



**Renewal Petition Staff Report
Garvey/Allen STEAM Academy
June 9, 2026**

Part I. Executive Summary: Staff Report for Garvey/Allen STEAM Academy

School Overview			
Charter Organization:	Garvey/Allen Visual and Performing Arts Academy for Science, Technology, Engineering and Mathematics, Inc.	Current Grades Served:	K-8
District Boundary	Moreno Valley Unified School District	Current Authorized Grades:	K-8
Year Opened:	2018	Current Enrollment:	210
Previous Renewal Year(s):	N/A	Term Expiration:	June 30, 2026

I. Background

Garvey/Allen STEAM Academy is a K-8, classroom-based charter school in Moreno Valley that operates at a single school site.

On April 1, 2026, Garvey/Allen STEAM Academy (“Garvey/Allen” or “Charter School”) submitted a renewal petition (“Renewal Petition”) to the Riverside County Board of Education (“County Board”). On June 24, 2026, the County Board will hold a public hearing at which time it will either grant or deny the Renewal Petition. Riverside County Office of Education (“RCOE”) staff and legal counsel have reviewed the 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 Garvey/Allen’s original petition was granted in 2018. This report contains the analysis and proposed findings of fact related to the Renewal Petition for County Board consideration, including Staff’s analysis of whether Garvey/Allen appropriately addressed any changes in the law since its last petition approval.

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 Garvey/Allen.

Review and Analysis

RCOE applied a standardized and evidence-based methodology to evaluate the school's eligibility for charter renewal, consistent with the requirements of EC 47607(c)(1), 47607(c)(3), and 47607.2(b)(1)–(2). State law directs authorizers to determine whether a school and all pupil subgroups currently exceeds, meets, or is lower than state performance standards. For a charter school meeting state standards, Academic indicators, specifically English Language Arts and mathematics, must be afforded greater weight in this analysis. RCOE, therefore, based all determinations on verified performance data from the California School Dashboard, other publicly available data files, and multi-year student group results. Context was reviewed to support interpretation, not substituting for performance evidence.

IV. Executive Summary of Findings

A. Charter School Performance

The County Board has the authority to deny renewal of the charter petition if it determines that all of the following are true:

- The school has failed to meet or make sufficient progress toward standards; AND
- Closure is in the best interest of students; AND
- This determination requires greater weight to be provided to performance on measurements of academic performance¹.

This evaluation incorporates two complementary but distinct standards: (1) snapshot measures of outcomes, including standards met, or state and local indicators and (2) longitudinal analysis that tracks the same students across grade spans.

In addition, the County Board may deny a charter renewal petition based on the grounds listed in Education Code section 47605. (Ed. Code § 47607(b).) Finally, the 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 determined

Findings for Other Academic Indicators

Garvey/Allen has not demonstrated meeting standards for Chronic Absenteeism in most years for the All Students group and the African American student group. Hispanic and Socioeconomically Disadvantaged student groups have not met standard in any year, based on publicly available data on the California School Dashboard.

The Chronic Absenteeism indicator measures the percentage of students who are absent for 10 percent or more of instructional days. Consistent with Education Code section 47607(c)(1), staff reviewed multi-year absenteeism trends to assess current

¹ Education Code Section 47607.2(b)(2)

performance and progress over time. The school’s Chronic Absenteeism results are historically high and have not met state performance standards across multiple years. Although the school demonstrated an overall positive trend on the 2024 Dashboard, absenteeism further increased in 2025 across all student groups. These results indicate that attendance continues to be an area in need of focused improvement, particularly given its direct relationship to student access, instructional time, and overall academic progress. The indicator, therefore, informs both the standards determination and the school’s broader conditions for supporting student engagement.

Comments (Academic Performance)

No findings determined.

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 Renewal Petition incorporates most mandatory legal updates enacted since its last renewal, but could benefit from a more comprehensive description and/or technical updates should be addressed in the following elements:

- **Element 3. Measure of Pupil Progress:** The Renewal Petition states that it will comply with all mandated state assessment requirements required by Education Code section 60605. (Petition, p. 149.) Additionally, Tier 1 of the Charter School’s MTSS framework uses “universal screening measures” to assess students. (Petition, p. 105.) However, the Petition lacks acknowledgment of the mandatory reading difficulties screener for students in grades K-2. SB 153, effective June 29, 2024, required Garvey/Allen to adopt as of June 30, 2025, one or more screening assessments.
- **Element 4. Governance:** The Renewal Petition acknowledges that the Board will receive training to “ensure they have the proper tools and knowledge to govern a charter school.” Areas of training referenced include the Brown Act, Political Reform Act and ethics. A more reasonably comprehensive description would also

² Education Code Section 47607(b)

include reference to the mandatory school finance training required by AB 640, which was enacted on January 1, 2026.

- **Element 6. Health and Safety Procedures.**
 - **Mandated Reporter Training.** Page 183 of the Renewal Petition recognizes that all employees are considered mandated reporters and must receive training annually. SB 848, effective July 1, 2026, expands upon whom the charter school must provide mandated reporter training to, and now includes “volunteers, and persons working on their behalf.”
 - **Inclusion of all elements referenced in the school safety plan.** Page 186 of the Renewal Petition identifies that its School Safety Plan must include elements A-N of Education Code section 32282(a)(2). As a school serving students in grades 7 and 8, Garvey/Allen’s safety plan must also include element “O”. Charter School did not provide a copy of its School Safety Plan with the petition.
 - **Behavioral Health Referrals.** SB 857 requires charter schools serving pupils grades 7-12 to adopt a policy establishing referral protocols for behavioral health by January 31, 2026. The Renewal Petition, while containing references to mental health resources, does not explicitly address this requirement.
 - **Student ID Requirements.** Charter School serves students in grades 7 and 8. To the extent Charter School issues school ID cards, the back of the ID cards must include a number for the 988 Suicide and Crisis Lifeline, the National Domestic Violence Hotline and a phone number for The Trevor Project’s LGBTQ suicide hotline.

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

³ Education Code Section 47607(e)

No findings were determined.

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 days' 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 Garvey/Allen STEAM 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

Figure 1: Renewal Tier Performance Categories

⁶ See <https://www.caschooldashboard.org/about/accountability>.

School performance determinations are based on the two most recent, consecutive years of Dashboard data.

The following two criteria are used to determine the performance category (i.e. High, Middle or Low) of a charter school:

1. **Criterion 1:** Based on the performance colors received for all of the state indicators on the Dashboard for the two previous Dashboard years. The Dashboard state indicators are:
 - English language arts/literacy (ELA)
 - Mathematics
 - Chronic Absenteeism Indicator
 - English Learner Progress Indicator (ELPI)
 - Graduation Rate Indicator
 - College/Career Indicator (CCI)
 - Suspension Rate Indicator

2. **Criterion 2:** Based on the “Status” (also known as current year data) for all academic indicators with a performance color for the two previous Dashboard years. Education Code section 47607, subdivision (c)(3) defines academic indicators as:
 - ELA
 - Mathematics
 - ELPI
 - CCI

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: CDE has designated Garvey/Allen as “middle-performing” charter school pursuant to Education Code section 47607.2, subdivision (b).

For middle-performing schools, a chartering authority **must** consider schoolwide performance data and performance of all subgroups on state and local indicators in its renewal petition review process. Greater weight must be provided to “performance on measurements of academic performance in determining whether to grant a charter renewal.”⁷:

C. Denial Standards

Pursuant to Education Code section 47607.2(b)(3), a chartering authority **may deny** the renewal of a middle-performing charter school only upon making written findings, setting forth specific facts to support the finding, that:

⁷ Ed. Code § 47607.2(b)(2).

- The charter school has failed to meet or make sufficient progress toward meeting standards that provide a benefit to the pupils of the school; and
- Closure of the charter school is in the best interest of pupils; and
- The decision not to renew gives “greater weight” to the charter school’s performance on measurements of academic performance.

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.

CDE has designated Garvey/Allen as a “middle-performing” charter school pursuant to Education Code section 47607.2. RCOE has confirmed Garvey/Allen qualifies for a Middle-Tier Performance Review based on its performance on the 2024 and 2025 California School Dashboard. The Review Team’s detailed evaluation follows.

[remainder intentionally left blank]

II. School Review

A. Performance Review

1. Performance Review: Middle Tier

Review Standards ⁸	
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● Greater weight shall be provided to measures of academic performance: ELA, Math, and English Learner Progress
Verified Data ⁹	<ul style="list-style-type: none">● Measurable increases in academic achievement demonstrated by a year's progress for each year in school; or● Strong postsecondary outcomes defined by college enrollment, persistence, and completion rates equal to similar peers

Figure 2: Middle-Tier Performance Review Standards

2. Performance Review: Scope and Scale

The Review Team analysis is grounded in a phased protocol derived from Education Code to ensure findings were thorough and designed with statutory requirements.

⁸ Education Code Sections 47607(c), 47607.2(b)

⁹ RCOE will continue to accept and consider the Charter School's use of verified data following the sunset of the applicable Education Code provision as additional information related to Charter School's performance, provided that the submission adheres to state-recommended data use procedures.

Figure 3: Middle-Tier Performance Evaluation Protocol

Protocol Step	Subsection	Description	Ed Code Grounding
Step 1 – Data Record	1.1 Data Collection	Collect Dashboard indicators (ELA/Math DFS, ELPI, Chronic Absenteeism, Suspension, Grad Rate, CCI) over 3–5 years.	47607(c)(1) – pupil outcomes
	1.2 Participation Verification	Document participation rates, LOSS penalties, continuous enrollment factors.	47607(c)(1)
	1.3 Subgroup Data Protocol	Extract multi-year subgroup performance and identify disparities.	47607(c)(3) – subgroup outcomes
Step 2 – Standard Met	2.1 Status Determination	Determine if each indicator meets state standard (Yes/No) based on most recent Status.	47607(c)(1); 47607.2(b)(1)
	2.2 Validation	Cross-check Status with Additional Reports and Five-by-Five tables.	47607.2(b)(1)
Step 3 – Longitudinal Trajectory	3.1 Trajectory Classification	Classify multi-year pattern as Sustained High, Rising, Static, Inconsistent, Persistent Low.	47607(c)(1) – analysis of multi-year trends
	3.2 Pattern Detection	Review 3–5 years for directional patterns including cohort changes, penalties, volatility.	47607.2(b)(1)–(2)
	3.3 Subgroup Trajectory	Apply same trajectory classification to subgroups and identify persistent gaps.	47607(c)(3)
Step 4 – Local Evidence	4.1 Local Measures	Analyze multi-year patterns in NWEA, i-Ready, common assessments, course completion.	47607.2(b)(2) – use of local indicators
	4.2 Consistency Check	Verify alignment between local and state measures; document discrepancies.	47607.2(b)(2)
	4.3 Validation	Ensure reliability of local data; require explanations where necessary.	47607(c)(1)
Step 5 – Renewal Determination	5.1 Standards Compliance	Identify how many indicators met state standard; document persistent failures.	47607(c)(1)
	5.2 Trajectory Synthesis	Evaluate overall multi-year trajectory across all indicators.	47607.2(b)(1)–(2)
	5.3 Contextual Analysis	Consider contextual factors (program shifts, leadership, SPED systems, enrollment).	47607(c)(1)
	5.4 Final Determination	Synthesize all evidence into a clear renewal determination.	47607(c)(1); 47607.2(b)(1)–(2)
	5.5 Documentation & Transparency	Publish the finalized one-pager; include in board docs; archive.	47607.2(b)(2)

3. Performance Review: Garvey/Allen

Consideration of the California Dashboard (*All Students; Student Groups*)

Consistent with EC 47607(c)(1), the current Dashboard Status results were reviewed to determine whether the school meets state performance standards. For a school to be considered meeting state performance standards, it needs to achieve either of the following: (1) the school receives a blue or green indicator, or (2) the school has a DFS ≥ 0 . Neither the School’s ELA nor mathematics meets the standard for schoolwide performance for the All Students group or other student groups. Because the school does not meet standards in the core academic indicators, it does not satisfy the “meeting standards” condition. This determination is based on the current Dashboard Status, independent of trajectory/growth.

Figure 4: ELA/Math Standards Met/Not Met

	Student Groups	Dashboard Color	DFS	Total	Percent	Meets Standards
English Language Arts	All	0/4	0/4	0/4	0%	Not Met
	Socioeconomically Disadvantaged	0/4	0/4	0/4	0%	Not Met
	African American	0/4	0/4	0/4	0%	Not Met
	Hispanic	1/1	1/1	1/1		NA
Mathematics	All	0/4	0/4	0/4	0%	Not Met
	Socioeconomically Disadvantaged	0/4	0/4	0/4	0%	Not Met
	African American	0/4	0/4	0/4	0%	Not Met
	Hispanic	1/1	1/1	1/1		NA

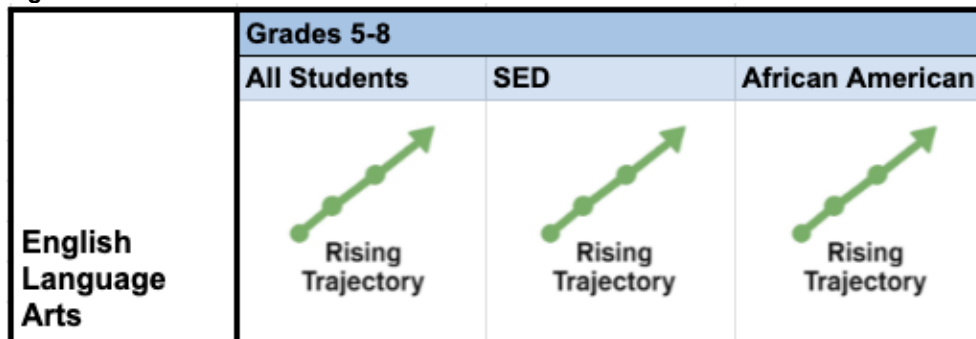
Analysis of Progress Toward Meeting Academic Standards

Pursuant to EC 47607.2(b)(1)–(2), multi-year trajectories were examined to assess whether the school has made progress toward meeting academic standards in English Language Arts and Mathematics. The analyses considered multiple cohorts of students who have progressed through grade spans 5-8, otherwise known as a quasi-longitudinal view. This is in contrast to the cross-sectional view of meeting standards as presented in the previous section.

English Language Arts

In English Language Arts, while the school has not yet met the state proficiency standard, the school demonstrates a consistent upward trajectory of growth across years for All Students and all student subgroups. This trend provides evidence that the school is on an established course of academic growth in this content area. It should be noted that year-over-year changes in enrollment and grade-level configuration may introduce some variability in cohort-level results; however, this contextual factor does not alter the fundamental finding. The record is limited to verified state data, as no supplemental data was submitted by the school within the parameters of CDE data use protocols.

Figure 5: ELA Performance on CAASPP

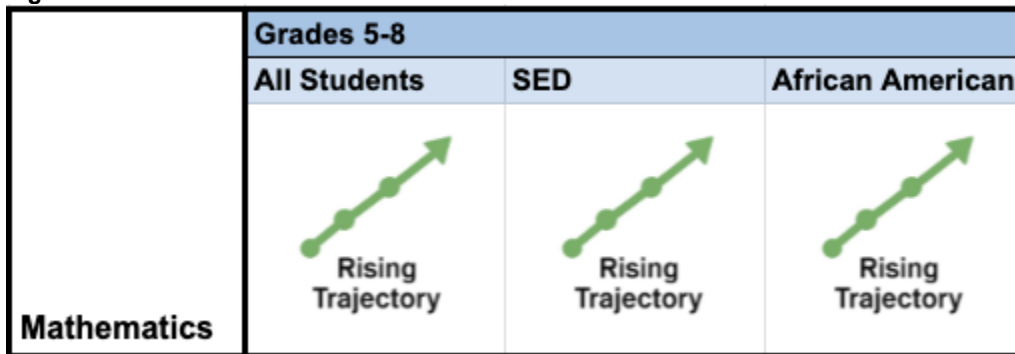


Determination: Garvey/Allen met standards in English Language Arts for All Students and student groups.

Mathematics

The multi-year trajectory for mathematics shows a mixed but generally upward trajectory over time, with sustained improvement across years and student groups. Although the school has not yet met the state standard in Mathematics, the upward trend reflects meaningful and measurable progress toward closing the gap. This trajectory provides evidence that the school is on an established course of growth and improvement in this content area. It should be noted that year-over-year changes in enrollment and grade-level configuration may introduce some variability in cohort-level results; however, this contextual factor does not alter the fundamental finding. The record is limited to verified state data, as no supplemental data was submitted by the school within the parameters of CDE data use procedures.

Figure 6: Mathematics Performance on CAASPP



Determination: Garvey/Allen has met standards for Mathematics for All Students or for student groups.

Does the School Meet Standards in Other State Indicators?

For state indicators other than English Language Arts and Mathematics, including both academic (ELPI) and non-academic indicators (Chronic Absenteeism and Suspension),

Dashboard Status results were reviewed to determine whether the school meets state performance standards. The Dashboard provides a standardized, statewide accountability framework and represents the primary evidence used to assess performance on these indicators. Under the Dashboard accountability system, a school is considered to have met standards for a given indicator when it receives a blue or green performance level. Multi-year Dashboard results over the term of the charter were reviewed to assess whether performance was generally consistent with meeting standards over time, recognizing that individual years may not fully reflect a school’s typical performance.

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 7, Garvey/Allen did not receive a performance level in any of the five reporting years.

Figure 7: ELPI Performance on the CA Dashboard

English Learner Progress				
Student Group:	2022	2023	2024	2025
All	Fewer than 11 students			

Determination: ELPI data is limited due to the minimum student count required to generate a performance level on the California Dashboard, resulting in no color designation across the charter term. No supplemental evidence was provided. Accordingly, the available data does not support a meaningful analysis of trends or progress toward English language proficiency.

Chronic Absenteeism

The Chronic Absenteeism indicator measures the percentage of students who are absent for 10 percent or more of instructional days. Consistent with Education Code section 47607(c)(1), staff reviewed multi-year absenteeism trends to assess current performance and progress over time. The school’s Chronic Absenteeism results are historically high and have not met state performance standards across multiple years. Although the school demonstrated an overall positive trend on the 2024 Dashboard, absenteeism further increased in 2025 across all student groups. These results indicate that attendance continues to be an area in need of focused improvement, particularly given its direct relationship to student access, instructional time, and overall academic progress. The indicator therefore informs both the standards determination and the school’s broader conditions for supporting student engagement.

Figure 8: Chronic Absenteeism Performance on the CA Dashboard

Chronic Absenteeism				
Student Group:	2022	2023	2024	2025
All	Very High			
African American	Very High			
Hispanic	Very High			
Socioeconomically Disadvantaged	Very High			

Determination: Garvey/Allen has not met standards for Chronic Absenteeism.

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 9, Garvey/Allen’s Suspension Rate results show the school meeting performance standards across the majority of years and student groups.

Figure 9: Suspension Rate Performance on the CA Dashboard

Suspension Rate				
Student Group:	2022	2023	2024	2025
All	Very Low			
African American	Very Low			
Hispanic	Very Low			
Socioeconomically Disadvantaged	Very Low			

Determination: Garvey/Allen has met standards for Suspension Rate for All Students and other student groups.

Recommendations

Due to the school not meeting standards across student groups for Chronic Absenteeism, it is recommended that the school develop and implement a Comprehensive Improvement Plan to address Chronic Absenteeism, containing the following:

- Clear, measurable goals for growth disaggregated by the All Student Group and all other student groups
- Specific, research-aligned intervention strategies the school will use to address areas of need
- Defined timelines and progress benchmarks
- Growth metrics
- Mid-Year and Annual Updates to RCOE and/or the Board

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 10: 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

RCOE has identified areas of the Renewal Petition that failed to explicitly address new legal requirements that have become effective since Garvey/Allen's last petition approval or will be in effect during the upcoming term. RCOE recognizes that a charter petition is not designed to include any and all laws that a charter school must comply with. Rather, RCOE evaluates whether the changes in the law reasonably relate to those elements for which a charter school must provide a reasonably comprehensive description and therefore should be addressed in the Renewal Petition. The following summarizes the deficiencies:

1. K-2 Reading Screener (*Element 1*)

The Renewal Petition recognizes the use of "formative assessments" and "benchmark assessments," but does not specifically acknowledge the requirements imposed by Education Code section 53008. (Petition, pp. 103-104, 149.) Starting in the 2025-26 school year, Charter Schools must assess pupils in Kindergarten and grades 1 and 2 for reading difficulties. The assessment must be adopted by the Charter School's governing board. Since the screener "should be considered part of a school's comprehensive instructional strategy", a more reasonably comprehensive description of its educational program (Elements 1-2) would acknowledge this requirement.

2. Required Board Trainings (*Element 4*)

The Renewal Petition acknowledges that the Board will receive training to "ensure they have the proper tools and knowledge to govern a charter school." Areas of training referenced include the Brown Act, Political Reform Act, and ethics. A more reasonably comprehensive description would also include reference to the mandatory school finance training required by AB 640, which was enacted on January 1, 2026.

3. Expansion of Mandatory Reporter Training (*Element 7*)

Page 183 of the Petition recognizes that all employees are considered mandated reporters and must receive training annually. SB 848, as of July 1, 2026, requires Charter Schools to adopt written policies that identify appropriate boundaries between students and employees, volunteers, contractors, and other students. The policies must also include parameters of appropriate communication before, during, and after school. SB 848 also expands the definition of "mandated reporters" to include volunteers, contractors, governing board members, and all school employees. Charter School must provide annual training to all mandated reporters.

4. Inclusion of All Elements in School Safety Plan (*Element 7*)

Page 186 of the Renewal Petition identifies that its School Safety Plan must include subsections A-N of Education Code section 32282(a)(2). As a school serving students in grades 7 and 8, Garvey/Allen’s safety plan must also include subsection “O”. Subsection “N” requires schools, no later than March 1, 2026, to include procedures to identify parents, guardians, and employees when a school confirms an immigration enforcement officer is on site. Subsection “O” requires the School Safety Plan to include protocols to address students reasonably believed to be experiencing an opioid overdose. Charter School did not provide a copy of its School Safety Plan with the petition.

5. High School Student ID Card Requirements (*Element 7*)

The Charter School serves grade spans K through 8. As of July 1, 2025, all charter schools issuing school identification cards (“ID Cards”) to their 7-12 grade students must include the number for the 988 Suicide and Crisis Lifeline. (Ed. Code § 215.1.) Additionally, effective July 1, 2026, ID Cards must include the phone number and text line for The Trevor Project’s LGBTQ+ suicide hotline. (*Id.*) Both these requirements will be in effect at the start of the Renewal Petition term and relate to student safety.

6. Referral Protocols Addressing Behavioral Health Concerns (*Element 7*)

RCOE also identified that the Renewal Petition did not specifically address the requirements of SB 857 (Education Code section 49428.2). As of January 1, 2026, charter schools must adopt a policy that addresses referral protocols for pupils exhibiting behavioral health concerns. The policy must, at a minimum, address the needs of high-risk groups identified by statute, and address any training to be provided to pupils.

C. Fiscal Review

Monitoring the fiscal viability of a charter school 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.

Figure 11: Fiscal Oversight Review Standards

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

Denial Standard

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.

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 fiscal factors, the chartering authority may consider such concerns if they are persistent or indicate systemic financial instability.

Figure 12: Governance Oversight Review Standards

Review Standards	
Compliance with Legal and Charter Requirements	<ul style="list-style-type: none"> ● 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	<ul style="list-style-type: none"> ● The 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 ● 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

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.

Figure 13: Student Enrollment Oversight Review Standards

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

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

Determinations for Consideration

No findings were determined.

END OF DOCUMENT

Refer to page 1 Renewal Options for Board Action