

**Initial Petition - Countywide  
Staff Report  
Altus Schools Riverside County  
January 20, 2026**

Part I. Executive Summary: Staff Report for Altus Schools Riverside County

<b>Non-Profit Corporation:</b>	Altus Schools Southern California
<b>Proposed District Boundaries:</b>	Moreno Valley Unified School District Desert Sands Unified School District Murrieta Unified School District
<b>Program Type:</b>	Nonclassroom-Based
<b>Proposed Grades Served:</b>	TK-12
<b>Anticipated Enrollment:</b>	603 in 2026-2027

**I. Proposed Petition: Countywide**

Altus Schools Southern California (“Petitioner” or “Nonprofit”) proposes to establish a new nonclassroom-based countywide benefit charter school by the name of Altus Schools Riverside County (“Charter School” or “ASRC”), to eventually serve grades TK-12, within the boundaries of the following School Districts (“The Districts”): Moreno Valley Unified School District, Desert Sands Unified School District, and Murrieta Unified School District. If the Petition is denied, Audeo Valley Charter School and Altus Schools Coachella Valley will remain open and continue to operate. If the Petition is approved, the Petitioner would close and consolidate the following charter schools authorized by the Riverside County Board of Education under the ASRC umbrella: Audeo Valley Charter School and Altus Schools Coachella Valley. The Nonprofit submitted its appeal to the Riverside County Board of Education (“Board”) following minimum 30-day notification to The Districts in which it plans to operate.

## II. Proposed Options for Board Action

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

1. DENY the Petition and adopt, as findings of fact, the Proposed Findings identified in the Staff Report, concluding the Countywide Petition did not meet the requirements of Education Code Section 47605.6.
2. Grant the Countywide Petition, based on the Board's affirmative findings required by Education Code Section 47605.6, and its determination that no statutory basis for denial exists, for a 5-year term, commencing July 1, 2026, and concluding June 30, 2031, provided that the a Memorandum of Understanding between the Charter School and RCOE is signed prior to the date of commencement of the new term.

## III. Procedural Background and Legal Considerations

The Charter Schools Act ("Act") governs the creation of California charter schools and provides standards and criteria for reviewing a charter petition. The Act reflects a preference for district authorized charter schools. An alternative pathway for submission of a petition is directly to a county board as a countywide benefit charter school, which bypasses a local school district. The legal standards and criteria for a countywide charter petition are more strict than the standards and criteria for other types of charter school petitions. For example, the legal premise for a petition submitted to a district under Education Code 47605 is that a district "shall not deny" a petition unless it makes written factual findings. (Ed. Code, § 47605, subd. (c).) Whereas the legal premise for a petition submitted under Education Code 47605.6 is that "the county board of education 'shall deny'" a petition if there are findings. (Ed. Code, § 47605.6, subd. (b).)

A county board of education may approve a petition for a charter school that operates at one or more sites within the geographic boundaries of the county and provides instructional services not generally provided by a county office of education. A county board of education "shall deny" a petition for the establishment of a countywide charter school if the board finds one or more of the evaluation criteria outlined in Education Code Section 47605.6(a) and (b). If the Petition is denied, "the petitioner shall not elect to submit the petition" to the State Board. (Ed. Code, § 47605.6, subd. (k).)

To approve a countywide charter petition, a county board of education must also make certain threshold findings unique to countywide charters. Specifically, a county board of education may approve a countywide charter only if it makes each of the following findings, in addition to the other requirements of Education Code section 47605.6, above.

- I. The educational services to be provided by the charter school will offer services to a pupil population that will benefit from those services.
- II. Such a pupil population cannot be served as well by a charter school operating in only one school district in the county.
- III. Granting the charter is consistent with sound educational practice.
- IV. The charter school has a reasonable justification for why it could not be established by petition to a school district pursuant to Education Code section 47605.

The county board is required to hold a public hearing within 60 days of receiving the petition to consider the level of community support. A final decision to grant or deny the charter must be made within 90 days of receipt, unless both parties agree to extend the timeline by up to 30 days. A staff report with findings and recommendations must be published at least 15 days prior to the public hearing at which the decision is scheduled.

On November 20, 2025, a charter petition ("Petition" or "Charter Petition") was submitted to the Riverside County Board of Education ("Board" or "County Board") proposing to establish the Altus Schools Riverside County charter school ("Charter School") as a countywide charter school authorized by the County Board under Education Code section 47605.6. The Petition proposes an initial five-year term, from July 1, 2026 to June 30, 2031. The proposed Charter School would be operated by the Nonprofit currently operating two existing charter schools authorized by the County Board: Audeo Valley Charter School and Altus Schools Coachella Valley.

The County Board held a public hearing on January 14, 2026 to consider the terms of the Petition and the level of support for the proposed Charter School by parents/guardians, teachers, and community members. The Board is required to take action to either grant or deny the Petition within 90 days of receipt, unless the parties agree to a 30-day extension. (Ed. Code, § 47605.6, subd. (b).) Board action is scheduled to take place at the Board meeting of February 4, 2026. Riverside County Office of Education ("RCOE") staff and legal counsel ("Review Team") reviewed the Petition and developed proposed findings of fact for consideration by the Board. This report and any other staff recommendations shall be published at least 15 days before the public hearing at which the Board will either grant or deny the charter. (Ed. Code, § 47605.6, subd. (b).)

#### IV. Board's Authority

The Board is responsible for evaluating and making the final determination to approve or deny a charter school petition. In doing so, the Board has the authority to assess whether the findings of fact presented in the staff report support approval or denial, in accordance with the criteria established in Education Code Section 47605.6.

#### V. Executive Summary of Findings

The following **Executive Summary of Findings** is provided to assist the Board in its consideration of the petition submitted by Altus Schools Southern California. It is intended to capture the essential issues relevant to the Board's decision regarding approval or denial.

The **Detailed Analysis in Part II of this report** offers a fuller explanation of these findings, including the reasoning, context, and information that informed the staff's assessment. In instances where additional documentation or supporting materials were deemed necessary, these have been included as attachments to the report.

#### Requirements For Countywide Benefit Petitions

##### Countywide Charter Threshold Findings

To approve a countywide charter petition, a county board of education must first make certain threshold findings unique to countywide charters. Specifically, a county board of education may approve a countywide charter ***only if it makes each of the following affirmative findings***, in addition to the other requirements of Education Code section 47605.6:

1. The petition must clearly identify the pupil population the school is designed to serve; AND The petition must explain how the proposed educational program is specifically intended to meet the needs of that population and provide educational benefit; AND
2. The petition must explain why these pupils cannot be served as well by a charter school that operates in only one school district in the county; AND
3. Granting the charter is consistent with sound educational practice; AND
4. The charter school has provided reasonable justification for why it could not be established by petition to a school district

**1. Pupil Population/Educational Benefit Requirement**

**High School Program: Met**

**Elementary/Middle School: Not Met**

Based on review of the Petition, an educational benefit can be affirmed for high school pupils, but not for middle school or elementary pupils. The high school program is aligned to the needs of at-risk and credit-deficient students through a defined alternative education model that includes flexible pacing, individualized learning plans, credit recovery, and multiple completion pathways. The Petition does not, however, identify distinct middle school or elementary pupil populations with unmet needs, nor does it explain how a credit recovery model would provide educational benefit to early learners.

**2. Students Cannot be Served as Well within a District**

**High School Program: Not Met**

**Elementary/Middle School: Not Met**

Based on a review of the proposed TK–12 program as a whole, and in light of existing district- and County-authorized programs, the petition does not demonstrate that operating as a countywide charter would improve educational outcomes or access for students compared to continued operation under district-specific authorization. While the petition emphasizes administrative efficiency and operational consistency, those considerations are operational in nature and do not constitute a basis for establishing countywide necessity. The record reflects that the Charter School is currently serving the proposed student populations effectively under the current authorization structure, and it does not identify an educational limitation or barrier that countywide authorization is necessary to address

**3. Sound Educational Practice**

**High School Program: Met**

**Elementary/Middle School: Not Met**

The Review Team is satisfied that the educational program proposed for high school pupils reflects sound educational practice, as it is clearly aligned to the needs of at-risk and credit-deficient students through a well-articulated alternative high school model. However, the record does not support a similar conclusion for middle school or elementary pupils. The Petition does not demonstrate that the proposed countywide configuration is developmentally appropriate or educationally coherent for those grade spans, nor does it show that expanding the program countywide would improve educational practice beyond what is already being achieved under the existing

authorization structure.

**4. Reasonable Justification for the Inability to be Established by a Local District  
Threshold Met: No**

The Petition does not demonstrate reasonable justification for why the Charter School could not be established or continue to operate through district-level charter authorization. While the Petition emphasizes consistency and administrative efficiency, the record reflects that the Charter School has already successfully established and operated district-bounded charter schools within the County, including schools authorized on appeal, and that those schools have functioned effectively under the existing authorization structure. The Petition also relies on enrollment preference and geographic access arguments that do not establish an authorization barrier, particularly given the school's nonclassroom-based, primarily independent study model. Overall, the petition does not identify new or changed circumstances that would prevent continued or expanded operation through district-level petitions, and its justification for countywide authorization is grounded in operational preference rather than necessity.

**Statutory Basis for Denial**

Upon meeting the aforementioned Countywide Threshold, the board must satisfy the additional statutory criteria listed below. The County Board **shall deny** a petition for the establishment of a countywide charter school if it finds one or more of the following:

- I. The petition does not contain reasonably comprehensive descriptions for each of the required elements (A-P); OR
- II. The charter school presents an unsound educational program for the pupils to be enrolled in the charter school; OR
- III. The petitioners are demonstrably unlikely to successfully implement the program set forth in the petition; OR
- IV. The petition does not contain the number of signatures required by subdivision (a) of Education Code section 47605.6; OR
- V. The petition does not contain an affirmation of each of the conditions described in subdivision 47605.6(e); OR
- VI. The petition does not contain a declaration whether or not the charter school shall be deemed the exclusive public employer of the employees of the charter school; OR
- VII. The Board determines there is any other basis that justifies denial of the petition

## Statutory Elements

### I. Descriptions Not Reasonably Comprehensive

The Petition does not provide a reasonably comprehensive description of the proposed educational program, particularly for the elementary grade span. While the Petition is detailed with respect to secondary instruction, it does not adequately describe how the proposed program will operate across a full TK–12 grade span or address the distinct developmental and instructional needs of younger students. Key deficiencies include:

- ***TK-5 Program Coherence.*** The Petition relies on a secondary independent study and credit-recovery model developed for grades 6–12 and does not adequately explain how that model will be adapted for elementary students. As written, it extends a 6–12 program to TK–5 without describing the elementary-specific instructional design and supports needed for early learning.
- ***Instructional Model Articulation.*** The Petition references multiple instructional models—home-based, virtual, and hybrid—without clearly defining or differentiating them. As a result, the proposed instructional approach lacks clarity and does not present a coherent, well-articulated model with clearly aligned supports. As such, the Petition does not explain what students and families should expect in practice, including instructional delivery, teacher–student interaction, parent roles, or grade-span–specific supports. This lack of specificity limits both staff’s ability to evaluate feasibility and implementation fidelity and families’ understanding of the day-to-day instructional experience.
- ***Gradespan Articulation.*** The Petition does not adequately differentiate the educational program across elementary, middle, and high school grade spans or explain how developmental needs will be addressed at each level. As written, it extends a secondary program design to younger grades without describing the elementary-specific structures needed for developmentally appropriate implementation.
- ***Acquisition of Reading.*** The Petition assumes students enter with established reading skills and does not explain how foundational literacy acquisition and fluency will be supported for students in early grades. The absence of elementary-specific reading instruction and corresponding MTSS supports raises concerns about the program’s capacity to serve students who have not yet developed reading proficiency.
- ***Multi-tiered Systems of Support (MTSS).*** Although the Petition outlines a general MTSS framework, it does not explain how supports will be differentiated by grade span or student need. The lack of operational detail, particularly for elementary students, raises concerns about the viability of the proposed MTSS model.
- ***Lack of Articulated Purpose.*** The Petition does not clearly articulate the purpose of the proposed charter school or identify the specific pupil populations it intends to serve, particularly at the elementary level. Instead, it applies a secondary

credit-recovery model to TK–5 without explaining how that model addresses the distinct needs of students acquiring foundational skills.

- ***Insufficient English Learner Program.*** The Petition does not present a comprehensive or clearly articulated plan for serving English Learners in the TK–5 grade span. Elementary English Learner support is minimally described and does not explain how services will be delivered, differentiated, or aligned to grade-level instruction.
- ***Annual Goals and Metrics.*** The annual goals and metrics stated in the Petition lack differentiation by grade level. The Petition does not adequately describe how local assessments will be used, including the specific plan or means by which results will inform instructional adjustments and support in the elementary grades.

Elements B-P: No Findings Determined

## II. Unsound Education Program

- A. ***Lack of Instructional Coherence.*** The proposed program does not fully reflect sound educational practice because the educational program, as designed, is not coherent or developmentally appropriate across the full TK–12 grade span. While the Petition presents a secondary independent study and credit-recovery model that is generally aligned with the needs of high school students, that same model is applied to middle school and elementary grades without sufficient modification to support foundational learning, grade-level instructional progression, or age-appropriate delivery of instruction. The Petition assumes student readiness for independent study and course-based progression that is not developmentally appropriate for younger learners and does not demonstrate how instructional design, staffing, or student supports will be adapted to meet those needs.

In particular, the Petition does not adequately address elementary and middle school instructional coherence, early literacy acquisition, differentiated English Learner services, or grade-span–appropriate Multi-Tiered Systems of Support. The absence of defined instructional structures, clear expectations for teacher–student interaction, and differentiated supports for younger students raises substantive concerns regarding the program’s ability to deliver consistent, effective instruction outside of a traditional classroom setting. As a result, the proposed program, as configured for grades TK–8, lacks the foundational elements necessary to ensure student access to a sound educational experience and therefore does not meet



the standard of sound educational practice for those grade spans, notwithstanding that the high school program is educationally sound.

- B. ***Failure to Acknowledge Mandatory Reading Screener.*** The Petition fails to acknowledge the legal requirement for the administration of a state-approved reading screener for students in grades K-2. The required screening is supposed to be considered part of the school’s “comprehensive instructional strategy.” If the screening is not implemented, it has the potential to negatively impact students because those with reading difficulties will not be identified at the earliest stage of their education.

### III. Demonstrably Unlikely to Successfully Implement Program

No Findings Determined

### IV. Does Not Include Signatures

No Findings Determined

### V. Does Not Include Affirmations

No Findings Determined

### VI. Employer Declaration Not Provided

No Findings Determined

**VII. Any Other Basis**

No Findings Determined

END OF PART I.

*Refer to page 1 Proposed Options for Board Action*

## Part II. DETAILED ANALYSIS: Staff Report for Altus Schools Riverside County

## 1. Background

Altus Schools Southern California (“Petitioners” or “Nonprofit”) submitted a charter petition (“Petition” or “Charter Petition”) to the Riverside County Board of Education (“Board” or “County Board”) proposing to establish Altus Schools Riverside County (“Charter School”) as a countywide charter school authorized by the County Board under Education Code section 47605.6. Petitioners are a California nonprofit public benefit corporation operating a series of charter schools throughout California, but more specifically operates two nonclassroom-based charter schools in Riverside County. Audeo Valley Charter School (“AVCS”) was approved by the Board on March 3, 2021. Most recently, Altus Schools Coachella Valley (“ASCV”) was approved by the Board on June 11, 2025. Both schools were considered “continuing” charter which allowed for their approval during the nonclassroom-based moratorium imposed by Education Code section 47612.7. If approved, Petitioner states they will close AVCS and ASCV and operate both resource centers under the Charter School’s umbrella.

The Petition proposes an initial five-year term, from July 1, 2026 to June 30, 2031, with instruction commencing in the 2026-2027 school year. The Charter School proposes to operate at least four resource centers in Riverside County, including in Moreno Valley, Palm Desert, La Quinta, and Murrieta.

The Petition states the proposed Charter School will be operated by ASSC, a California nonprofit public benefit corporation. If approved, the Charter School would become part of the Altus brand and network of charter schools. Altus charter schools are predominately operated by two nonprofit corporations - ASSC and Altus Schools San Diego.

## 2. Legal Review Parameters

### General Review Criteria

California’s Charter Schools Act (“Act”) governs the creation of charter schools within the state, and provides standards and criteria for reviewing a charter petition. Countywide benefit charter schools are charter schools that operate at one or more sites within the geographic boundaries of the county in which it is approved, and provide instructional services that are not typically provided by a county office of education. (Ed. Code, § 47605.6, subd. (a)(1).)

While the Act signifies legislative intent to encourage the approval of *district-approved* charter schools, the encouragement is not extended to countywide charters schools. The criteria and legal standards to approve a countywide charter petition are more strict. For example, the legal standard for a petition submitted to a school district under Education Code 47605 is that a district “shall not deny” a petition unless it makes certain written factual findings. (Ed. Code, § 47605(c).) Whereas the legal standard for a petition submitted under Education Code 47605.6 is that the county board of education “shall deny” a petition if there are any findings. (Ed. Code, § 47605.6(b).)

More specifically, a county board of education may only approve a countywide charter school if it is satisfied that the charter presents a sound educational practice, and contains reasonable justification as to why it could not be established by a school district. (Ed. Code, § 47605.6, subd. (b).) The county board of education must find that the charter school's proposed educational services will be offered to a pupil population who will benefit from those services, and who cannot be served as well by a charter school operating in only one district in the county. (Ed. Code, § 47605.6, subd. (a)(1).) Additionally, a county board "shall deny" a petition establishing a countywide charter school if it finds one or more of the following, pursuant to Education Code section 47605.6, subdivision (b):

1. The charter school presents an unsound educational program for the pupils to be enrolled in the charter school.
2. The petitioners are demonstrably unlikely to successfully implement the program set forth in the petition.
3. The petition does not contain the required number of signatures.
4. The petition does not contain an affirmation of each of the conditions described in Education Code section 47605.6(e).
5. The petition does not contain reasonably comprehensive descriptions of all of the following:
  - a. Educational program, including annual goals for all pupils and pupil subgroups, and actions to achieve those goals
  - b. Measurable pupil outcomes identified for use by the charter school, aligned with the state priorities
  - c. Method by which pupil progress in meeting outcomes is to be measured
  - d. Location of each charter school facility that the petitioner proposes to operate
  - e. Governance structure, including process to ensure parental involvement
  - f. Employee qualifications
  - g. Health and safety procedures
  - h. Means to achieve a balance of racial and ethnic pupils, special education pupils, and English learner pupils that is reflective of the general population residing within the territorial jurisdiction of the county
  - i. Manner for conducting annual, independent financial audits
  - j. Suspension and expulsion procedures

- k. Retirement systems
  - l. Dispute resolution procedures
  - m. Admission policies and procedures
  - n. Public school attendance alternatives within the county
  - o. Employee return rights
  - p. School closure procedures
6. The petition does not include a declaration of whether the charter school shall be deemed the exclusive public school employer of its employees under the Educational Employment Relations Act.
  7. Any other basis that the county board of education finds justifies the denial of the petition.

(Ed. Code, § 47605.6(b).)

Notably, the seventh reason a county board of education may deny a countywide charter petition is unique. County boards of education are, therefore, granted very broad discretion to deny a countywide benefit charter petition, and may consider community impact, fiscal impact, or any other factor that may affect approval or denial.

### **Countywide Charter Threshold Findings**

To approve a countywide charter petition, a county board of education must also make certain affirmative threshold findings unique to countywide charters. Specifically, a county board of education may approve a countywide charter *only* if it makes *each* of the following findings, in addition to the other requirements of Education Code section 47605.6, above.

- A. The educational services to be provided by the charter school will offer services to a pupil population that will benefit from those services.
- B. Such pupil population cannot be served as well by a charter school operating in only one school district in the county.
- C. Granting the charter is consistent with sound educational practice.
- D. The charter school has a reasonable justification for why it could not be established by petition to a school district pursuant to Education Code section 47605.

### 3. Proposed Findings

The Review Team has identified the following possible findings for the Board’s consideration:

**1. The Petition Lacks the Threshold Requirements to Establish a Countywide Charter School.**

**A. Pupil Population Requirement**

**High School Program: Met**

**Middle School Program: Not Met**

**Elementary School Program: Not Met**

Education Code section 47605.6(a)(1) requires the County Board of Education to find that the educational services to be provided by a countywide charter school will offer services to a pupil population that will benefit from those services. Charter School intends to serve students in grades TK-12. Accordingly, the determination under this requirement must be based on a review of the Petition as a whole for each grade span. Based on that review, an educational benefit can be affirmed for high school pupils, but not for middle school or elementary pupils.

Pages 20–23 of the petition, titled “*Countywide Benefit Justification*,” do not provide a substantive, grade-span–specific analysis of this requirement. Instead, the petition relies on generalized and conclusory statements that the school will serve pupils with “unique interest and need” in a “specialized program” and that those pupils will benefit from the services offered, without defining the population, describing the educational challenges faced, or explaining how the proposed services are designed to address those challenges (Petition at pp. 20–21).

Accordingly, the determination under this requirement must be based on a review of the petition as a whole. Based on that review, an educational benefit can be affirmed for high school pupils, but not for middle school or elementary pupils.

**Threshold Met for High School Program: Yes**

Although the Countywide Benefit Justification section relies on vague language regarding “unique” pupils and a “specialized program” (Petition at pp. 20–21), other sections of the petition clearly identify and describe the high school pupil population to be served. The educational program for grades 9–12 is expressly focused on at-risk and credit-deficient students who are not on track to graduate and who have struggled in traditional comprehensive high school settings. The Petition describes specific program elements—such as flexible pacing, individualized learning plans, credit recovery, alternative accountability measures, and multiple high school completion pathways—that are directly aligned to the needs of this population.

Based on these program descriptions and supporting elements contained elsewhere in the petition, the County Board can reasonably conclude that the proposed educational services will benefit high school pupils. Accordingly, the threshold finding is met for the high school program.

**Threshold Met for Middle School Program: No**

The Petition does not sufficiently explain how the proposed educational services will serve the middle school pupil population and how that population will benefit from those services. While grades 6–8 are included in enrollment projections and curriculum descriptions, the petition’s discussion of need and benefit remains grounded in high school–specific conditions and outcomes, including credit deficiency, graduation risk, and high school completion pathways (Petition at pp. 20–23), which do not all apply to middle school pupils.

The Petition does not identify a distinct middle school pupil population with unmet educational needs, nor does it explain how the proposed independent study model is uniquely designed to benefit middle school pupils in a manner that differs from locally operated instructional programs. General references to students being below grade level or benefiting from personalization are insufficient, standing alone, to establish the required benefit finding. Accordingly, the threshold finding has not been met for grades 6–8.

**Threshold Met for Elementary School Program: No**

The Petition does not sufficiently explain how the TK-5 pupil population will benefit from the proposed educational services. Although the Petition includes TK–5 grades within its proposed enrollment and curriculum framework, it does not identify an elementary pupil population with specific educational challenges or unmet needs that would be addressed by the proposed program. Pages 20–23 of the Petition do not articulate any elementary-specific educational benefit and instead rely on generalized statements applicable to all students (Petition at pp. 20–21).

The Petition further does not explain how elementary pupils, including those seeking a homeschool or independent study option, would derive a particular educational benefit from the proposed services beyond general preference, flexibility, or choice. As a result, the threshold finding has not been met for grades TK–5.

**B. Students Cannot be Served as Well within a District**

**High School Program: Not Met**

**Middle School Program: Not Met**

**Elementary School Program: Not Met**



Education Code section 47605.6(a)(1) further requires the County Board to find that the pupil population proposed to be served by the Charter School cannot be served as well by a charter school that operates in only one school district in the county. Pages 20–23 of the Petition, titled “*Countywide Benefit Justification*,” does not provide a distinctive, pupil-centered justification for this requirement. Instead, the Petition relies primarily on generalized assertions regarding operational efficiency, centralized oversight, administrative consistency, and the convenience of operating under a single charter (Petition at pp. 20–23).

While the Petition asserts that countywide authorization will promote equity, access, and continuity for students, these assertions are not supported by evidence demonstrating that district-level charter authorization is inadequate to serve the proposed pupil populations. For example, the Petition does not demonstrate that students are being denied access to educational services, experiencing educational harm, or failing to persist or complete their education due to district boundaries.

Notwithstanding, Petitioners are proposing to operate a TK-12 countywide charter school. Accordingly, the determination under this requirement must be based on the proposed educational program as a whole in light of the current programs offered by the County and within school district boundaries. Based on that review, the petition does not demonstrate that the Charter School can serve students better as a countywide charter school than as a district-authorized charter school.

#### **Threshold Met for High School Program: No**

The Petition does not demonstrate that the high school pupil population cannot be served as well by a charter school operating in only one school district. Although the Petition asserts that countywide authorization is necessary to support student mobility and continuity of instruction (Petition at pp. 21–22), it does not provide evidence that high school students are withdrawing, dropping out, or losing educational opportunity as a result of transiency across district boundaries.

To the contrary, the Petition recognizes that it’s already offering the educational program to the proposed student population through district-specific charter schools authorized by the County Board on appeal, and that those schools have operated effectively under the current authorization structure. The Petition’s own outcome data reflect strong four- and five-year graduation rates and student persistence, which do not support a conclusion that district boundaries are causing educational harm or interruption.

In addition, the Petition describes a programmatic intent to transition some students back to their district of residence, indicating that locally operated systems are functioning partners within the school’s educational model rather than barriers to service. Accordingly, the Petition does not establish that countywide authorization is necessary to serve high school pupils better than a charter school only authorized to

operate within the boundaries of a district.

**Threshold Met for Middle School Program: No**

The Petition does not demonstrate that middle school pupils cannot be served as well by a charter school operating in only one school district. The Petition does not identify any middle school–specific educational harm attributable to district boundaries, nor do they explain how, apart from mobility within the programs throughout the county, a countywide authorization would improve educational outcomes for grades 6–8 compared to local district-bound programs.

The Petition does not present evidence that middle school pupils experience enrollment disruption, loss of instructional continuity, or reduced access to services due to district boundaries. Nor does it explain why district-bound instructional programs are unable to serve middle school pupils effectively. General assertions regarding efficiency, consistency, or access do not satisfy the statutory requirement. Accordingly, the threshold finding has not been met for grades 6–8.

**Threshold Met for Elementary School Program: No**

The Petition does not demonstrate that TK–5 pupils cannot be served as well by a charter school operating in only one school district. Petition pages 20–23 do not articulate any elementary-specific justification for countywide authorization and do not identify educational harm, access barriers, or service limitations caused by district boundaries (Petition at pp. 20–23).

The Petition does not demonstrate that elementary pupils seeking an independent study or homeschool option are unable to access appropriate educational services through locally authorized programs. Nor does it establish that countywide authorization is necessary to provide continuity, equity, or educational benefit for elementary-grade pupils. As a result, the Petition does not meet the countywide necessity requirement for grades TK–5.

**C. Sound Educational Practice**  
**High School Program: Met**  
**Middle School Program: Not Met**  
**Elementary School Program: Not Met**

Education Code section 47605.6 (b) requires the chartering authority to be satisfied that granting the proposed charter is consistent with sound educational practice. Petition pages 20–23 of the petition, titled “*Countywide Benefit Justification*,” do not meaningfully address this requirement from an educational perspective. Instead, that section focuses primarily on operational considerations such as centralized oversight, administrative efficiency, consistency of policies, and the convenience of operating under a single countywide charter, without analyzing whether the proposed countywide

TK–12 configuration is educationally appropriate or coherent across grade spans.

Accordingly, the determination regarding sound educational practice is based on a review of the Petition as a whole. Based on that review, the Review Team is satisfied that the educational program proposed for high school pupils reflects sound educational practice. However, the record does not support a finding that the proposed countywide program, as configured, reflects sound educational practice for middle school or elementary pupils.

**Threshold Met for High School Program: Yes**

Based on a review of the Petition in its entirety, the Review Team is satisfied that the educational program proposed for high school pupils reflects sound educational practice. While the Petition’s “Countywide Benefit Justification” section (pages 20–23) does not independently analyze educational soundness, other sections of the Petition describe a clearly articulated alternative high school program designed to serve at-risk and credit-deficient students who have not been successful in traditional comprehensive high school settings. The Petition describes program components such as flexible pacing, individualized learning plans, credit recovery, alternative accountability measures, and multiple high school completion pathways, which are educationally aligned to the needs of this pupil population.

The coherence between the identified high school pupil population, the instructional model, and the documented outcomes supports the conclusion that the high school program is educationally sound.

**Threshold Met for Middle School Program: No**

The Petition does not support a finding that the Charter School proposes a sound educational practice for middle school pupils. Pages 20–23 do not present a particularized educational rationale for offering the program on a countywide basis for grades 6–8, nor do they analyze the developmental or instructional appropriateness of applying a secondary-oriented alternative education model to middle school students.

Although the Petition includes middle school grades within its current operations, it does not present clear evidence that the educational rationale, outcomes, or program design for middle school pupils independently support countywide authorization or expansion. The Petition’s discussion of program need and effectiveness remains grounded in high school–specific conditions and outcomes, such as credit deficiency and graduation pathways, which do not apply to middle school pupils. As a result, the Board is not satisfied that the proposed countywide configuration represents sound educational practice for grades 6–8.

### **Threshold Met for Elementary School Program: No**

The Petition does not support a finding that the Charter School reflects sound educational practice for elementary pupils. Pages 20–23 do not identify any elementary-specific educational challenges, developmental considerations, or instructional rationale that would support inclusion of TK–5 grades within a countywide alternative education model. Instead, the Petition relies on generalized statements regarding consistency, efficiency, and access that are not specifically tied to elementary educational practice.

While the Petition includes TK–5 grades within its proposed enrollment and curriculum framework, it does not demonstrate that the proposed instructional design is developmentally appropriate for early learners or that it reflects a purpose-built elementary educational model. The absence of elementary-specific program rationale, outcomes, and instructional coherence prevents the Review Team from being satisfied that the proposed countywide TK–12 charter, as configured, represents sound educational practice for TK–5 pupils.

### **D. Reasonable Justification for the Inability to be Established by a Local District Threshold Met: No**

The findings regarding countywide necessity and sound educational practice also inform the determination under Education Code section 47605.6(b) that the Petition does not include reasonable justification for why the charter school could not be established by petition to a school district. The Petition states that if the Petitioner were to seek authorization from multiple school districts throughout the County, then the program would likely be inconsistent amongst charter schools because each charter school would be subject to individual school district’s policies and memorandum. (Petition, p. 20-21.) But, the record reflects that the Petitioner has successfully established and operated district-bounded charter schools within the County, including schools authorized on appeal, and that those schools have functioned effectively under the existing authorization structure.

Petitioner also justifies a countywide charter petition by stating that charter schools authorized by individual school districts must give preference to students residing within district boundaries. (Petition, p. 21). However, this is a slight mischaracterization of the enrollment preference requirements. The law requires that in the event of a lottery (i.e. more students apply for enrollment than spots available) then a charter school shall give preference to those residing in the territory of the authorizer. (Ed. Code § 47605.6(e)(2)(B).) Notwithstanding, a charter school must enroll all students who wish to attend regardless of location. (Ed. Code § 47605.6(e)(2)(A).) Moreover, while it’s likely true that having a resource center in the community in which the student resides benefits the student’s education, the Charter School glosses over the fact in its justification that it operates a nonclassroom-based, primarily independent study

program, not a seat-based program that demands in-person mandatory attendance.

Overall, the Petition does not identify new or changed circumstances that would prevent continued or expanded operation through district-level charter petitions. Instead, the petition's justification for countywide authorization is grounded primarily in operational efficiency and administrative preference, which do not constitute reasonable justification under the statute (Petition pp. 20–23).

## **2. The Petition Lacks a Reasonably Comprehensive Description of Each of the Required Elements.**

### **a. Element A: Educational Program.**

The Petition lacks a fully comprehensive description of the elementary program and is largely focused on the needs of students in grade 6 and above. For example, the petition includes a sample scope and sequence for 8<sup>th</sup> and 10<sup>th</sup> graders, and course catalog descriptions for grades 6–12. (Petition, Appendix X.) Additionally, while the Petition identifies the course titles for common core subjects for elementary grades, the Petition is much more descriptive and focused on the needs of secondary students. In sum, the Petition lacks the level of detail expected in a comprehensive description of an elementary program.

#### ***TK-5 Program Coherence.***

The Petition describes an intervention-focused, dropout-recovery independent study program and references the petitioners' operation of two grades 6–12 schools authorized by the County Board, which are described as “model[s] of academic and operational excellence.” The Petition further identifies its target students as “students who are academically at a high risk or in need of a non-traditional academic environment” and states that “the school's efforts will focus on helping students to become re-engaged” (Petition, p. 25). In addition, the Petition notes that a majority of AVCS students enroll with significant credit deficiencies and subsequently find success (Petition, p. 10).

However, the proposal would serve a full TK–12 grade span, and the Petition provides limited detail regarding how the program model will be adapted to address the distinct developmental and instructional needs of students in TK–5. Overall, the program description appears to extend key elements of a 6–12 independent study/credit-recovery design to the elementary grades without providing an implementation-level description of TK–5 structures, supports, and instructional design appropriate to early learning (Petition, pp. 26–27). This gap is reflected not only in instructional design, but also in descriptions of supports for students with disabilities, English Learners, staffing, and the system of support (including MTSS and targeted interventions) necessary to ensure student growth in an independent study context (Petition, p. 59; pp. 1009–1016).

- *Instructional Model Articulation.* The Petition’s description of the educational program does not clearly articulate or differentiate among the instructional models it appears to propose. Across sections, the program is described in ways that require reviewers to infer the intended modalities, such as: (1) a home-based (homeschool-like) approach, (2) a fully virtual model, and (3) a hybrid model (Petition, pp. 25–27). However, these modalities are not defined, disambiguated, or presented as a coherent set of options with clear boundaries and distinct supports aligned to each model.

As a result, the Petition does not provide a comprehensive, implementation-level explanation of what students and families should expect in practice, including: the primary mode of instruction; the required frequency, duration, and format of teacher–student contact; the intended balance of synchronous versus asynchronous learning; the role and expectations of parents or learning coaches; expectations for on-campus participation (if any); and how instruction, staffing, and student supports shift by grade span. This lack of specificity limits oversight’s ability to evaluate feasibility and implementation fidelity and leaves community members and prospective families without a clear understanding of the day-to-day instructional experience.

In addition, although the Petition indicates TK–3 enrollment will be delayed, it does not specify what program design, staffing, or service delivery the oversight team should expect in the inaugural year (e.g., which grades will be served, under which instructional model(s), and with what corresponding supports).

- *Gradespan Articulation* The Petition does not sufficiently develop or differentiate the educational program across the elementary (TK–5), middle (6–8), and high school (9–12) grade spans. While the Petition identifies its intentions to serve grade ranges, it does not articulate how developmental needs of the different grade levels will be served through the gradespan and the design to overcome such demands—for example, the petitioners have former focus on middle and high schools serve students who will largely have acquired the reading fluency to enable academic learning, however this new expansion to early learning and TK engage a new and critical dimension of learning need, the acquisition of reading. Reading skills are developed in foundational years that precede state testing and early literacy acquisition and foundational skill development in TK–5 versus credit-bearing, course-based progression and credit recovery needs at the secondary level.

As written, the program description reads as though a secondary (6–12) design has been extended downward to TK without specifying the elementary-specific structures and supports that would be required for developmentally appropriate implementation. This lack of grade-span specificity limits oversight’s ability to evaluate feasibility and implementation readiness, and it leaves families without a clear understanding of what the day-to-day learning experience will look like at each grade level.

- *Acquisition of Reading.* The Petition presents a program that assumes students enter with preexisting reading skills, as reflected in the grade three curriculum sample

(p.1177). However, students enrolling prior to third grade must first acquire foundational reading skills and develop fluency in order to progress through subsequent grade levels. It is not clear that the petitioners have the experience or capacity to deliver an independent study model that effectively supports reading acquisition and subsequent fluency development for students in elementary or early-grade spans. No corresponding distinction is documented within the MTSS model, and this need is not addressed elsewhere in the petition. As a result, the proposed model may inadvertently discourage enrollment of students with delayed reading acquisition and fluency, and the petition does not articulate any program element designed to support students in this circumstance. Additionally, the petition does not acknowledge or include a plan for implementing a state-approved reading screener as required by Education Code section 53008. Failing to acknowledge this requirement calls into question whether the assessment will be implemented. If not, it has the potential to cause harm to students because those with reading difficulties, such as dyslexia, will not be identified at the earliest stage of their education.

- *Multi-Tiered Systems of Support.* The Petition outlines a consolidated Multi-Tiered System of Support (MTSS) intended for all learners, including those who are academically low achieving, with targeted intervention (Petition p. 1009). However, the Petition does not comprehensively articulate how MTSS will be differentiated across the elementary, middle, and high school levels, or across key need factors such as multilingual learners, students with disabilities, and other student groups (Petition pp. 1009-1016). Overall, the Petition's MTSS description lacks necessary operational details, including entry and exit criteria, progress monitoring expectations, and exemplar documents that would demonstrate viability. As written, it remains unclear how elementary students' needs will be fully met within the proposed MTSS model.

- *Lack of Articulated Purpose.* The Petition does not clearly or comprehensively articulate the purpose or need for the proposed charter school, nor does it fully identify the students it intends to serve. The Petition states generally that the school will serve students who are "academically at-risk or in need of a non-traditional academic environment" (Petition, p. 25). However, it does not substantiate this claim with a coherent description of community need, particularly at the elementary (TK–5) level, or explain what specific unmet need the proposed program is designed to address for elementary students.

As discussed elsewhere, the Petition's program description reads as though a secondary (6–12) independent study/credit recovery model is being extended downward to the elementary grades without sufficient adaptation. The Petition does not identify the distinct student needs it aims to address in TK–5, nor does it explain how a model oriented toward credit recovery and credit deficiency is designed to meet the needs of students who are not credit deficient because they are in the middle or elementary grades acquiring foundational skills, including literacy and numeracy.

- *Insufficient English Learner Program.* The Petition does not present a comprehensive plan or clearly articulated support for English Learners in the TK–5 grade span. Based on

the current language of the Petition, it is unclear how the Charter School will adequately meet the needs of this student population at the elementary level.

- *TK–5 English Learner Elementary Level Support.* Discussion of TK–5 English Learner elementary level support is limited and largely confined to a single paragraph under the heading, “Altus Kids TK–5 Homeschool.” That paragraph briefly acknowledges English Learners and frames support primarily as assistance to parents/guardians in their role as learning coaches (i.e., “teachers support parents/guardians as learning coaches”), with additional daily support described as available for grades 4–5 (Petition, p. 14). Beyond this brief statement—and the general EL descriptions elsewhere in the Petition (pp. 61–65). The Petition does not explain what EL services will look like in practice across TK–5, including how support will be delivered, how often students will receive direct services, how services will vary by grade and proficiency level, or how the program type will ensure access to grade-level instruction while students develop English proficiency.
- *Annual Goals and Metrics.* The annual goals and metrics stated in the Petition lack differentiation by grade level. The Petition does not adequately describe how local assessments will be used, including the specific plan or means by which results will inform instructional adjustments and support in the elementary grades.

**b. Element E: Governance Structure.**

The Petition addresses governance requirements but contains deficiencies related to governing board meeting practices and board training.

**i. Board Meetings**

The Charter Petition affirms that they will comply with Education Code section 47604.1(c)(3) that requires a governing board of an entity managing one or more charter schools in the same county to meet within the physical boundaries of the county where the charter schools are located. We note based on a review of the board meeting agendas of charter schools operated by Altus Schools Southern California, including those charter schools authorized by RCBE, that the governing body meets at various remote locations the majority of which are not within Riverside County. While the Brown Act allows for teleconferencing (Gov. Code § 54953(b)), Altus School Southern California will more likely be able to satisfy Education Code section 47604.1(c)(4) which allows a governing body of an entity managing two or more charter schools in different counties to meet in the boundaries of the county which has the greatest number of pupils.

**ii. Board Training**

The Charter Petition states that the Board of Directors receives AB 2158 ethics training which includes topics that cover ethics, fiduciary duties, the Brown Act and conflict of interest laws (page 107). However, the Charter Petition does not specifically identify the school finance training required by AB 640. A board member’s fiduciary duty is



distinguishable from their understanding of school finance. This school finance training requirement goes into effect during the proposed charter term. Effective January 1, 2026, AB 640 requires all governing board members of charter school in office as of April 1, 2027, to complete training before April 1, 2028. Board members who take office on or after April 1, 2027, must complete the required training within one year of initial appointment. (Ed. Code § .35220 et seq.)

### **3. The Petition Presents an Unsound Educational Program for Students to be Educated.**

1. The educational program proposed in the Petition is unsound for middle school and elementary pupils because it is not coherent, developmentally appropriate, or adequately designed to support student learning across the full TK–12 grade span. While the Petition describes an intervention-focused, dropout-focused independent study and credit-recovery program that is reasonably aligned with the needs of high school students, particularly those who are credit deficient or disengaged from traditional school settings (Petition, pp. 10, 25), that same program model is extended to middle and elementary grades without sufficient adaptation to address foundational learning, instructional delivery, or age-appropriate supports. As a result, the Petition does not demonstrate that the proposed educational program, as configured, can effectively serve students in grades TK–8.

The educational program is largely designed around secondary instruction, as reflected in the detailed course catalog descriptions for grades 6–12 and the inclusion of sample scope and sequence documents for grades 8 and 10, with comparatively limited development of the elementary program (Petition, Appendix X). Although the Petition identifies course titles for elementary grades, it does not provide an implementation-level description of curriculum design, instructional strategies, or learning progression appropriate for TK–5 students. The program description assumes a level of student independence and readiness for course-based progression that may be appropriate for older students but is not developmentally appropriate for elementary or early middle school students, and the Petition does not explain how instruction will be structured or scaffolded to support younger learners in an independent study setting.

In particular, the educational program does not adequately address foundational literacy development for students enrolling prior to grade three. The grade three curriculum sample reflects an assumption that students enter with established reading skills, and the Petition does not describe how reading acquisition, fluency development, or literacy intervention will be delivered, monitored, or intensified for students in TK–2 (Petition, p. 1177). This omission undermines the program’s ability to support student progression through subsequent grade levels and raises concerns regarding its capacity to serve early learners effectively.

The Petition also lacks clarity regarding instructional delivery, as it references multiple instructional modalities—including home-based, virtual, and hybrid approaches—without clearly defining those models or explaining how instruction, teacher–student interaction, and student supports will function within each model or vary by grade span (Petition, pp.

25–27). As written, the educational program does not clearly communicate what students and families should expect in practice, particularly for grades TK–8.

Additionally, the Petition does not sufficiently articulate how the educational program will be differentiated across elementary, middle, and high school grade spans. The program description reads as though a secondary independent study and credit-recovery model has been extended downward to younger grades without the elementary- and middle-school-specific instructional structures and supports necessary for sound implementation. The Petition further does not adequately explain how its Multi-Tiered System of Support will be implemented for elementary and middle school students, as it lacks defined entry and exit criteria, progress monitoring expectations, and grade-appropriate intervention strategies (Petition, pp. 1009–1016).

Finally, the educational program does not present a comprehensive or clearly articulated plan for serving English Learners in the elementary grades. Discussion of TK–5 English Learner support is limited and does not explain how direct instructional services will be delivered, how frequently students will receive such services, or how instruction will be differentiated by grade level and English proficiency (Petition, p. 14; pp. 61–65).

Taken together, these deficiencies are substantive and reflect potential structural weaknesses in the proposed educational program, not merely a lack of descriptive detail. While the educational program proposed for high school pupils is sound, the proposed middle school and elementary programs lack the foundational instructional design, grade-span differentiation, and support systems necessary to ensure a coherent and effective educational experience. Accordingly, the Petition does not demonstrate that the proposed countywide TK–12 charter school offers a sound educational program for all grade levels it proposes to serve.

2. The Petition fails to acknowledge California law requiring all local education agencies, which includes charter schools, to administer a state-approved reading screener for students in grades K–2 beginning no later than the 2025–26 school year. Only specific screeners approved by the California Department of Education may be used. The Petition makes no reference to this mandate and provides no evidence that the school is aware of or prepared to implement one of the approved instruments. The screening is supposed to be considered part of the school’s “comprehensive instructional strategy” (Education Code section 53008). The absence of any plan to comply represents an incomplete and unsound education plan. Failing to acknowledge this requirement calls into question whether the assessment will be implemented. If not, it has the potential to cause harm to students because those with reading difficulties, such as dyslexia, will not be identified at the earliest stage of their education.

## **RECOMMENDATION**

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

- DENY the Petition and adopt, as findings of fact, the Proposed Findings identified in the Staff Report, concluding the Countywide Petition did not meet the requirements of Education Code Section 47605.6.
- Grant the Countywide Petition, based on the Board's affirmative findings required by Education Code Section 47605.6, and its determination that no statutory basis for denial exists, for a 5-year term, commencing July 1, 2026, and concluding June 30, 2031, provided that the a Memorandum of Understanding between the Charter School and RCOE is signed prior to the date of commencement of the new term.