



**Renewal Petition Staff Report  
Excelsior Charter Schools Corona Norco  
April 1, 2026**

Part I. Executive Summary: Staff Report for Excelsior Charter Schools Corona Norco

<b>School Overview</b>			
<b>Charter Organization:</b>	Excelsior Charter Schools Corona Norco	<b>Current Grades Served:</b>	7-12
<b>District Boundary</b>	Corona-Norco Unified School District	<b>Current Authorized Grades:</b>	7-12
<b>Year Opened:</b>	2018	<b>Current Enrollment:</b>	125
<b>Previous Renewal Year(s):</b>	N/A	<b>Term Expiration:</b>	June 30, 2026

**I. Background**

Excelsior Charter Schools Corona Norco operates a 7-12, non-classroom-based charter school in Corona that includes a single school site.

On January 16, 2026, Excelsior Charter Schools Corona Norco (“Excelsior” or “Charter School”) submitted a 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 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 Excelsior’s original petition was granted in 2017. This report contains the analysis and proposed findings of fact related to the Renewal Petition for Board consideration, including the Staff’s analysis of whether Excelsior 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 is 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 (EC) 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 Excelsior.

#### 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 each pupil subgroup currently exceed, meet, or fall below 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, is based on 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. Insufficient Progress Toward Standards <sup>1</sup>

The County Board has the authority to deny renewal of the charter petition if it determines

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<sup>1</sup> Only applicable to middle performance category

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 interests of students: AND
- This determination requires greater weight to be provided to performance on measurements of academic performance<sup>2</sup>.

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

#### Findings for Consideration (Academic Performance)

No findings were determined for measures of academic performance.

#### Findings for Consideration (Other Academic Indicators)

No findings were determined.

#### Comments (Academic Performance)

No findings were determined. The absence of findings does not indicate insight into schoolwide performance; instead, it should be understood as an indeterminate.

This report has identified a potentially recurring structural challenge in assessing school-wide performance and has correspondingly recommended that the school explore alternative measures to address this limitation.

### 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.<sup>3</sup>

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<sup>2</sup> Education Code Section 47607.2(b)(2)

<sup>3</sup> Education Code Section 47607(b)

## Findings for Consideration

- **Petition Preparation:** Portions of the Renewal Petition incorrectly refer to the petition as one for a “Countywide Benefit Charter School,” even though the school is not countywide and is authorized by the Riverside County Board of Education on appeal from the Corona-Norco Unified School District (Petition, p. 8).
- **Incorrect Statutory References:** Similarly, the Renewal Petition references statutory elements applicable to countywide charter petitions under Education Code section 47605.6 instead of the elements for district-authorized charter schools under Education Code section 47605.
- **Element G – Health and Safety Procedures:** The Renewal Petition references updates to the charter school’s 2025 comprehensive safety plan but does not address legal updates for 2026. Additionally, the Safety Plan included in Appendix R reflects the 2024–2025 cycle and does not incorporate several updates described in the petition. The charter school’s governing board approved a Site Safety Plan for the 2025–26 school year on February 20, 2026. While the plan incorporates many legal requirements, it does not include all updates referenced in the petition.
- **Student Identification Card Requirements:** State law requires student ID cards for grades 7–12 to include the 988 Suicide and Crisis Lifeline beginning July 1, 2025, and the Trevor Project LGBTQ+ suicide hotline beginning July 1, 2026. Although the petition acknowledges these requirements, they are not reflected in the submitted plan with the charter petition or the recently approved safety plan.
- **Behavioral Health Referral Policy:** Effective January 1, 2026, charter schools must adopt a policy establishing referral protocols for students exhibiting behavioral health concerns. The Renewal Petition does not address this requirement.

### 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:<sup>4</sup>

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<sup>4</sup> Education Code Section 47607(e)

- 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.

Comment

The charter school is not currently using the Standardized Account Code Structure (SACS) financial reporting software as required by the Riverside County Office of Education Memorandum of Understanding (MOU).

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:<sup>5</sup>

- 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.

<sup>5</sup> Education Code Section 47607(e)

## 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 attend<sup>6</sup> 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.

END OF PART ONE

*Refer to page 1 Renewal Options for Board Action*

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<sup>6</sup> Education Code Section 47607(d)(3)

## Part II. DETAILED ANALYSIS: Staff Report for Excelsior Charter Schools Corona Norco

## 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”).<sup>7</sup> 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

<sup>7</sup> See <https://www.caschooldashboard.org/about/accountability>.

School performance determinations are based on the two most recent, consecutive years of Dashboard data. Schools qualifying for Dashboard Alternative School Status (DASS) are held to a different renewal evaluation standard.<sup>8</sup>

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 the lowest performance: CDE has designated Excelsior 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”<sup>9</sup>.

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<sup>8</sup> See <https://www.cde.ca.gov/ta/ac/activeschools.asp>.

<sup>9</sup> Ed. Code § 47607.2(b)(2).

### 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:

- 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 Excelsior as a “middle-performing” charter school pursuant to Education Code section 47607.2. RCOE has confirmed that Excelsior 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 <sup>10</sup>	
Dashboard Performance	<ul style="list-style-type: none"><li>• Schoolwide performance on the state indicators</li><li>• Student group performance on the state indicators</li><li>• Dashboard reporting on the local indicators</li><li>• Greater weight shall be provided to measures of academic performance: ELA, Math, and English Learner Progress</li></ul>
Verified Data <sup>11</sup>	<ul style="list-style-type: none"><li>• Measurable increases in academic achievement demonstrated by a year's progress for each year in school; or</li><li>• Strong postsecondary outcomes defined by college enrollment, persistence, and completion rates equal to similar peers</li></ul>

**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.

<sup>10</sup> Education Code Sections 47607(c), 47607.2(b)

<sup>11</sup> 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.

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)

Figure 3: Middle-Tier Performance Evaluation Protocol

3. Performance Review: Excelsior

**Does the School Meet Standards in ELA and Mathematics?**

*(All Students; Student Groups)*

Consistent with EC 47607(c)(1), 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  $\geq 0$ . Neither the School’s ELA nor mathematics meets the standard for schoolwide performance; due to small n-size, the school does not have sufficient data for any 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 current Dashboard Status, independent of trajectory/growth.

English Language Arts	Student Groups	Dashboard Color	DFS	Percent	Meets Standards
	All	1/4	1/5	25%	Not Met
	Socioeconomically Disadvantaged	NA	NA		NA
	Hispanic	0/1	0/1		NA
	White	NA	NA		NA
Mathematics	Student Groups	Dashboard Color	DFS	Percent	Meets Standards
	All	0/4	0/5	0%	Not Met
	Socioeconomically Disadvantaged	NA	NA		NA
	Hispanic	0/1	0/1		NA
	White	NA	NA		NA

Figure 4: ELA/Math Standards Met/Not Met

**Determination:** Excelsior does not meet standards in English Language Arts or Mathematics for the All-Students group.

**Has the School Made Sufficient Progress towards Meeting 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.

**English Language Arts and Mathematics**

Excelsior (Corona-Norco) administers Star Math and Star Reading as its primary interim assessments across grades 7–12. Submitted student-level score data from 2023–24 and 2024–25 reflects a total enrolled population of approximately 130–140 students across both years. Tested cohorts within individual grade levels ranged from 3 to 22 students per grade per year.

**Determination:** Cohort sizes ranging from 13 to 34 students constrain the inferential weight that can be placed on any single administration or year-over-year comparison. Small cohorts are highly sensitive to enrollment fluctuation, assessment participation rates, and random performance variation unrelated to instructional conditions. Accordingly, point-in-time scores and year-over-year comparisons cannot reliably be attributed to school-wide academic trends. Considered in isolation, Summative CAASPP scores and Renaissance Star assessment results carry limited inferential weight. A potentially more complete picture emerges when these measures are examined alongside the state and local indicators reviewed below. A comprehensive performance determination remains inconclusive.

**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 5, Excelsior did not receive a performance level in any of the five reporting years.

English Learner Progress					
Student Group:	2019	2022	2023	2024	2025
All	Fewer than 11 students				

**Figure 5:** ELPI Performance on the CA Dashboard

**Determination:** ELPI data is limited due to the 30-student minimum threshold required for color-level reporting on the California Dashboard. The absence of reportable data precludes longitudinal trend analysis.

### 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. As reflected in Figure 6, Excelsior received a performance level in only one of the four reporting years.

College/Career					
Student Group:	2019	2022	2023	2024	2025
All	31.8%		15%	28%	21.9%

Figure 6: CCI Performance on the CA Dashboard

**Determination:** CCI performance data is limited due the 30 student minimum methodology used in the California Dashboard. The presence of a single year does not support longitudinal analysis.

### 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. As reflected in Figure 7, Excelsior received a performance level in only two of the five reporting years.

Chronic Absenteeism					
Student Group:	2019	2022	2023	2024	2025
All	0%	3.6%	0%	0%	0%

Figure 7: Chronic Absenteeism Performance on the CA Dashboard

**Determination:** Chronic Absenteeism data is limited due to the 30-student minimum threshold required for color-level reporting on the California Dashboard. The availability of only two years of data does not support longitudinal trend analysis. However, the available percentages warrant a note that the school has maintained a low chronic absenteeism rate across the reporting period.

## 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 inconsistent performance with years of improvement followed by regressions. As reflected in Figure 8, Excelsior received a performance level in only one of the five reporting years.

Graduation Rate					
Student Group:	2019	2022	2023	2024	2025
All	83.3%	85.2%	90%	91.4%	90.6%

**Figure 8:** Graduation Rate Performance on the CA Dashboard

**Determination:** Graduation rate performance data is limited due to the 30-student minimum threshold required for color-level reporting on the California Dashboard. The availability of a single year of color-level results does not support longitudinal trend analysis. However, the available percentages warrant noting that the school has maintained a strong graduation rate throughout the reporting period.

### 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, Excelsior’s Suspension Rate results show mixed performance across years, with the school meeting state performance standards in the majority of reporting years for the All Students group and the Socioeconomically Disadvantaged student group. While the Hispanic student group met standard in one year, and the White student group did not meet standard in either of the two years it received performance data. The overall pattern indicates inconsistent performance over time.

Suspension Rate					
Student Group:	2019	2022	2023	2024	2025
All	0%	Medium 2%	1.2%	1.2%	3%
Hispanic		Medium 3.6%	0%	1.1%	4.1%
Socioeconomically Disadvantaged		Medium 2.9%	1.4%	1.3%	2.1%
White		Very Low 0%	2.2%	2.2%	

Figure 9: Suspension Rate Performance on the CA Dashboard

**Determination:** Excelsior demonstrates mixed performance results for Suspension Rate. The limitations identified above suggest the school would benefit from developing additional local measures to better assess and demonstrate growth and progress toward standards.

### Recommendations

Due to the school's size and Dashboard methodology constraints, it is unclear whether the school's future performance will yield sufficient data for conclusive indicator-level determinations.

The limitations identified in the section above suggest the school would benefit from developing additional local measures to better assess and demonstrate growth and progress toward standards. Staff recommends that the school explore this development through metrics created in collaboration with RCOE.

## 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"><li>● Be substantive, not a list</li><li>● Address all aspects of each element</li><li>● Be specific to this charter</li></ul>

**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

Education Code section 47607(b) requires Charter Schools to include any new legal requirements for Charter Schools since the Charter School's last renewal. RCOE recognizes that a charter petition is not intended to include 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 RCOE's findings.

#### **Preparing Renewal Petition Specific to Proposed Charter School**

The Petition referenced a countywide charter, although it is authorized to operate by the Riverside County Board of Education on appeal from the Corona-Norco Unified School District. For example, the Petition's introduction letter submitted with its renewal petition states that it is a "Petition for the Renewal of a Countywide Benefit Charter School" (Petition, p.8). Accordingly, the Renewal Petition provides comprehensive descriptions of, and refers to, the elements proscribed in Education Code section 47605.6 applicable to countywide charter petitions, rather than the elements proscribed by Education Code section 47605 applicable to district-

authorized charter schools (Petition, pp. 3, 113).

**Element G: Health and Safety Procedures Do Not Fully Address New Legal Requirements.**

The Renewal Petition references the updates the Charter School will make to its 2025 comprehensive safety plan, not its 2026 safety plan. Page 134 of the Renewal Petition states:

*ECSN shall update for the 2025 comprehensive safety plans new requirements to include ICP (Instructional Continuity Plan), new rules for active shooter drills, student ID cards, new crisis number hotlines, AED location notification, cell phone policy, immigration policy updates including parent notification, and opioid prevention procedures.*

These references are appropriate to reflect the legal changes that occurred in 2025 but the Renewal Petition does not address legal updates for 2026. The Safety Plan submitted as Appendix R includes a “2024-2025” signature page and does not incorporate the proscribed changes described in page 134 of the Renewal Petition. However, at a special board meeting on February 20, 2026, Petitioner approved a Site Safety Plan for the Charter School for the 2025-26 school year. The Site Safety Plan recently approved by the Charter Schools incorporates most but not all the legal requirements that the Renewal Petition says the safety plan will address. For example, 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§ 215.5.) Additionally, effective July 1, 2026, ID Cards must include the phone number and text line for The Trevor Project’s LGBTQ+ suicide hotline. (*Id.*) Page 140 of the Renewal Petition recognizes these new requirements, but they are not included in the Site Safety Plan submitted with the Renewal Petition or recently approved by Charter School’s governing board.

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. The Petition does not address this new legal requirement.

Notwithstanding the above, RCOE evaluated these deficiencies against all the other changes required to be addressed in the Renewal Petition. In totality, the Renewal Petition has been updated and is consistent with these revised requirements.

### 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.

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

**Figure 11:** Fiscal Oversight Review Standards

## 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.

### Recommendation

The charter school shall use the Standardized Account Code Structure (SACS) financial reporting software as required by the Riverside County Office of Education Memorandum of Understanding (MOU).

## 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.

### 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

<p>Board Oversight and Effectiveness</p>	<ul style="list-style-type: none"> <li>● The County Board has the capacity to fulfill its responsibilities effectively</li> <li>● Maintains independence and avoids conflicts of interest</li> <li>● Actively participates in meetings, coming prepared and engaged</li> <li>● Oversees resources and budgets responsibly</li> <li>● Addresses audit findings and implements corrective actions</li> <li>● Ensures stable and effective school leadership</li> <li>● Engages educational partners in decision-making processes</li> <li>● Meets or actively works toward the student outcomes outlined in the charter</li> </ul>
<p>Due Process</p>	<p>Ensure the school has been provided due process to include the following:</p> <ul style="list-style-type: none"> <li>● At least 30 days' notice of the alleged violation</li> <li>● Reasonable opportunity to cure the violation, including a corrective action plan proposed by the charter school</li> </ul>

**Figure 12:** 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"><li>● Suspension</li><li>● Expulsion</li><li>● Involuntary Removal</li></ul>
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"><li>● At least 30 days' notice of the alleged violation</li><li>● Reasonable opportunity to cure the violation, including a corrective action plan proposed by the charter school</li></ul>

**Figure 13:** Student Enrollment Oversight Review Standards

## Determinations for Consideration

No findings were determined.

END OF DOCUMENT

*Refer to page 1 Renewal Options for Board Action*