simultaneously designed to meet their social-emotional and other individualized needs.

The instructional program, if implemented with fidelity and in alignment with the Renewal Petition, appears to be consistent with sound educational practice and designed in a manner to address the needs of identified student groups. However, it is only through a commitment to providing students with a high quality, rigorous instructional program that students will experience improvements in academic achievement and performance. In addition, if CAVA does not ensure the provision of effective and ongoing professional development opportunities and training, teaching staff and responsible adults will not be equipped to facilitate student instruction and learning through the use of strategies, interventions, and supports needed to foster academic growth.

District staff notes that a comprehensive description of the independent study program is significantly lacking. Specifically, CAVA's assurances regarding the manner in which it will ensure compliance with independent study requirements is reduced to a single paragraph within the Renewal Petition and does not demonstrate CAVA's knowledge and understanding of the requirements applicable to independent study. In addition, the Renewal Petition does not include a copy of CAVA's independent study master agreement or other supporting documentation reflecting its compliance with this program model. Even if CAVA's other

resources (e.g., parent/student handbook) address independent study requirements, the Renewal Petition should have included a greater level of detail regarding the administration of this program to ensure legal compliance.

Overall, while the District recognizes that the Renewal Petition generally describes a sound educational program for CAVA students, the poor year-over-year student performance schoolwide and among student subgroup populations on the state indicators gives the District reason to believe that the program is not being implemented with fidelity or consistency. Even with a corrective action plan, District staff does not have confidence that CAVA will be able to reverse the across-the-board low proficiency and poor outcomes of enrolled students in a manner that ensures they will make meaningful progress toward grade-level proficiency. As the chartering authority, it is imperative that a charter school operating under the District's oversight demonstrate that it is meeting the academic and social-emotional needs of students in an environment that is conducive to learning and attaining measurable academic growth. Unfortunately, the student performance data tells a different story and, therefore, District staff lacks confidence that CAVA is effectively implementing a sound educational program in a manner that aligns with the description of the program in the Renewal Petition.

Finding of Fact No. 4: The Petitioners are demonstrably unlikely to successfully implement the program.

The District has determined that CAVA is demonstrably unlikely to successfully implement the charter school program.

As part of its analysis of this element, the District conducted a review of various financial documents provided with the Renewal Petition including CAVA's adopted budget, cash flow, multi-year projection assumptions ("MYP"), and budget narrative. The MYP includes projections for the 2025-2026 and 2026-2027 school years.² Below is an analysis of certain key elements of the financial documentation.

Attendance and Enrollment

The most significant portion of a charter school's funding is based on average daily attendance ("ADA"). CAVA projects an enrollment of 1,603 total students for the 2025-2026 fiscal year, and a modest increase to 1,619 total student enrollment for fiscal year 2026-2027. CAVA has used a 95% attendance rate for forecasting and budgeting purposes. These estimates appear reasonable, although the Renewal Petition's enrollment projections are inconsistent with the MYP budget projections and figures included in its corrective action plan.

² The financial documentation should have included at least three years' worth of financial projections and cash flow, consistent with Education Code section 47605(h).

Deficit Spending / Ending Fund Balance / Reserve for Economic Uncertainties

A reserve for economic uncertainties (“REU”) is the Unrestricted Ending Fund Balance divided by total expenditures. It is generally recommended that an LEA of similar enrollment size maintain an REU equal to 3% of expenditures. CAVA is projected to maintain an REU above 9% in all projection years.

Cash Flow

Charter schools generally should maintain a cash balance between 30- and 60-days cash on hand. CAVA’s ending fund balance for fiscal year 2025-2026 is projected to be \$2,755,334, and for fiscal year 2026-2027 is projected to be \$3,708,205. Although these projections should have been updated for purposes of the submission of the Renewal Petition (and not pulled from CAVA’s first interim report), these ending cash balances appear to reflect a positive fiscal status to indicate that CAVA would be expected to meet its financial obligations for the current and two subsequent fiscal years.

There have been no notices of concern or notices of violation issued regarding substantial fiscal or governance concerns. Based on the ongoing comprehensive financial review of CAVA, the District has not identified any substantial fiscal factors that would prevent it from successfully implementing the program.

The District notes, however, that from an educational program perspective, the poor student outcomes over the current charter term undermine CAVA’s likelihood of successfully implementing its charter program if the Board granted a two-year term. The District is concerned that the ongoing, low student academic achievement and performance outcomes could ultimately result in student and/or staff attrition because the charter school is not meeting the educational needs of these students. In addition, as addressed in Finding of Fact No. 3, District staff lacks confidence in CAVA’s ability to ensure students are receiving a sound education that is aligned with the principles set out in the Renewal Petition.

For these reasons, although CAVA’s financial status and operations appear sound, the District finds it unlikely that CAVA would be able to successfully implement a sound and effective educational program or otherwise measurably improve student academic outcomes given its history of poor performance. Again, the District appreciates that CAVA prepared a corrective action plan at the District’s request and as required by statute. However, this cannot be done as an afterthought. CAVA should have been proactively addressing the low proficiency rates and lack of college/career preparedness well before its charter came up for renewal. The District did not see any meaningful efforts indicating that CAVA was laser-focused on improving scores, and its Renewal Petition and the renewal justification contained therein did not give District staff the impression that this was a top priority.

Finding of Fact No. 5: The Renewal Petition contains affirmations of the required conditions.

The Renewal Petition includes all required affirmations and assurances.

Finding of Fact No. 6: The Renewal Petition provides reasonably comprehensive descriptions of the required elements set forth in Education Code section 47605.

Based on an analysis of the Renewal Petition by District staff, the Renewal Petition generally provides reasonably comprehensive descriptions of the required elements set forth in Education Code section 47605. However, the review team has identified some issues/concerns with certain elements described in the Renewal Petition, as detailed below.

1. Measurable Student Outcomes. The Renewal Petition includes a list of measurable student outcomes that are intended to align with the eight state priorities. However, the goals, actions to achieve those goals, and measurable outcomes are vague and do not include specific growth metrics or percentages to track student progress. This is especially concerning with respect to State Priority #4, which addresses student achievement with respect to ELA/literacy, mathematics, and English language proficiency. In several instances, the measurable outcomes includes a blank percentage of students meeting or making progress toward a certain goal (e.g., “% of students scoring below grade level on the Star360 beginning-of-the-year assessment demonstrated one or more years of growth on the end-of-year assessment” or “[i]ncrease the percentage of EL [sic] being reclassified as Fluent English Proficient”). For the corresponding method of measurement, CAVA references the local control and accountability plan (“LCAP”) for “specific measurements.” However, the LCAP included in the appendix to the Renewal Petition is for the 2024-2025 school year and contains prior student data. Given that CAVA had access to the 2024 Dashboard data prior to the submission of the Renewal Petition, the District expected that CAVA would have developed thoughtful, robust measurable student outcomes to address the significant gaps in student achievement across its grade-level spans. Instead, CAVA only included boilerplate language in the Renewal Petition, giving the impression that CAVA did not give careful attention to, or otherwise prioritize, the development of measurable student outcomes, goals, and methods of measurement that would be designed to improve student performance in ELA, mathematics, and English language proficiency.
2. Health and Safety Procedures. The Renewal Petition is missing an assurance that, on or before June 30, 2025, CAVA will comply with Education Code section 53008 regarding assessing students in kindergarten and grades 1 and 2 for risk of reading difficulties using the screening instrument(s) adopted by the charter school’s governing board. The Renewal Petition also does not affirm that CAVA will notify students and parents/guardians no less than twice during the school year on how to access available pupil mental health services pursuant to Education Code section 49428.

3. Dispute Resolution Procedures. The Renewal Petition includes a description of CAVA's dispute resolution procedures applicable to disputes between the District and CAVA, and, it provides a link to the charter school's Uniform Complaint Procedures. However, this element does not describe a process for resolving internal disputes or complaints among CAVA employees.
4. Independent Study Requirements. As a nonclassroom-based program that implements an independent study model, the Renewal Petition fails to include a comprehensive description of CAVA's understanding and application of the independent study requirements set forth in the Education Code. CAVA includes a single sentence in the Renewal Petition stating that it complies with Education Code sections 51745 et seq., but the Renewal Petition should have included a detailed explanation of the policies, procedures, and practices that CAVA implements in alignment with those specific requirements. CAVA should have provided a more in-depth, comprehensive description of this instructional model with the relevant assurances in its Renewal Petition, especially considering that CAVA's entire educational program model is centered around this method of instruction.

Finding of Fact No. 7: The Renewal Petition includes a declaration that CAVA shall be deemed the exclusive public school employer of the employees of the charter school.

The Renewal Petition confirms that CAVA shall serve as the exclusive public school employer of the employees of CAVA for purposes of the Educational Employment Relations Act.

Finding of Fact No. 8: The Renewal Petition generally satisfies other key areas related to the operations, facilities, and other potential effects of CAVA.

Overall, the Renewal Petition satisfies other key areas related to the operations, facilities, and other potential effects of CAVA. The District recognizes that CAVA utilizes a nonclassroom-based independent study instructional model and does not require facilities to operate its program. The Renewal Petition affirmatively states that the only facility operated by CAVA is a central administrative office located in Simi Valley, California.

District Staff Recommendation

Based on District staff's analysis of the above-described criteria for renewal and the corresponding Findings of Fact Nos. 1-8, District staff has determined that CAVA does not meet the minimum criteria to be eligible for Renewal Petition for the requested two-year term beginning on July 1, 2025 and ending on June 30, 2027. Specifically, even though the Renewal Petition, as written, is generally comprehensive and meets most of the required elements, CAVA's designation as a low-performing charter school, coupled with District staff's determination that CAVA did not present clear and convincing evidence to support a two-year

renewal, renders the charter school ineligible for renewal. Therefore, the District recommends that the Board deny the Renewal Petition.

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