



**Renewal Petition Staff Report
Gateway College & Career Academy
April 1, 2026**

Part I. Executive Summary: Staff Report for Gateway College & Career Academy

School Overview

Charter Organization:	Gateway College and Career Academy (formerly Riverside Gateway to College Early College High School)	Current Grades Served:	9-12
District Boundaries:	Riverside Unified School District	Current Authorized Grades:	9-12
Year Opened:	2013	Current Enrollment:	420
Previous Renewal Year(s):	2018	Term Expiration:	June 30, 2026

I. Background

Gateway College and Career Academy operates a 9-12, countywide benefit charter school within the Riverside Unified School District that includes a single school site located on the Riverside City College campus.

On January 6, 2026, Gateway College & Career Academy (“Gateway”) submitted a material revision (“Material Revision”) and renewal petition (“Renewal Petition”) to the Riverside County Board of Education (“Board”). On April 1, 2026, the County Board will hold a public hearing at which time it will either grant or deny the Material Revision and Renewal Petition. Riverside County Office of Education (“RCOE”) staff and legal counsel have reviewed the Material Revision and Renewal Petition for compliance with the requirements of the Charter Schools Act (the “Act”), Ed. Code §§ 47600, et seq., including any new legal requirements applicable to charter schools since Gateway’s last renewal was granted in 2018. This report contains the analysis and proposed findings of fact related to the Renewal Petition for Board consideration. RCOE staff have prepared a separate report that addresses their analysis and proposed findings of fact regarding the Material Revision. Staff’s analysis of whether Gateway appropriately addressed changes in the law since the last approval of its petition is incorporated into this report.

II. Renewal Options for Board Action

It is recommended that the County Board take action to either grant or deny the proposed renewal petition. The County Board has the following options:

1. Grant the Renewal Petition for a 5-year term, commencing July 1, 2026, and concluding June 30, 2031, provided that the Memorandum of Understanding between the Charter School and RCOE be amended and/or the Petition revised to address findings and recommendations identified in the Staff Report prior to the date of commencement of the new term.
2. Deny the Renewal Petition, adopting the findings identified in the Staff Report, as findings of fact supporting legal reasons for denial.

III. Chartering Authority Responsibility

Outline on Renewal Decision

In the course of its oversight responsibility, the County Board holds the authority to assess whether the findings of fact outlined in the Renewal Staff Report by RCOE substantiate approval or denial, in accordance with the criteria set forth in Education Code Sections 47605, 47607, and 47607.2.

Legal Standards for Review

The following Executive Summary is presented to the County Board to support its decision regarding the approval or denial of the charter renewal petition submitted by Gateway College and Career Academy.

Review and Analysis

RCOE reviewed the Renewal Petition within the framework for authorizers provided by Education Code sections 47605, 47605.6, 47607, and 47607.2. Within its analysis, RCOE primarily assesses schoolwide and student group performance on state and local indicators, with a primary focus on academic metrics (Ed. Code, § 47607.2(b)(1)). The California School Dashboard (“Dashboard”) is used to publish student performance on the designated measures as provided by the school. However, schools may be eligible for Dashboard Alternative School Status (“DASS”) when at least 70% of the student population qualifies as “high-risk student groups.” When determining whether to grant a charter renewal for a DASS-eligible school, RCOE is charged with reviewing the charter school’s performance based on: (1) state and local indicators adopted by the California Department of Education (“CDE”) pursuant to Education Code section 52064.5; and, (2) alternative metrics applicable to the charter school based on the pupil-population served,

and as agreed upon between the charter school and RCOE during the first year of the charter school's term. (Ed. Code § 47607(c)(7)).

As of 2024-25 school year, the CDE has designated Gateway as a DASS school. DASS schools must reapply for DASS status every three (3) years.

IV. Executive Summary of Findings

A. Charter School Performance

The County Board has the authority to deny renewal of the charter petition based on state and local achievement indicators if it determines the closure is in the best interest of the students. (Ed. Code § 47607(c)(7)).

This evaluation incorporates two complementary but distinct standards: (1) snapshot measures of outcomes, including standards met, of state and local indicators, and (2) alternative measures applicable to the charter school based on the pupil population served.

In addition, the County Board may deny a charter renewal petition based on the grounds listed in Education Code section 47605¹. (Ed. Code § 47607(b)). Finally, the County Board may deny renewal of the charter petition, regardless of the school's academic performance, when the charter school is demonstrably unlikely to successfully implement the program set forth in the petition due to substantial fiscal or governance factors. (Ed. Code § 47607(e)).

Findings for School Performance

No findings were determined for measures of academic performance.

¹ While the Education Code section references the code section applicable for district-authorized charter schools, we note that the grounds for denial set forth in Education Code section 47605.6 applicable to countywide charter schools include the same enumerated reasons for denial listed in section 47605, plus an additional reason for "any other basis that the county board of education finds justifies denial of the petition.

B. Not Reasonably Comprehensive

The County Board has the authority to deny renewal of the charter petition if it determines that the petition has not been updated to include new legal requirements since the petition's last adoption.²

Findings for Consideration

The Petition lacks acknowledgment or does not adequately address the following new legal requirements imposed since the Petition's last adoption:

- **AB 2158:** AB 2158 extended mandatory ethics training requirements to governing board members of school districts. As of January 1, 2025, board members must complete mandatory ethics training at least once every two years.
- **AB 640:** AB 640 requires all charter school governing board members in office as of April 1, 2027, to complete school finance training by April 1, 2028. AB 640 went into effect January 1, 2026, but the deadline for compliance is April 1, 2027.
- **SB 857:** SB 857 amended Education code section 49428.2, and requires charter schools serving pupils in grades 7-12 to adopt a policy that addresses referral protocols for pupils exhibiting behavioral health concerns. Policies must be adopted at a regularly scheduled board meeting before January 31, 2026. During the proposed charter term, before July 1, 2029, Gateway must certify that all of its certificated employees and at least 40 percent of its classified employees received youth behavioral health training. Charter School only submitted a "Youth Suicide Prevention" policy, as required by Education Code section 215.
- **SB 848:** SB 848 expands the definition of mandated reporters to include volunteers, contractors, and governing board members. By July 1, 2026, Charter School must provide annual training to all persons who meet the expanded definition of mandated reporter. Neither the Renewal Petition or the submitted policies address the changes in law imposed by SB 848.

Notwithstanding, the Review Team evaluated these deficiencies against all other changes required to be addressed in the Renewal Petition. In totality, the Renewal Petition has been updated consistent with most new legal requirements since the last approval of the charter school petition.

² Education Code Section 47607(b)

C. Significant Fiscal Deficiencies

The County Board has the authority to deny renewal of the charter petition if it determines that, the school is demonstrably unlikely to successfully implement the program set forth in the petition due to fiscal concerns, and all of the following are true:³

- The charter school has been provided with at least 30 days' notice of fiscal violation(s);
- The charter school has been provided with a reasonable opportunity to cure the violation(s);
- The corrective action proposed by the charter school has been unsuccessful; OR
- The violation(s) are sufficiently severe and pervasive as to render a corrective action plan unviable

Findings for Consideration

No findings were determined.

Comments

Gateway received repeat audit findings related to Financial Statements/Internal Controls for fiscal years 2023–24 and 2024–25. The audit reports indicate that the school did not ensure the timely closure of year-end accounting records and did not provide accurate and complete financial information at year-end. Auditors recommended that the school hire additional accounting staff with appropriate qualifications, provide further training to current staff in U.S. GAAP standards and transaction recording, and strengthen internal control procedures over financial reporting, particularly those related to the year-end close process. In each instance, Gateway acknowledged the findings and stated its intention to implement the recommended corrective actions.

³ Education Code Section 47607(e)

D. Governance Mismanagement

The County Board has the authority to deny renewal of the charter petition if it determines that, the school is demonstrably unlikely to successfully implement the program set forth in the petition due to governance concerns, and all of the following are true:⁴

- The charter school has been provided with at least 30 days' notice of governance violation(s);
- The charter school has been provided with a reasonable opportunity to cure the violation(s);
- The corrective action proposed by the charter school has been unsuccessful; OR
- The violation(s) are sufficiently severe and pervasive as to render a corrective action plan unviable

Findings for Consideration

No findings were determined.

E. Enrollment Pattern Concerns

The County Board has the authority to deny renewal of the charter petition if it determines that the school is not serving all students who wish to attend⁵ and all of the following are true:

- The charter school has been provided with at least 30-day notice of enrollment violations; AND
- The charter school has been provided with a reasonable opportunity to cure the violation(s); AND
- The corrective action proposed by the charter school has been unsuccessful; OR
- The violation(s) are sufficiently severe and pervasive as to render a corrective action plan unviable

Findings for Consideration

No findings were determined.

⁴ Education Code Section 47607(e)

⁵ Education Code Section 47607(d)(3)

END OF PART ONE

Refer to page 1 Renewal Options for Board Action

Part II. DETAILED ANALYSIS: Staff Report for Gateway College & Career Academy

I. Legal Review Parameters

A. Renewal Considerations

California Assembly Bill 1505 modified the framework for charter school renewals. To renew a petition, the chartering authority must assess whether the charter school meets the criteria outlined in Education Code Sections 47605, 47607, and 47607.2. In making its determination, the following factors shall be considered:

- School performance
- New petition requirements
- Ongoing fiscal issues
- Governance concerns
- Pupil enrollment patterns

Renewal petitions must include a reasonably comprehensive description of any new requirements for charter schools enacted into law after the charter was originally granted or last renewed. (Ed. Code, § 47607(b)).

B. Renewal Evaluation Categories

As an additional criterion, Education Code section 47607, subdivision (c), requires an authorizer to consider the charter school’s placement under performance categories based on the charter school’s performance on the California School Dashboard (“Dashboard”).⁶ The California Department of Education (“CDE”) designates charter schools as “low-performing,” “middle-performing,” or “high-performing.”

Renewal Performance Tiers			Non-Tier
HIGH	MIDDLE	LOW	DASS
Presumptive Renewal Performance Evaluation <u>Not</u> Required for Approval	Performance Evaluation Required for Approval	Presumptive Denial Performance Evaluation Required for Approval	Performance Evaluation Required for Approval

⁶ See California Department of Education, California School Dashboard, available at <https://www.caschooldashboard.org/about/accountability>.

For traditional charter schools, school performance determinations are based on the two most recent, consecutive years of Dashboard data. For reference, there are five performance colors on the Dashboard: blue, green, yellow, orange, and red. Blue represents the highest performance and red represents lowest performance.

Schools qualifying for DASS are held to a distinct renewal evaluation standard. CDE has designated Gateway as qualifying for DASS pursuant to Education Code section 52052, subdivision (b). For DASS schools specifically, the chartering authority must review: (1) state and local indicators adopted by CDE pursuant to Education Code section 52064.5; and (2) “alternative metrics” applicable to the charter school based on the pupil population served, to be mutually agreed upon by the charter school and the charter authorizer.

The CDE has adopted the following state indicators that must be reviewed:

- English language arts/literacy (ELA)
- Mathematics
- Chronic Absenteeism Indicator
- English Learner Progress Indicator (ELPI)
- Graduation Rate Indicator
- College/Career Indicator (CCI)
- Suspension Rate Indicator

Of those, CDE designates academic indicators as ELA, Mathematics, ELPI, and CCI.

Additionally, CDE has adopted the following local indicators applicable to all local educational agencies (“LEAs”), which were founded on the Local Control Funding Formula (“LCFF”) priorities:

- Basics: Teachers, Instructional Materials, Facilities
- Implementation of State Academic Standards
- Parent and Family Engagement
- School Climate
- Access to Broad Course of Study

The Review Team analyzes charter school’s Dashboard comprehensively to include the charter’s term. Analyzing trends facilitates a more accurate assessment of the charter school’s ability to respond to outcomes and pursue and achieve long-term improvement. For DASS schools, a chartering authority **must** consider, in addition to schoolwide performance data and performance of all subgroups on state and local indicators in its renewal petition review process, the charter school’s performance on alternative metrics applicable to the charter school based on the pupil population served. As more thoroughly described in Part II “School Review”, RCOE and Gateway have agreed to alternative metrics for ELA, Mathematics, ELD, College/Career Readiness, Attendance, and High School Completion.

C. Denial Standards

Pursuant to Education Code section 47607(c)(7), a chartering authority **may deny** the renewal of a DASS charter school only upon making written findings, setting forth specific facts to support the finding that closure of the charter school is in the best interest of pupils.

In addition, pursuant to Education Code 47607(e), irrespective of the performance criteria, a chartering authority **may deny** renewal of a charter school if:

- The charter school is demonstrably unlikely to successfully implement the program set forth in the petition due to substantial fiscal or governance factors; or
- The charter school is not serving the pupils who wish to attend, as documented by aggregate data reflecting pupil enrollment patterns at the charter school.

The Review Team's detailed evaluation follows.

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II. School Review

A. Performance Review

1. Performance Review: DASS

Review Standards ⁷	
Dashboard Performance	<ul style="list-style-type: none">• Schoolwide performance on the state indicators• Student group performance on the state indicators• Dashboard reporting on the local indicators
Alternative Metrics	<ul style="list-style-type: none">• Performance on alternative metrics applicable to the charter school based on the pupil population served

2. Performance Review: Scope and Scale

The Review Team conducted their analysis using a phased protocol derived from Education Code to ensure findings were thorough and designed with statutory requirements.

⁷ Education Code Sections 47607(c), 47607.2(b)

DASS CHARTER SCHOOL PERFORMANCE REVIEW		
Dashboard-Alternative School Status (DASS) California Education Code §§ 47607, 47607(b), 47607(c)(7), 47607(d)(1), 52064.5(d)		
Protocol	Subsection	Description
Pathway Gate — Confirm DASS Status Before Proceeding		
Step 0	0.1 Confirm DASS Status	Verify that this school appears on the current CDE DASS list. Document the source used.
Build the Data Record		
Step 1	1.1 Pull Dashboard Data	Retrieve Dashboard results for the last 3 to 5 years. Identify priority indicators and document any data that is missing or not available.
	1.2 Review Each Indicator	For each priority indicator, assess whether the data is usable and whether a trend can be established. Document the reason if either is not possible.
	1.3 Note on HS Testing	Document the school's high school testing structure and specify how those results will be used in this review.
	1.4 Verified Data Submission (VDS)	Verify whether the school has submitted its most recent Verified Data Submission. If submitted, confirm it has been reviewed and document any differences from Dashboard results.
Record Findings and Draft Determinations		
Step 2	2.1 Dashboard Findings	For each priority indicator, summarize what the data shows and issue a determination. Use comparable years only.
	2.2 Alternative Metrics	For each agreed alternative metric, document the results relative to the target. Confirm that the source can be independently verified.
	2.3 Do the Results Agree?	Review the Dashboard findings and alternative metric findings together. Assess whether they point in the same direction. Document a one-sentence explanation of what the alignment or divergence means for the recommendation.
Synthesize Evidence		
Step 3	3.1 Write the Evidence Summary	Prepare a narrative that synthesizes the Dashboard and alternative metric findings. Identify key strengths, areas of concern, and the limits of the available evidence.
	3.2 Evaluate the Summary	Consider comprehensive data record and express in narrative format. If conditions apply, draft them in full here.

Figure 1: DASS Performance Review Protocol

3. Performance Review: Gateway

Consideration of the California Dashboard

(All Students; Student Groups)

Consistent with EC 47607(c)(1), current Dashboard Status results were reviewed relative to the performance standards prescribed for a non-DASS school. To be considered meeting state performance standards, a school needs to achieve either of the following: (1) the school receives a blue or green indicator, or (2) the school has a DFS ≥ 0 (Math/ELA only). Where the school meets standard, no further analysis is necessary. Alternatively, indicators identified as not meeting standard receive secondary analysis via the school's established metrics as agreed upon with the chartering authority.

English Language Arts

The English Language Arts Indicator measures how well students are meeting grade-level standards. It calculates the average Distance from Standard (DFS) of student scores based on Smarter Balanced Summative Assessments or California Alternative Assessments for the school as well as change from the prior year. Gateway received either “Very Low” or an orange performance level for the All Student group in each year its data was reported. The school only has two years of data available for other student groups.

English Language Arts					
Student Group:	2019	2022	2023	2024	2025
All		VERY LOW	VERY LOW		
Hispanic					
Socioeconomically Disadvantaged					

Figure 2: ELA Performance on the Dashboard

Determination: Gateway has not met the performance standards prescribed for a non-DASS school in English Language Arts. **Secondary analysis via the school’s established alternative metrics is required.**

[remainder intentionally left blank]

Mathematics

The Mathematics Indicator uses the same DFS methodology described above, measuring grade-level proficiency on the Smarter Balanced Summative Assessments or California Alternative Assessments. Gateway received either “Very Low” or an orange performance level for the All-Student group in each year its data was reported. The school only has two years of data available for other student groups.

Mathematics					
Student Group:	2019	2022	2023	2024	2025
All		VERY LOW	VERY LOW		
Hispanic					
Socioeconomically Disadvantaged					

Figure 3: Mathematics Performance on the Dashboard

Determination: Gateway has not met the performance standards prescribed for a non-DASS school in Mathematics. **Secondary analysis via the school’s established alternative metrics is required.**

[remainder intentionally left blank]

English Language Progress Indicator

The English Learner Progress Indicator (ELPI) measures the proportion of English learners making annual progress toward English language proficiency. Consistent with Education Code section 47607(c)(1), staff reviewed California School Dashboard ELPI results to assess the school’s performance over the term of the charter. As reflected in Figure 4, Gateway received either “Low” or a yellow performance level for the All-English Learner group in each year its data was reported. The school only has two years of data available for this indicator.

English Learner Progress					
Student Group:	2019	2022	2023	2024	2025
All	LOW				
Long-Term English Learners					

Figure 4: ELPI Performance on the CA Dashboard

Determination: Gateway has not met the performance standards prescribed for a non-DASS school in English Language Performance for the limited years available. **Secondary analysis via the school’s established alternative metrics is required.**

[remainder intentionally left blank]

College and Career Indicator

The College/Career Indicator (CCI) evaluates the extent to which high school students graduate prepared for postsecondary education or meaningful career pathways. In alignment with EC 47607(c)(1), staff reviewed the school’s CCI results to assess whether students met state-defined preparedness benchmarks. The school’s CCI outcomes demonstrate “Very Low,” as well as a yellow and green performance indicator over its three recent years of performance data for the All-Students group and other student groups.

College/Career					
Student Group:	2019	2022	2023	2024	2025
All			VERY LOW		
English Learners					
Hispanic			VERY LOW		
Socioeconomically Disadvantaged			VERY LOW		

Figure 5: CCI Performance on the CA Dashboard

Determination: Gateway has not met the performance standards prescribed for a non-DASS school for College and Career Performance for any student groups in the years available. **Secondary analysis via the school’s established alternative metrics is required.**

[remainder intentionally left blank]

Graduation Rate

The Graduation Rate indicator measures the proportion of students who successfully complete high school within four years. Staff reviewed multi-year graduation outcomes, pursuant to EC 47607(c)(1), to evaluate both current performance and progress over time. The school’s graduation rate has shown “Very Low” or a red performance indicator in every year for every applicable student group.

Graduation Rate					
Student Group:	2019	2022	2023	2024	2025
All		VERY LOW			
English Learners					
Hispanic		VERY LOW			
Homeless					
Long-Term English Learners					
Socioeconomically Disadvantaged		VERY LOW			

Figure 6: Graduation Rate Performance on the CA Dashboard

Determination: Gateway has not met the performance standards prescribed for a non-DASS school in Graduation Rate Performance in any year. **Secondary analysis via the school’s established alternative metrics is required.**

Suspension Rate Indicator

The Suspension Rate indicator reflects the percentage of students receiving one or more suspensions during the academic year. Consistent with Education Code sections 47607(c)(1) and 47607(c)(3), staff reviewed California School Dashboard Suspension Rate results to assess performance over the term of the charter. As reflected in Figure 7, Gateway’s Suspension Rate results show the school meeting performance standards across the majority of years and student groups, with the exception of the most recent Dashboard.

Suspension Rate					
Student Group:	2019	2022	2023	2024	2025
All		VERY LOW			
African American					
English Learners					
Hispanic		VERY LOW			
Long-Term English Learners					
Socioeconomically Disadvantaged		VERY LOW			
Students with Disabilities					
White					

Figure 7: Suspension Rate Performance on the CA Dashboard

Determination: Gateway has met the performance standards prescribed for a non-DASS school for Suspension Rate Performance for all student groups, **therefore secondary analysis via the school’s established alternative metrics is not required.**

Consideration of Alternative Metrics

Consistent with Education Code section 47607(c)(7), the charter school's performance on alternative metrics applicable to its pupil population was reviewed. These alternative measures align with Dashboard indicators and were developed in partnership with the school to better reflect its student population. Where performance meets the standards prescribed for a non-DASS school, no further review is warranted. Indicators that do not meet standard are subject to secondary analysis using the school's locally developed measures.

Alternative Metrics									
Dashboard Connection	Measure	Goal	2021	2022	2023	2024	2025	Target	
Enrollment			92	70	128	335	394		
Cumulative Enrollment			129	155	325	469	530		
Academic Achievement	ELA	NWEA MAP Growth Percentile	Average student Conditional Growth Percentile will be at least 40th percentile.	N/A	33.3 n=3	35.6 n=41	41.3 n=159	53.0 n=326	40.0
	Mathematics	NWEA MAP Growth Percentile	Average student Conditional Growth Percentile will be at least 40th percentile.	N/A	45.7 n=3	43.9 n=38	53.3 n=171	52.0 n=333	60.0
	English Language Development	ELPAC Participation Rate	95% of eligible students will participate.	64.3% n=4	68.8% n=7	100% n=37	98.4% n=62	95% n=68	95%
		English Language Development Rate	Eligible students will demonstrate growth on the ELPAC assessment.	N/A	N/A	83.8%	91.9%	70.2%	80%
		Reclassification Rate		N/A	N/A	4.0%	14.5%	17.0%	20%
	College/Career Readiness	College Credit Attainment	On average, graduates will earn a minimum of 12 college credits upon graduation.	11.2	16.08	7.8	7.0	5.7	12
CCI Rate		At least 60% of students will be classified as Approaching Prepared or Prepared on the CCI, adjusted to include a 1-Year Grad Rate	N/A	N/A	N/A	65.6%	53.8%	60%	
Academic Engagement	Attendance	Average Daily Attendance	Overall ADA will be at least 90%.	99.0%	98.8%	99.8%	97.3%	81.8%	90%
	High School Completion	Course Success Rate	75% of students will pass all courses with at least a "C."	N/A	65.54%	68.4%	55.0%	87.0%	75%
		One-Year Graduation Rate	At least 80% grad rate within the one-year cohort.	68.9%	72.3%	72.3%	79.0%	77.0%	80%

Figure 8: Alternative Metrics Performance

Academic Achievement

The school's identified measure for this domain is the NWEA MAP Growth Percentile. ELA results indicate relatively consistent growth toward target across the review period. Mathematics average percentiles reflect more modest outcomes. ELD measures, as reflected by participation rate and student growth on the ELPAC, indicate school progress despite targets not being met across all years. In the College and Career Readiness domain, the school has met its established targets in one of the measured years.

Academic Engagement

This domain includes measures of average daily attendance, course success rate, and one-year graduation rate. Attendance targets have been met in most years of the review period. The course success rate and one-year graduation rate have each been met in one of the measured years.

Analysis

The data reflects a school that experienced substantial operational shifts during the review period, including enrollment growth from 92 to 394 students, an increase of approximately 328%, alongside a shift in instructional modality. The scale of these changes makes it difficult to confirm academic growth and progress with certainty, as their relative contribution to individual indicator results cannot be determined from the available information. Across multiple measures, the absence of regression during a period of significant operational transition may itself represent a meaningful indicator of the school's capacity to sustain student outcomes. The primary challenge to drawing firm conclusions lies in the limitations of available data rather than the school's performance itself. Additional data over time will be needed to more fully assess the school's academic trajectory given the scope of its enrollment growth and instructional transition

Recommendations

The chartering authority recommends that the school revisit its alternative metrics in partnership with the chartering authority to assess their continued alignment with the school's current program model and student population. Given the significant operational changes that occurred during the review period, it is likely that the measures would benefit from refinement, the addition of complementary indicators, or recalibration of targets to more precisely reflect the school's current context and support and its diverse modalities.

B. Legal Updates to the Charter Petition

Review Standards	
New Legal Requirements	The petition has been updated to include reasonably comprehensive descriptions for any new legal requirements imposed since its last update.
Reasonably Comprehensive	Descriptions for new legal requirements must: <ul style="list-style-type: none">● Be substantive, not a list● Address all aspects of each element● Be specific to this charter

Figure 9: Petition Document Review Standards

Denial Standard

The petition does not contain a reasonably comprehensive description of the new requirement(s) imposed since its last update.

Determinations for Consideration

Element 5: Governance Structure

AB 2158 extended mandatory ethics training requirements to governing board members of school districts. As of January 1, 2025, board members must complete mandatory ethics training at least once every two years. The Renewal Petition addresses professional training for charter school employees, primarily in the Student & Parent Handbook and School Safety Plan, but does not address professional development or required training for its governing body. Furthermore, the Renewal Petition does not recognize the school finance training required by AB 640, which went into effect January 1, 2026. AB 640 requires all charter school governing board members in office as of April 1, 2027, to complete school finance training by April 1, 2028.

Training surrounding ethics and fiscal responsibility is an important aspect of a charter school's overall governance structure. Therefore, a reasonable comprehensive description of the governance structure should include recognition of these important trainings.

Element 7: Health and Safety Procedures

SB 857, amending Education code section 49428.2, requires charter schools serving pupils in grades 7-12 to adopt a policy that addresses referral protocols for pupils exhibiting behavior health concerns. Policies must be adopted at a regularly scheduled board meeting before January 31, 2026. At a minimum the policy must address the needs of high-risk groups identified by statute, and address any training to be provided to teachers. During the proposed charter term, before July 1, 2029, Gateway must certify that all of its certificated employees and at least 40 percent of its classified employees have received youth behavioral health training. Related to behavioral health, Gateway includes with their petition a copy of their Board Policy Number 212, "Youth Suicide Prevention", as required by Education Code section 215. Although there are overlapping requirements for policies related to suicide prevention and behavioral health, the charter school's current policy requires further tailoring to address referral protocols for pupils experiencing "youth behavioral health disorders". Youth behavioral health disorders, as defined, mean mental health and substance abuse disorders.

The Renewal Petition acknowledges all employees are "mandated reporters" (Petition, p. 57.) SB 848 expands the definition of mandated reporters to include volunteers, contractors, and governing board members. By July 1, 2026, Charter School must provide annual training to all persons who meet the expanded definition of mandated reporter. Neither the Renewal Petition or the submitted policies address the changes in law imposed by SB 848.

Notwithstanding, the Review Team evaluated these deficiencies against all other changes required to be addressed in the Renewal Petition. In totality, the Renewal Petition has been updated and is consistent with most new legal requirements since the last approval of the charter school petition.

C. Fiscal Review

Monitoring a charter school's fiscal viability is a fundamental component of the chartering authority's ongoing oversight responsibilities. Fiscal concerns are typically identified and addressed throughout the charter term. While the renewal process does not impose a separate or heightened review of fiscal factors, the chartering authority may consider such concerns if they are persistent or indicate systemic financial instability.

Denial Standard

Review Standards	
Fiscal Management	<ul style="list-style-type: none"> ● Adheres to generally accepted accounting principles (GAAP) ● Maintains a balanced budget ● Submits all legally required reports accurately and on time ● Completes audits timely with clean findings ● Implements approved internal fiscal control policies and procedures ● Discloses related LLCs, 501(c)(3) organizations, and charter management organizations (CMOs) ● Transparently reports current debt and lease agreements
Fiscal Viability	<ul style="list-style-type: none"> ● Maintains MOU-required reserves ● Positive multi-year financial projection ● Positive cash flow ● Appropriate days of Cash on Hand ● Sustainable enrollment ● Efficient spending ● Effective debt management
Due Process	<p>Ensure the school has been provided due process to include the following:</p> <ul style="list-style-type: none"> ● At least 30 days' notice of the alleged violation ● Reasonable opportunity to cure the violation, including a corrective action plan proposed by the charter school

Figure 10: Fiscal Oversight Review Standards

The school is unlikely to successfully implement the program set forth in the petition due to substantial fiscal factors, with either of the following findings:

- The charter school has been provided with at least 30 days' notice of fiscal violation(s);
- The charter school has been provided with a reasonable opportunity to cure the violation(s);
- The corrective action proposed by the charter school has been unsuccessful; OR
- The violation(s) are sufficiently severe and pervasive as to render a corrective action plan unviable

Determinations for Consideration

No findings were determined.

Recommendation

Gateway received repeat audit findings related to Financial Statements/Internal Controls for fiscal years 2023–24 and 2024–25. The audit reports indicate that the school did not ensure the timely closure of year-end accounting records and did not provide accurate and complete financial information at year-end. Auditors recommended that the school hire additional accounting staff with appropriate qualifications, provide further training to current staff in U.S. GAAP standards and transaction recording, and strengthen internal control procedures over financial reporting, particularly those related to the year-end close process. In each instance, Gateway acknowledged the findings and stated its intention to implement the recommended corrective actions.

D. Governance Review

Monitoring the viability of a charter school's governance is a fundamental component of the chartering authority's ongoing oversight responsibilities. Governance concerns are typically identified and addressed throughout the charter term. While the renewal process does not impose a separate or heightened review of governance factors, the chartering authority may consider such concerns if they are persistent or indicate systemic instability in governance.

Review Standards

Compliance with Legal and Charter Requirements

- Consistently complies with all state and federal laws, charter petition, and bylaws
- Adheres to the Brown Act, Political Reform Act, Public Records Act, LCAP, and Nonprofit Corporation Code requirements
- Ensures all staff are properly vetted, qualified, and credentialed
- Maintains safe, permitted, and insured facilities
- Keeps all health and safety policies and procedures up to date

Board Oversight and Effectiveness

- The County Board has the capacity to fulfill its responsibilities effectively
- Maintains independence and avoids conflicts of interest
- Actively participates in meetings, coming prepared and engaged
- Oversees resources and budgets responsibly
- Addresses audit findings and implements corrective actions
- Ensures stable and effective school leadership

	<ul style="list-style-type: none"> Engages educational partners in decision-making processes Meets or actively works toward the student outcomes outlined in the charter
Due Process	<p>Ensure the school has been provided due process to include the following:</p> <ul style="list-style-type: none"> At least 30 days' notice of the alleged violation Reasonable opportunity to cure the violation, including a corrective action plan proposed by the charter school

Figure 11: Governance Oversight Review Standards

Denial Standards

The school is unlikely to successfully implement the program set forth in the petition due to substantial governance factors, with either of the following findings:

- The charter school has been provided with at least 30 days' notice of fiscal violation(s);
- The charter school has been provided with a reasonable opportunity to cure the violation(s);
- The corrective action proposed by the charter school has been unsuccessful; OR
- The violation(s) are sufficiently severe and pervasive as to render a corrective action plan unviable

Determinations for Consideration

No findings were determined.

E. Enrollment Review

As part of its ongoing oversight responsibilities, the chartering authority regularly monitors student enrollment trends and reviews complaints. When evaluating a charter renewal petition, the authorizer is required to consider whether the charter school is serving all students who wish to attend.

Denial Standards

- Finding(s) of fact for denial if the charter school is not serving all pupils who wish to attend
- Evidence to support any finding of fact under this part will be included in the report

Review Standards	
Substantiated Complaints	Consider any substantiated complaints of non-compliance pertaining to any of the following: <ul style="list-style-type: none"> ● Suspension ● Expulsion ● Involuntary Removal
Enrollment Pattern Data	Consider any enrollment data provided by the CDE in response to an authorizer request for information (Optional, authorizer discretion)
Due Process	Ensure the school has been provided due process to include the following: <ul style="list-style-type: none"> ● At least 30 days' notice of the alleged violation ● Reasonable opportunity to cure the violation, including a corrective action plan proposed by the charter school

Figure 12: Student Enrollment Oversight Review Standards

Determinations for Consideration
No findings were determined.

END OF DOCUMENT

Refer to page 1 Renewal Options for Board Action