

New Charter Application Evaluation Report 2022-23

Global Leadership Academy International Charter High School (Resubmitted April 6, 2023)

REPORT PURPOSE

The Charter Schools Office (“CSO”) of The School District of Philadelphia (“District”), on behalf of the Board of Education, received a resubmitted and revised Application (“Revised Application”) for Global Leadership Academy International Charter High School (“GLAICHHS” or “Charter School”) on April 6, 2023. The Board of Education denied the original Application (“Original Application”) for GLAICHHS on February 23, 2023 by Action Item No. 21 and issued an adjudication in support of the denial. The Revised Application has been reviewed by a team of evaluators led by the CSO and comprised of internal District employees and external reviewers with expertise on the operation of successful charter schools.

This evaluation report is limited to an evaluation of whether the Revised Application adequately responds to the 2022-23 application instructions and questions as well as certain aspects of the Charter School Law. This evaluation report is not intended to be a complete legal review of the Revised Application under the Charter School Law. The Board of Education, by action at a public meeting, will decide whether to approve or deny the Revised Application for a new charter school.

Broadly, new charter school applications, including the Revised Application, are evaluated on the following criteria:

- The extent to which the application considers the information requested in Section 1719-A of the Charter School Law and conforms to the legislative intent;
- The capabilities of the Applicant, in terms of support and planning, to provide comprehensive learning experiences to students;
- The demonstrated, sustainable support for the charter school plan by teachers, parents, community members, and students; and
- The extent to which the charter school may serve as a model for other public schools.

PROPOSED CHARTER SCHOOL INFORMATION

Charter School Name	Global Leadership Academy International Charter High School
Mission Focus, Model, or Type	GLAICHHS uses a hands-on learning approach in the classroom and takes scholars into the city and into the world to equip them with the real-life currencies they need to succeed in future education and careers.
Proposed Address	5210-18 North Broad Street Philadelphia, PA 19141
Target Community	Not applicable
Geographic Enrollment Preference	Citywide
Proposed School Leader, Current Employer	None listed

PROPOSED GRADE SPAN AND ENROLLMENT

Operating Year	Year 1 23-24	Year 2 24-25	Year 3 25-26	Year 4 26-27	Year 5 27-28	Scale 26-27
Grade Span	9	9-10	9-11	9-12	9-12	9-12
Enrollment	150	300	450	600	600	600

APPLICANT INFORMATION

Application Entity/Team	Global Leadership Academy International Charter High School
Contact Information	Dr. Naomi Johnson-Booker 4601 W. Girard Ave. Philadelphia PA 10131 drbooker@ga-schools.org (267) 664-3800

Mission	<i>Global Leadership Academy International Charter High School’s (“GLAICHHS”) mission is to provide Philadelphia youth with a holistic, purposeful, and empowering secondary education focusing on global competence, real-world learning, and leadership development. GLAICHHS will develop leaders who can innovate, disrupt, create, care for, build, and rebuild their communities, country, and their world.</i>
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APPLICATION SUMMARY

The Applicant, Global Leadership Academy International Charter High School (“GLAICHS”), proposes to open Global Leadership Academy International Charter High School (“GLAICHS” or “Charter School”), a charter high school using a hands-on learning approach in the classroom, and taking scholars into the city and into the world to equip them with the real-life currencies they need to succeed in future education and careers. The proposed Charter School plans to open in SY 2023-24. At scale, the proposed Charter School would serve 600 students in Grades 9 through 12. In the first year of operation, the Applicant proposes to serve Grade 9 with 150 students. The proposed Charter School would be located at 5210-18 North Broad Street Philadelphia, PA 19141.

The new information and clarifications provided in the Revised Application have been noted in this Revised Evaluation Report. In instances where the Revised Application contains no substantive changes compared to the Original Application, evaluation remarks from the Original Evaluation Report have been italicized and incorporated into this report. All citations reference the Revised Application Narrative and Revised Attachments.

EXECUTIVE SUMMARY

The Applicant proposes to establish Global Leadership Academy International Charter High School. Its mission would be “to provide Philadelphia youth with a holistic, purposeful, and empowering secondary education focusing on global competence, real-world learning, and leadership development” (p. 1, Revised Narrative).

The Applicant submits curricular materials for grades and subjects it intends to serve in Year 1. However, the submitted materials do not demonstrate that the proposed Charter School would meet all grade level requirements as required by Chapter 4, Title 22 of the Pennsylvania Code. Specifically, English and Math materials did not include evidence of planned instruction for several standards. Further, the Grade 9 Environmental course is based on standards that include standards from Grade 12 Environmental Science, Grade 10 Physical Science, Grade 10 Technology, and Grade 10 Earth Science. The Application did not include specific curricular materials for Arts & Humanities.

The founding coalition of the Applicant is comprised primarily of current and former directors, staff, and stakeholders from Global Academies, Global Leadership Academy Charter School (“GLACS”), and Global Leadership Academy Southwest at Huey (“GLASW”). The Applicant states that the Application “is built upon the desire of scholars currently attending GLACS and GLASW, and their families, to continue their school career in the same global educational program” (p. 72, Revised Narrative). Both GLACS and GLASW have historically had mixed outcomes in relation to the Charter School Performance Framework, which includes three domains: Academic Success, Organizational Compliance & Viability, and Financial Health & Sustainability. Both GLACS and GLASW are operating under current and signed charter agreements.

The Applicant objects to the CSO examining outcomes from GLACS and GLASW in the review of the proposed Charter School, but it also asks the evaluators to consider the experience of the founding coalition in leading these same schools. Although the Applicant does not present itself as an existing operator, this report includes the section evaluating applications from existing operators of charter schools. The rationale for evaluating GLAICHS in the context of what it calls “its sister schools” (p. 71, Revised Narrative) is that the proposed Charter School shares significant and fundamental features in common with GLACS and GLASW, including: the name featuring “Global Leadership Academy”; the reliance on “the Global Leadership Academy model already employed at GLACS and GLASW so that high school scholars may continue to benefit from its most successful components” (p. 5, Revised Narrative); the founding coalition’s representatives from GLACS,

GLASW, and Global Academies; the experience of founding coalition’s leader Dr. Naomi Johnson-Booker, who the Applicant describes as having “demonstrated the ability to develop and lead successful schools under challenging circumstance,” specifically referring to GLACS and GLASW (p. 45, Revised Narrative); the proposed enrollment preference for students from GLACS and GLASW; and the plan to access services offered by Global Academies.

The proposed Charter School intends to serve scholars citywide, with a preference for those currently attending GLACS or GLASW. The proposed Charter School would enroll 150 students in Grade 9 in its initial year, and the Revised Application includes eligible intent to enroll forms for 72 potential students, or 48% of the Year 1 seats.

The Applicant plans to contract with third-party service providers for services related to technology, financial management, health, security, and food. While the Applicant itself may not be operating or managing charter schools, it is integrally connected with GLACS and GLASW, and expects to receive services from and have a licensing arrangement with Global Academies. No agreement with Global Academies was submitted; it is not clear which specific services would be provided, under what terms any services would be provided, and at what cost.

There are errors in the assumptions about both revenues and expenditures in the Applicant's budget that will lead to deficit spending in Years 1 through 3.

The building identified to be used by the Applicant was formerly used by Cristo Rey High School and is owned by Our Lady of Hope Parish in conjunction with the Archdiocese of Philadelphia. The facility appears to be suitable for the proposed grades and enrollment. While the facility is in a different neighborhood from GLACS and GLASW, the Applicant notes that the location on North Broad Street is easily accessible by public transportation.

SECTION SUMMARIES

ACADEMIC PROGRAM	
This section details the proposed Charter School's curriculum, key instructional methods, assessment strategies, and student supports.	
STANDARD	FINDINGS
Mission Overview	
MISSION AND VISION	<p>No substantive changes were identified in this area of the Revised Application. The Original Evaluation states:</p> <p><i>The Applicant proposes to establish the proposed Charter School with the mission "to provide Philadelphia youth with a holistic, purposeful, and empowering secondary education focusing on global competence, real-world learning, and leadership development" (p. 1, Revised Narrative). The Applicant elaborates, "GLAICHHS prioritizes the development of academic skills and equally significant 'currencies,' the building blocks of modern day success: credentials, connections, financial security, and competence" (pp. 4-5, Revised Narrative). The Applicant provides a clear and consistent mission throughout the Application.</i></p>
LEGISLATIVE INTENT	<p>No substantive changes were identified in this area of the Revised Application. The Original Evaluation states:</p> <p><i>The Applicant plans to fulfill the legislative intent outlined in the Charter School Law through increasing learning opportunities by "providing a high school option with an international studies education" (p. 5, Revised Narrative). Further, the Applicant claims that it "distinguishes itself within the context of already existing school options due to its tri-part focus on global competence, leadership development, and real-world learning" (p. 5, Revised Narrative). The Applicant recognizes that the tenets of its mission alone are not unique, but rather the uniquely innovative aspect of the proposed charter school is as follows: "GLAICHHS is not unique in its goal of developing youth's global competence, but the school is unique in the way it does this out in the real world – locally, nationally, and internationally – and in its coherent, consistent focus on developing and supporting scholar leadership" (p. 5, Revised Narrative).</i></p>
EVALUATING MISSION IMPLEMENTATION	<p>No substantive changes were identified in this area of the Revised Application. The Original Evaluation states:</p> <p><i>The Applicant did not provide specific details of observable elements that would be indicators of the proposed Charter School meeting its mission.</i></p>
Curriculum and Educational Plan	
EDUCATIONAL PHILOSOPHY	<p>No substantive changes were identified in this area of the Revised Application. The Original Evaluation states:</p> <p><i>The Applicant grounds its educational philosophy in the educational philosophies of John Dewey and Paolo Freire, stating, "True education reflects and builds on what students already know" (p. 6, Revised Narrative). The Applicant elaborates, stating that the proposed Charter School will "[Blend] experiential learning and student agency with the twenty-first century priorities of anti-racist education, multiculturalism, and personal transformation and sustainable development" (p. 6, Revised Narrative).</i></p>

	<p><i>The Applicant elaborates on "the four (4) beliefs that anchor this philosophy: Personal Transformation, Ending Marginalization, Multiple Engagement Opportunities, and Rigorous, Well-Rounded Empowerment Opportunities" (p. 6, Revised Narrative) and students "must develop both academic skills and equally significant "currencies": credentials; connections; financial security; and, competence" (Revised Fact Sheet).</i></p> <p><i>The Applicant outlines the specific instructional techniques it plans to utilize for the implementation of its proposed mission and education philosophy. These include:</i></p> <ul style="list-style-type: none"> • <i>Extended daily time and a flexible, year-round calendar</i> • <i>A curriculum with high-quality texts that reflect diverse cultures and high-interest topics</i> • <i>Preparation and support for post-secondary success</i> • <i>International excursions and global connection activities</i> • <i>Local trips, shadow days, community projects, and internships</i> • <i>Thematic college and career pathways</i> • <i>School-wide restorative practices, and credit-bearing Social Emotional Learning</i> • <i>Asset-based and relationship-based instructional practices</i> • <i>Instruction that leverages technology</i>
<p>PROPOSED CURRICULUM AND RATIONALE (Narrative and Attachment 1)</p>	<p>The Applicant provides numerous updates to the proposed curriculum in the Revised Application. Most notably, the Applicant provided curriculum materials to address a majority of Grade 9 Social Studies Academic Standards. Additional details about the subject matter are outlined below.</p> <p>Though additional curricular materials were provided, the Revised Application still does not include a complete comprehensive set of curricular materials to demonstrate that the proposed Charter School would meet grade level requirements as required by Chapter 4, Title 22 of the Pennsylvania Code. A curriculum must contain tangible resources to include goals, assessments, instructional strategies, expectations, and resources for teaching and learning. The Pennsylvania Code establishes, "A school entity's curriculum shall be designed to provide students with planned instruction needed to attain these academic standards" (Chapter 4.12d).</p> <p>The Applicant states that the curriculum selected "will develop scholars within and out of the school to be leaders who can innovate, disrupt, create, care, build, and rebuild their communities, their country, and their world" (p. 7, Revised Narrative). The Applicant claims that the proposed Charter School's "academic program satisfies all other graduation requirements, with one year of Health and Physical Education, address of family and consumer science standards including Financial Literacy, multiple courses in the arts and humanities, and substantive, credit-bearing courses and experiences in career education and work" (p. 7, Revised Narrative).</p> <p>The submitted materials for core subject areas did not demonstrate a full alignment with the Pennsylvania Core and Academic Standards. The Applicant's curriculum submission presented the following deficiencies:</p> <p>English: The Applicant's submission was partially aligned to the Grade 9-10 English Language Arts (ELA) PA Core Standards. Definitive standards (along with coding), anchors, eligible content, and alternate standards were not included. The English Overview stated that the American Reading Company's CORE Curriculum would be used for grades 9 and 10.</p>

	<p>The English 1 Scope and Sequence included four units with the following: titles, brief descriptions, a timeframe, PA academic standards, essential questions, learning objectives, assessments, activity samples, resource samples, strategies for diverse learners, and enrichment for gifted and talented learners. Although learning objectives were stated, evidence-based instructional strategies beyond performance task listings were not included.</p> <p>The resubmitted English curriculum materials were missing evidence of planned instruction for the following standards: CC.1.3.9-10.A, CC.1.3.9-10.D, CC.1.3.9-10.F, CC.1.3.9-10.G, CC.1.4.9-10.X, and CC.1.5.9-10.G. The following standards are included in the planned curriculum; however, they are not recognized standards: CC.1.3.9-10.L, 11.4.9.C, and 11.4.9.E.</p> <p>Mathematics: The Applicant states that Grades 9 through 12 will use Agile Mind's Comprehensive mathematics curriculum. These curricular materials include: professional support, detailed lesson plans, high-yield instructional assessments and differentiated strategies. The Applicant states that its mathematics experts aligned Agile Mind's 9th grade common core curriculum with PA Core standards and a cross walk will be done for Grades 10 through 12 as well. No materials were provided for any course or grade other than Intensified Algebra I Part A - 9th Grade. A list of aligned standards is provided on a Standards Map for Grades 9–12, but this is not enough to review the Math curriculum for effectiveness. The submitted Math curriculum materials were missing evidence of planned instruction for the following standards: CC.2.2.8.B.3, CC.2.2.8.C.1, CC.2.2.8.C.2, CC.2.2.HS.D.6, CC.2.4.7.B.3, CC.2.4.8.B.1, CC.2.4.HS.B.4, CC.2.4.HS.B.5, CC.2.4.HS.B.7</p> <p>All Keystone Exam aligned Eligible Content standards remain missing from the revised Grade 9 Algebra I curriculum materials.</p> <p>The Applicant describes the following math sequence: Course Sequence (high achieving student): Intensified Algebra Part B: 9th Grade Geometry: Grade 10 Algebra II: Grade 11 Algebra III/Trigonometry - Possible AP Calculus and/or Dual Enrollment: Grade 12</p> <p>Course Sequence (all other students): Intensified Algebra Part A: 9th Grade Intensified Algebra Part B: 10th Grade Geometry: 11th Grade Algebra II: 12 Grade</p> <p>While the sequence of courses is listed and described within the overview document, there were no materials provided to review courses beyond Intensified Algebra Part A & B.</p> <p>Science: The Grade 9 Environmental course is based on standards that include standards from Grade 12 Environmental Science, Grade 10 Physical Science, Grade 10 Technology, and Grade 10 Earth Science. The Grade 10 Environmental Science standards are entirely missing.</p>
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	<p>The resources utilized in the Environmental Science courses include Environmental Science (2013) and Holt Environmental Science Labs at www.HMDScience.com. All grade-level appropriate standards should be addressed.</p> <p>Curricula for Biology, Physical Science, and Chemistry were not submitted. It is unclear if the Grade 11 Physical Science course is actually Physics or Physical Science. There was not a curriculum that addressed the Physics standards for either Grade 10 and Grade 12 Physics standards.</p> <p>The Revised Application did not include additional materials or curriculum adjustments for Science.</p> <p>Social Studies: Curricular materials for Grade 9 World Geography & Cultures were submitted. The submitted Social Studies curriculum materials were missing evidence of planned instruction for the following standards: 5.3.9.I, 6.2.9.E, 6.2.9.F, 7.4.9.B, 8.3.9.A, 8.3.9.B</p> <p>Physical Education (PE): Based on the submitted PE and Health Grade 9-12 overview document, the proposed Charter School would offer Health and PE to students during Grade 9. The resource that the proposed Charter School plans to utilize to address the PE standards is Fitness Gram program. As indicated by the Summary, the majority of the PA standards were addressed in the submitted curriculum. Only 10.1.9.B and 10.2.9A were missing from the curriculum. A Grade 12 Health & PE curriculum was not submitted.</p> <p>The Revised Application did not include additional materials or curriculum adjustments for Physical Education.</p> <p>Arts and Humanities: The Revised Application did not include additional materials or curriculum adjustments for Arts and Humanities. The Electives overview mentioned that elements of Arts and Humanities are included in a Grade 9 elective rotation, but there is limited evidence of this in the Scope and Sequence documents for the Leadership and Seminar/Advisory curricular materials.</p>
STAFFING MODEL	<p>No substantive changes were identified in this area of the Revised Application. The Original Evaluation states:</p> <p><i>The Applicant presents a cohesive staffing model plan for the proposed Charter School. The staffing model includes 32 unique staff positions for instructional, support, and non-instructional staff. As part of Revised Attachment 8, the Applicant presents organizational charts for Years 1 through 5 that demonstrate an adequate reporting structure for staff, including contracted staff and the Board of Trustees for the proposed Charter School.</i></p>
SCHOOL CALENDAR (Narrative and Attachment 2)	<p>The Revised Application and submitted school calendar (Revised Attachment 2) for the proposed Charter School appears to be compliant with Section 1715-A-9 of the Charter School Law. Revised Attachment 2 is a proposed school calendar for school year 2023-24. The calendar details start and end dates, planned early dismissal days for professional development, observed holidays, and breaks.</p> <p>The proposed Charter School anticipates a start date of August 1, 2023 for staff and August 21, 2023 for students. The Applicant proposes a start time of 8:20AM for students. With the exception of Wednesdays, the Applicant proposes a dismissal time of</p>

	3:31PM for students and 2:50PM for staff. On Wednesdays, the Applicant proposes a student dismissal of 1:10PM in order to provide professional development to staff “and for scholars to participate in internships and local excursions” (p. 14, Revised Narrative).
ACADEMIC DATA AND GOALS (Narrative and Attachment 3)	<p>Minor changes were identified in this section of the Revised Application for the proposed Charter School. The Applicant includes the use of practice college-readiness exams (PSAT and PreACT) in the assessment plan for students in Grades 9 and 10.</p> <p>The Original Evaluation states:</p> <p><i>The Applicant provides the following goals:</i></p> <ol style="list-style-type: none"> 1. <i>Academic performance: All scholars will have the academic skills in math, reading, and writing they need to succeed in school, in post-secondary programs, and in the workforce.</i> 2. <i>Substantial, ongoing academic growth: All GLAICHS scholars will demonstrate consistent annual gains in core academic subjects.</i> 3. <i>Futures-focused leadership: All GLAICHS scholars will be college- and career-ready through the development and practice of futures-focused leadership skills.</i> 4. <i>Global competence: All GLAICHS scholars will become global citizens through international excursions. (pp. 14-15, Revised Narrative)</i> <p><i>The Applicant provides numerous data sources aligned to each goal, such as: Keystone exam data, classroom-based assessment data, benchmark exams, AIMSweb, ACT, PSAT, SAT, graduation rate, and PISA global competence survey. The goals are attainable with interim progress subgoals.</i></p>
NON-ACADEMIC DATA AND GOALS (Narrative and Attachment 3)	<p>The Revised Application for the proposed Charter School includes significant revisions to the non-academic goals section in the Original Application, including removing references to GLACS and GLASW.</p> <p>The Applicant proposes non-academic goals related to the following areas: attendance, chronic absenteeism, discipline, college acceptance rate, graduation rates, and first fall college matriculation. These goals are rigorous and include an overview of supports that the proposed Charter School plans to incorporate to meet the goals.</p> <p>Regarding attendance, the Applicant states an initial Year 1 goal that 74 percent of students will achieve 95 percent or higher attendance. Each year, the goal increases by two percent to ultimately reach a Year 5 goal that 82 percent of all students achieve at least 95 percent or higher days' attendance. According to high school comparison data provided in 2021-22 Annual Charter Evaluation (“ACE”) reports, during SY 2020-21, which was conducted virtually due to the pandemic, District high schools averaged 63 percent of students attending 95 percent of days or more. The following year with the return to in-person learning, Open Data from the District Performance Office shows that in SY 2021-22 only 34 percent of District high school students achieved 95 percent or higher days' attendance. The Applicant provides a list of multiple interventions and systems that will be utilized to increase regular student attendance such as, “home visits and connections with community partners...SAP team referrals...using intrinsic and extrinsic rewards and recognition through SWPBIS” (p. 16, Resubmitted Narrative).</p> <p>The Applicant establishes a high goal for student post-secondary acceptance rate and first fall matriculation, and provides a more thorough plan as to how it will achieve these goals. A goal for 95 percent of scholars to be accepted to one or more post-secondary programs by Year 4 is attainable with the supports outlined in the Revised Narrative. The Applicant</p>

	<p>outlines a structure of support to meet the goal of 60% for first fall matriculation statistics. These newly identified supports include "both formal (panels, list-serves, posted workshops and scholarship opportunities) and informal (social media recognition, social events and activities) activities and systems which help alumni continue to succeed" (p. 17, Revised Narrative).</p> <p>The Applicant identifies a school-wide data collection and review process (Teacher Initiated Problem-Solving, TIPS) in order to address trends based on behavior data. This process is intended to address individual student needs as well as identify staff who need additional support in implementing school-wide behavior interventions. It continues to be unclear how the Applicant derived its reference point for District suspension data for high school students when creating a suspension goal for the proposed Charter School. "At the District level, the suspension rate for scholars in grades nine through twelve is thirty-eight percent; at some local charter schools, this rate is even higher" (p. 16, Revised Narrative). ACE report data from SY 2018-19 actually demonstrates an average of 10 percent of District students in Grades 9 through 12 receiving a suspension. More recent data demonstrates a fluctuation in suspension rates due to virtual instruction during the COVID-19 pandemic.</p>
<p>ASSESSMENTS <i>(Narrative and Attachment 3)</i></p>	<p>The Revised Application for the proposed Charter School includes significant revisions to the assessments section of the Original Application. The Applicant removed reference to "professional review" (p. 18, Original Narrative) for teachers failing more than thirty percent of a class and replaced it with the consistent message that, "Leaders recognize that this teacher needs extra support including intensive mentoring and targeted professional development" (p. 18, Revised Narrative).</p> <p>The Applicant proposes to utilize numerous normed assessments, such as the SAT, ACT, and Keystone to assess progress towards academic performance goals. The Applicant presents an assessment plan (Revised Attachment 3) that outlines the applicable grades, frequency, baseline, and annual benchmark goals to track progress to the overarching performance goals for academic performance, academic growth, futures-focused leadership, and global competence. The inclusion of the assessment data is comprehensive and thorough.</p>
<p>DATA-DRIVEN INSTRUCTION</p>	<p>The Revised Application for the proposed Charter School includes significant revisions to the data-driven instruction section of the Original Application. The Applicant presents a plan that relies on using a variety of assessment data to review in Instructional Strategy Meetings. The plan, as described, is appropriate for an approach to data-driven instruction. The Application provides evidence of the Applicant's ability to implement the model described. The Applicant notes, "The basis of this system is the weekly Instructional Strategy Meeting ("ISM"). ISMs will occur on Wednesdays during professional development time, in alignment with instructional practices and strategy module workshops" (p. 20, Revised Narrative).</p> <p>The Applicant continues to be unclear how data will be collected and used in a codified system beyond a "database" that will contain student assessment data (p. 21, Revised Narrative), though the Applicant notes that this database will be shared with the MTSS team and teachers.</p>

PROMOTION AND RETENTION	<p>Minor changes were identified in the promotion and retention section of the Revised Application for the proposed Charter School. The Applicant identifies the process for acquiring credits and opportunities for students to recover credits as needed. Students must achieve a 75 or higher in a course in order to earn the credit. If a student fails one or two academic courses in a school year, they will have the option to attend credit recovery through Keystone Recovery online with the support of a school-based mentor. The Applicant notes that, "If a scholar opts for a credit recovery option, they may assume some of the material costs for the program" (p. 22, Revised Narrative).</p> <p>The proposed Charter School would require students to pay for the costs of credit recovery, which may create financial barriers for students in accruing the credits required to graduate from GLAICHHS. Additionally, the expectation that numerous credits will be made up at Intersession may be unrealistic in cases where students lack a large number of credits.</p> <p>The Original Evaluation Report states:</p> <p><i>The Applicant does not explain options for students who fail more than two credits in a school year or how students will proactively be supported to avoid failure beyond an option to "attend Intersession to make up missing requirements, and work with their teacher to ensure understanding and skill mastery" (p. 21, Revised Narrative). Later in the Revised Narrative, it is noted that students will have the support of advisors and "Real World Leaders," but the proposed Charter School heavily relies upon students "who miss six or more classes in any course to attend Intersession to make up missing assignments" (p. 25, Revised Narrative).</i></p> <p><i>The proposed Charter School has a non-academic measure for promotion related to its focus on "real-world self-management currencies" (p. 22, Revised Narrative). Students must pass their Freshman and Sophomore Seminars and also attend an international trip or complete an alternative project. "Excursions are paid for by families and through grants, sponsorships, and fundraisers. No scholar is ever kept from travelling for financial reasons" (p. 40, Revised Narrative), and sufficient support is described for students who must complete the alternative project as opposed to participate in the international travel.</i></p>
HIGH SCHOOL APPLICATION AND SELECTION PROCESS <i>(if intending to serve Grade 8 by scale year)</i>	<p>Not applicable.</p>
GRADUATION <i>(if intending to serve high school grades by scale year)</i>	<p>Minor changes were identified in the graduation section of the Revised Application for the proposed Charter School. In the Revised Narrative, the Applicant provided an overview of how Act 158 will be implemented at the proposed Charter School. Additionally, the Applicant states that students enrolled after Grade 9 or after Grade 10 may complete an "independent study" to fulfill the freshman and sophomore seminar credit requirements. It is unclear how this independent study would be systematically monitored or supported.</p> <p>The Original Evaluation Report states:</p> <p><i>The graduation requirements outlined extend beyond the Pennsylvania requirements. In order to graduate, all students must complete the proposed Charter School's graduation requirements:</i></p> <ol style="list-style-type: none"> <i>1. Earn twenty-six credits in all required subjects</i> <i>2. Meet requirements of Act 158 (one of the five PDE Keystone Pathways)</i> <i>3. Earn the ACT National Career Readiness Certificate</i>

	<p>4. Participate in at least two international excursions</p> <p>5. Pass ninth and tenth grade Seminars</p> <p>6. Complete at least eighty hours of community service</p> <p>7. Research and apply to at least five colleges and/or post-secondary training programs</p> <p>8. Complete and present a Senior Capstone project (p. 23, Revised Narrative)</p> <p><i>The proposed graduation requirements may pose a barrier to graduation for a student enrolling after Grade 9 who may have previously attended a different high school. For example, while the proposed Charter School requires students to earn 7.5 credits to be promoted to Grade 10 and 13.5 credits to be promoted to Grade 11, the District requires students to earn 23.5 credits to graduate, with students being required to have 5 credits to be promoted to Grade 10, and 11 credits to be promoted to Grade 11. On-track District students transferring to the proposed Charter School would automatically need to participate in credit recovery in the event that they are enrolling after Grade 9.</i></p> <p><i>There are limited routes for students to earn recovery credits aside from online course recovery. According to the Applicant,</i></p> <p><i>As stated above, GLAICHHS's credit recovery program will provide scholars with an opportunity to make normal progress toward graduation through adult and peer tutoring, special courses offered face-to-face during Intersessions and after school, and through online learning during the school year. (p. 24, Revised Narrative)</i></p> <p><i>While there are supports named by the Applicant for students to earn credits throughout the year, the only way that students can recover credits is through online credit recovery for up to two courses. There is not an explicit opportunity for students transferring after Grade 9 to make up credits, and there is not an explicit opportunity for students in Grade 11 and Grade 12 to make up missing credits during the school day in place of a non-required elective.</i></p>
STUDENT PERSISTENCE <i>(if intending to serve high school grades by scale year)</i>	<p>The Revised Application for the proposed Charter School includes significant revisions to the student persistence section of the Original Application, specifically by addressing academic intervention for students who are at risk of failure due to academic needs. Students will be flagged through the MTSS process if they are failing courses and Real World Leaders and counselors will support in collaborating with the student's family.</p> <p>However, as noted above, the credit recovery process proposed by the Applicant creates barriers for students who do not start their high school career at the proposed Charter School. Additionally, the Revised Application notes, "If a scholar opts for a credit recovery option, they may assume some of the material costs for the program" (p. 22, Revised Narrative). This additionally may create financial barriers for students to accrue the credits required to graduate at GLAICHHS.</p>
Diverse Learners	
STUDENTS WITH DISABILITIES	<p>The Revised Application for the proposed Charter School includes significant revisions to the section of the Original Application about students with disabilities, including a more detailed overview of the continuum of services that the proposed Charter School will provide. The Applicant provides a Child Find Policy that references legally required components (Revised Attachment 45).</p> <p>The Applicant provides a plan to support students with a variety of needs, starting with an IEP team meeting where levels of programming are discussed and including the types of interventions that may be implemented. In the Revised Application, there is reference in the chart of "Staffing Needs and Responsibilities" on pages 30 and 31 of the Revised Narrative, of how students with more severe needs will be supported in the structure of the</p>

	<p>school, including a special education teacher specifically assigned to Autistic Support, Emotional Support, and Low Incidence programming.</p> <p>There continues to be a misalignment between the organization chart and the Revised Narrative. In the first year, "The special education teachers will work under the supervision of the Head of School and contracted Director of Special Services to review, implement, train" (p. 28, Revised Narrative). However, the contracted Director of Special Services is not listed on the staffing graph or organization chart (pp. 30-31, Revised Narrative and Revised Attachment 8). The Applicant later states, "The special education curriculum will be chosen by the Special Education Coordinator with support from the Director of Special Services (contracted)" (p. 29, Revised Narrative). It is unclear from whom the school-based special education leadership will receive support.</p>
ENGLISH LEARNERS <i>(Narrative and Attachment 4)</i>	<p>No substantive changes were identified in this area of the Revised Application. The Original Evaluation states:</p> <p><i>The Applicant states it does not expect a large number of students who are English learners (ELs), mirroring the demographics of GLACS and GLASW (p. 74, Revised Narrative). The Applicant provides an adequate Language Instruction Plan for English Learners for identifying, serving, reclassifying, and monitoring ELs (Revised Attachment 4).</i></p>
STUDENTS FROM DIVERSE RACIAL AND ETHNIC GROUPS	<p>The Revised Application for the proposed Charter School includes significant additions to the Original Application for this section. The Applicant describes its focus on students from diverse racial and ethnic groups: "GLAICHHS will offer culturally responsive and reflective educational programming to all scholars so that they see themselves reflected in all aspects of the school. GLAICHHS's proposed curriculum, competencies, and programs are built around equity-focused approaches" (p. 34, Revised Narrative). The Applicant also states that it follows PDE's Pillars of Equity. The Applicant notes, "Training in Equity in education is included in the workshop model. GLAICHHS will use PDE and PaTTAN resources to train staff and teachers in Equity" (p. 35, Revised Narrative). However, the Applicant does not identify any professional development related to equity or PDE/PaTTAN resources for equity in Revised Attachment 21. The Application highlights that elements of the proposed Charter School's MTSS and SWPBIS program utilize culturally responsive practices.</p>
STUDENTS REQUIRING ADDITIONAL ACADEMIC OR BEHAVIORAL SUPPORT	<p>The Revised Application for the proposed Charter School includes significant revisions to the section about students requiring additional academic or behavioral support in the Original Application. The Applicant outlines a MTSS framework to meet the academic and behavioral needs of students at the proposed Charter School. A three-tier level of support is outlined for academic, social-emotional, behavioral, and attendance needs for students. Each tier has clear criteria for entry and exit, as well as support type. There are research-based interventions offered to students that are individualized and utilize technology, such as AIMSweb and Read 180. However, there continues to not be a clear, objective guidance for student criteria for tiers of behavioral and social emotional support. In regards to supports, there is a non-exhaustive list of interventions provided, all of which are research-based.</p> <p>The Applicant identified in a previous section that there will be multiple assessments provided to determine need: "Scholars' academic and behavioral skill screens and benchmarks are important sources of data. These are administered three times per year via research-based instruments" (p. 21, Revised Narrative). However, the Applicant did not provide a defined set of screeners or tools that will be used as benchmarks for student progress.</p>

	<p>The Applicant provides a list of accommodations that teachers will provide to students: "Teachers will be required to know different strategies appropriate for a variety of learning styles, needs, and characteristics represented in their classrooms" (pp. 37-38, Revised Narrative). There is no provided framework for teacher observation, training, or evaluation to ensure that these intervention strategies are being implemented in classrooms.</p> <p>There are additional concerns from the Original Application that were not addressed by the Revised Application. The Applicant does not state which staff members will support or teach the small groups referenced in the MTSS support model. The proposed Charter School's staff titled "Real World Leader" will "assist scholars identified as needed support outside of GLAICHHS; they will help that school and their family obtain and/or access information needed to receive further support" (p. 38, Revised Narrative). However, it is unclear if the proposed Charter School has the appropriate staffing model to support this style of MTSS programming. It should also be noted that there is not a special services coordinator budgeted until Year 2, but is listed in the professional development plan as facilitating multiple trainings in Year 1 regarding MTSS and special education services (Revised Attachment 21).</p>
GIFTED STUDENTS	<p>Minor changes were identified in this area of the Revised Application. The Applicant provides an adequate plan for the identification process of gifted students. The Applicant states,</p> <p>Teachers will use concepts from Universal Design for Learning to plan and provide challenging projects for gifted scholars... curriculum and partnerships will allow for planned opportunities for advancement through advanced placement courses and/or college credit opportunities. Gifted scholars may also receive other opportunities for advanced learning through prerequisite course skipping, independent study, or other out-of-school activities (p. 38, Revised Narrative).</p> <p>In the Revised Application, the Applicant states,</p> <p>See Attachment 1 for further details within and beyond the curriculum for gifted scholars. These include specific courses, materials, lessons, instructional approaches, as well as opportunities for enrichment and advancement. The gifted program will be individualized according to areas of giftedness and the implementation of GIEPs and NORAs for those gifted scholars attending GLAICHHS (p. 38, Revised Narrative).</p> <p>The revised curriculum materials highlight some details about how curriculum materials may be utilized for the instruction of gifted students. However, a concrete, comprehensive set of curricular materials for serving gifted students is not present in the Revised Application. The Applicant has updated its staffing model to indicate that a gifted teacher will not be a part of the school staff but rather a contracted position.</p>
STUDENTS WITH LIMITED ACCESS TO TECHNOLOGY	<p>No substantive changes were identified in this area of the Revised Application. The Original Evaluation states:</p> <p><i>The Applicant does not provide an adequate plan to support students and families with limited access to technology. The Applicant states, "GLAICHHS is committed to being 1:1 for devices at school and at home. GLAICHHS will provide Wi-Fi devices and/or access to the school's internet account to connect scholars to the internet to provide a FAPE" (p. 39, Revised Narrative). However, the Applicant does not describe in detail the approximate number of anticipated students who may need this service or the corresponding costs. It is also unclear which staff will manage this process.</i></p>

	<p>The Applicant states, “GLAICHHS will maintain a scholar technology hub to provide technical assistance, whether in person or virtually, as well as a device repair system for school-issued devices, depending on the concern [...] Contracted tech personnel will be available for scholars onsite and will be overseen by GLAICHHS” (p. 39, Revised Narrative). The Application, however, shows in the attached budget a limited budgeted amount for a contracted technical support staff member (Revised Attachment 34). Contracted technical support staff will not be staffed full-time at the proposed Charter School. It is also unclear which staff member will manage the “technology hub” as the contracted technical support is part-time.</p>
Extracurricular Activities	
EXTRACURRICULAR ACTIVITIES	<p>Minor changes were identified in the extracurricular section of the Revised Application for the proposed Charter School. The Original Evaluation states:</p> <p><i>The Applicant provides a list of extracurricular and supplementary co-academic activities that will be available for students to participate in, depending on academic and disciplinary eligibility requirements, and discusses the importance of extracurricular and supplementary co-academic activities to scholars’ development and learning (pp. 39-40, Revised Narrative).</i></p> <p><i>Memoranda of Understanding (“MOUs”) were provided in Attachment 30 from organizations committed to “full partnerships” (p. 39, Revised Narrative): Barlow Enterprises, The Clef Club, First Tee, Institute for Humane Education, Jobs for America’s Graduates, Legacy Bridges STEM Academy, The Mann Music Center, Urban Youth Travel Alliance, World Affairs Council, We R.E.I.G.N., Niagara Bound Tours, and Urban Garden Initiative. Letters mentioning an intent to partner around extracurricular programs were also attached from American Women’s Heritage Society, Boardroom Radio Talk Show. Get Fresh Daily is mentioned in the Narrative but no documentation was attached.</i></p> <p>In the Revised Application, the Applicant clarifies, “Scholars will use SEPTA Student Fare Cards to travel to and from most of these activities; in some cases, buses for extracurriculars and field trips will be secured in alignment with District guidelines regarding distance, grade level, etc. (p. 39, Revised Narrative).</p>
Student Supports and Services	
SCHOOL CULTURE AND CLIMATE	<p>Minor changes were identified in the school culture and climate section of the Revised Application for the proposed Charter School. The Applicant now describes a clear plan for consistent and regular review of policies. Additionally, “Stakeholders do not need to wait for town hall meetings to address concerns or opinions; they will also be encouraged to voice opinions, concerns, or areas of interest directly to the school administration” (p. 42, Revised Narrative).</p> <p>The Original Evaluation states:</p> <p><i>The Applicant identifies a school climate and culture with a mindset needed to create a safe learning environment for students, but lacks tangible actions in all domains to support all marginalized students. The proposed Charter School will use a “School Wide Positive Behavior Intervention Support Program (“SWPBIS”) to reinforce positive behaviors. There is a comprehensive plan related to for bullying and harassment in the Narrative and Revised Attachment 26, including tangible programming to build student mindset and support an open, safe environment for students.</i></p>



	<p><i>While the Applicant notes a framework to support gender nonconforming students, there is limited tangible programming that will support staff and students in following the framework. The four-part framework is as follows: "Immerse School Staff in Literature," "Model Respect for All Scholars," "Uphold Professionalism," and "Build Relationships and a Culture of Respect and Safety" (p. 41, Revised Narrative). Each of these parts would impact school culture and mindset regarding gender nonconforming students, but there is not an implementation plan as to how these parts will be enacted for staff or students. There is no training or accountability measure to ensure the safety of gender nonconforming students. Beyond trainings during pre-service professional development, there is limited ongoing training to support staff in developing mindset around gender nonconforming students and developing an antiracist mindset.</i></p>
STUDENT HEALTH SUPPORTS AND SERVICES	<p>The Revised Application for the proposed Charter School includes significant revisions to the section of the Original Application about student health and supports services. Namely, the Applicant identifies the members who will be on the SAP team, such as, "Teachers, parents, counselors, social workers, and other support team members" (p. 43, Revised Narrative). Additionally, the revised Narrative identifies from where in the proposed Charter School budget additional uniforms will be purchased.</p> <p>Overall, the Applicant provides a data-filled overview demonstrating an understanding of the issues that impact the target communities of North Philadelphia and West Philadelphia; however, the Applicant does not provide a codified plan for addressing many of these issues. The Applicant identifies a series of local community and national resources that can be used to support students, but there is not an identified staff member responsible for these connections or relationships.</p> <p>The Application states that a variety of resources will be utilized for student support and identification, particularly through the Student Assistance Program ("SAP"). The proposed Charter School relies heavily on student advisors "who will stay with them through all years of high school" (p. 44, Revised Narrative), but the Applicant does not identify retention strategies to ensure that staff remain for the full four years.</p>

ORGANIZATIONAL CAPACITY AND COMPLIANCE	
<p>This section provides an overview of the proposed Charter School’s founding coalition, governance, staffing, professional development, and operational plans.</p>	
STANDARD	FINDINGS
Founding Applicant/Coalition	
<p>APPLICANT CAPACITY (Narrative and Attachment 5)</p>	<p>Minor changes were identified in the Revised Application section about applicant capacity. In a cover letter and response document submitted along with the Revised Application, the Applicant asserts, "The applicant is the Board of Trustees of GLAICHHS... The applicant and all other schools mentioned in this application are independently run by their own administrations and boards of trustees" (p. 3, Adjudication, Response and Resubmissions).</p> <p>The Original Evaluation states:</p> <p><i>The Application was submitted by GLAICHHS. The founding coalition is primarily comprised of individuals who currently work for Global Academies, GLACS, or GLASW. Two members of the founding coalition are education consultants.</i></p>

	<p><i>The Applicant describes the founding coalition as,</i></p> <p><i>Educators, business leaders, and community organizers who believe that the model offered by GLAICHS should be made available to students in Philadelphia... The members of the applicant team have the operational, governance, and financial breadth and depth of experience and expertise to effectively steward the proposed new school... Members of the founding coalition have extensive expertise at Philadelphia-area schools and K-12 and higher learning organizations around the country that will allow the proposed school to launch successfully. The founding coalition includes former teachers, lifelong Philadelphians with roots in the communities GLAICHS intends to serve, experienced administrators, and accomplished professionals with business and law backgrounds. (p. 38, Revised Narrative)</i></p> <p><i>The founding coalition consists of the following individuals, whose resumes (Attachment 5) indicate that most of them are current employees of Global Academies, GLACS or GLASW:</i></p> <ul style="list-style-type: none"> • <i>Alicia Kennedy (Director of Special Services, Global Leadership Academies)</i> • <i>Bar-rae Choice (Chief of School Operations, Executive Team Member, Global Academies)</i> • <i>Deborah Stern (Principal at R4 Education Consulting Services)</i> • <i>Naomi Booker (Chief Executive Officer, Global Leadership Academy Charter School)</i> • <i>Zenobia Nicole Story (Principal, Global Leadership Academy Southwest)</i> • <i>Kim Fuller (Family Life, Global Academies)</i> • <i>Kimberly Johnson (Compliance Officer, Global Academies)</i> • <i>Omar Barlow (Educational Consultant & Lead Facilitator, Be More Excellent University and also Founding Principal at Eastern Academy Charter School)</i> • <i>Orrika Blanding-Choice (Interim Assistant Principal, Global Leadership Academy Charter School)</i> • <i>Paul Kennedy Sr. (Director of Scholar Advancement/PBIS Coordinator, Global Leadership Academy Southwest)</i> • <i>Richard Walker Jr. (Information Systems Coordinator, Global Academies)</i> • <i>Tamika Michelle Evans (CEO, Global Leadership Academy Southwest)</i> • <i>Trina Jones (Executive Director, Global Academies)</i>
<p>INCORPORATOR (Narrative and Attachment 6)</p>	<p>The Revised Application for the proposed Charter School includes significant revisions to the incorporator section of the Original Application, adding detail about the incorporation discharge and the asset dissolution process and asserting that this Application is not a revision of previous requests from several years ago to open a charter high school and add high school grades through an amendment request.</p> <p>GLAICHS was originally incorporated on October 8, 2015. The Incorporator is David Hussey, a lawyer at the law firm of Sand & Saidel (Revised Attachment 6). The corporation filed a change of Registered Office on February 9, 2017. GLAICHS had submitted new charter applications to the School District in November 2014 and in November 2015, and the School Reform Commission ("SRC") denied both applications.</p>

	<p>The Applicant provides more details in the revised Narrative regarding the incorporator, stating, "The Incorporator of GLAICHHS is its general counsel, Sand & Saidel, P.C. An inception meeting occurred, and the incorporator was discharged on June 29, 2022. Thus, the transition of responsibility from the Founding Coalition to the Board of Trustees has already occurred and the Incorporate [sic] divested of its duties" (p. 45, Revised Narrative).</p> <p>Though the articles of incorporation for GLAICHHS date back to 2015, the Applicant states that this Application is "not a revision of the application submitted in 2015; it is a brand new application, with a different and new Board of Trustees and a new and different vision for a high school" (p. 27, Adjudication, Response and Resubmissions).</p> <p>The liquidation, dissolution, and winding-up provisions in the Articles of Incorporation are not in compliance with the Charter School Law, which requires the following when a charter school is dissolved: "After the disposition of any liabilities and obligations of the charter school, any remaining assets of the charter school, both real and personal, shall be distributed on a proportional basis to the school entities with students enrolled in the charter school for the last full or partial school year of the charter school" (24 P.S. § 17-1729-A(i)).</p> <p>In a cover letter and response document submitted along with the Revised Application, the Applicant states, "There is no CSL requirement that the Articles of Incorporation of an entity intended to be a charter school contain the asset dissolution processes contained within the CSL (p. 23, Adjudication, Response and Resubmissions). The Applicant notes that the GLAICHHS bylaws state the process for disposition of liabilities, obligations, and any remaining assets.</p>
Governance	
<p>PROPOSED / POTENTIAL BOARD MEMBERS (Narrative and Attachment 7)</p>	<p>No substantive changes were identified in this area of the Revised Application. The Original Evaluation states:</p> <p><i>The Applicant submitted resumes for four potential board members with experience in education, consulting, student advising, technology, and engineering, though none of the four individuals appears to have experience managing a charter school.</i></p> <p><i>Despite the fact that the proposed Charter School is not currently authorized, the Applicant states, "The following people serve on GLAICHHS's Board and are actively governing the school" (p. 45, Revised Narrative). The four proposed individuals are:</i></p> <ul style="list-style-type: none"> • <i>Colona Roberts, a business coach and career consultant who has been a teacher, child care operator, and principal in Philadelphia, is identified as the president of the Board of Trustees</i> • <i>Elvita Quinones, Associate Director of the Center for Undergraduate Advising at Temple University Fox School of Business</i> • <i>Stacy Frenche, IT Manager at Automated Financial Systems Inc.</i> • <i>Vanessa Nedrick, engineer at Remington & Vernick</i> <p><i>The Application did not include a plan to transition from the founding coalition to governance by the Board of Trustees, and no members from founding coalition are proposed as Board members. The Applicant plans to recruit "additional trustees ... who will balance the strengths of the Board" (p. 46, Revised Narrative). The proposed bylaws</i></p>

	<p><i>require that the Board be composed of not more than seven members, including at least one parent of an enrolled student (Revised Attachment 9, p. 2).</i></p>
<p>BOARD RESPONSIBILITIES <i>(Narrative and Attachment 8)</i></p>	<p>The Revised Application for the proposed Charter School includes significant revisions to the Original Application in the section about board responsibilities, but there are still questions about the relationship between GLAICHHS, Global Academies, GLACS, and GLASW.</p> <p>The Applicant states, “The Board will independently and solely run GLAICHHS, in accordance with 24 P.S. § 17-1716-A” (p. 46, Revised Narrative), and that “The Board will not cede any management authority to any non-profit or for-profit organization” (p. 46, Revised Narrative).</p> <p>The Organizational Chart depicts the CEO/Head of School (or CEO as the staff grows over the term) reporting to the Board of Trustees.</p> <p>In this section and throughout the revised Narrative and the accompanying documents, the Applicant provides further description of Global Academies, an organization that it states “cannot be classified as an education management organization” because it also works with other organizations that are not schools (p. 3, Adjudication, Response and Resubmission). Although the Application states that the proposed Charter School will not work with a management company, it also states:</p> <p>GLAICHHS intends to engage Global Academies in a vendor services and licensing agreement for the use of the Global Leadership Academy model at GLAICHHS. The agreement will be central to ensuring successful adaptation of these key components. Global Academies will advise GLAICHHS on developing independent systems for:</p> <ul style="list-style-type: none"> • Staff leadership training • Assisting with credentialing of staff, subject to GLAICHHS’ [sic] oversight • Proposing policies for GLAICHHS’ Board of Trustees to consider and approve • Supporting any GLAICHHS’ initiative to renew its charter agreement • Providing tools to the GLAICHHS’ School Leader to evaluate school leadership • Assisting GLAICHHS’ with its Human resources management • Advising GLAICHHS’ review of compliance issues with the Department of Education and School District of Philadelphia • Review of GLAICHHS’ preparation of annual reports • Development of marketing materials/brochures • Public relations and marketing • Grant writing • Providing resources to GLAICHHS in order to ensure data compliance • Assisting GLAICHHS to warehouse and analyze data • Professional development. (p. 52, Revised Narrative) <p>No contract or agreement was provided with the Application because “currently GLAICHHS and Global Academies are negotiating the exact services that will be provided to the school” (p. 25, Adjudication, Response and Resubmission), and because the “Application Guidelines did not request contracts from other vendors who may provide educational support services but are not charter management organizations” (p. 26, Adjudication, Response and Resubmission).</p>

	<p>The Narrative states that in accordance with Act 55, the Board members will be trained regarding the Sunshine Act, Public Official and Employee Ethics Act, and Open Records Law. Board meetings will be scheduled "once per month, except for July and December. Meetings will be conducted in accordance with the Sunshine Act at the school facility; if necessary, meetings will be moved online with a link available for public access" (p. 40, Narrative).</p> <p>The Applicant states that "GLAICHHS can be found in the Internal Revenue Service's charity database" (p. 46, Revised Narrative), but a search of the database only returns information about GLACS, GLASW, and Global Academies. Global Academies has an EIN (85-3492105) registered to Sand and Saidel attorney David Annecharico, and the organization's website does list a separate Board for Global Academies.</p> <p>Based on the Application, it appears that the Applicant is also represented by Sand and Saidel as its legal counsel. Because Sand and Saidel apparently also represents Global Academies, the entity with which GLAICHHS is to contract, there are concerns about potential conflicts of interest over the negotiations of the agreements between GLAICHHS and Global Academies. The Applicant states, "GLAICHHS's Board of Trustees has an approved conflict waiver" (p. 24, Adjudication, Response and Resubmission) regarding legal representation, but the waiver was not attached.</p>
<p>GOVERNANCE APPROACH (Narrative and Attachments 9 and 10)</p>	<p>Minor changes were identified in an attachment related to the governance approach section of the Revised Application for the proposed Charter School. The Applicant submitted a revised Conflict of Interest Policy that corrected the name of the school and removed the name of another school that appeared in the attachment in the Original Application.</p> <p>The Original Evaluation States:</p> <p><i>The Applicant states that the Board will have ultimate responsibility for the school, and will collaborate and communicate with the school administration.</i></p> <p><i>"The Board's policies and activities will be reviewed by its general counsel for compliance with relevant laws and regulations" (p. 47, Revised Narrative). The Narrative contains a list of standing committees: Nominating, Finance and Facilities, Academic Assessment Curriculum, Personnel, Discipline, and Audit.</i></p> <p><i>The bylaws state that there will be no more than seven members and that at least one member will be a parent of a student enrolled in the Charter School (p. 2, Attachment 9). The bylaws do not state what the minimum number of members on the Board of Trustees will be. Under the bylaws, no Trustee "shall maintain substantial personal or business interests which conflict or which may be seen as conflicting with those of the Charter School" (p. 9, Revised Attachment 9). It is not clear how "substantial personal or business interests" are defined or determined.</i></p>
<p>Third-Party Service Providers Managing Educational, Operational, and/or Financial Functions</p>	
<p>THIRD-PARTY SERVICE PROVIDERS (Narrative and Attachments 11 and 12)</p>	<p>Minor changes were identified in this section of the Revised Application for the proposed Charter School. While no specific entities are mentioned in the section about third-party service providers, the Applicant states, "The GLAICHHS Board has begun preliminary discussions with third party service providers to determine what services will be provided to the school once a charter has been granted" (p. 48, Revised Narrative).</p> <p>The Original Evaluation states:</p>



	<p><i>The Applicant specifically states:</i></p> <p><i>GLAICHS does not plan to contract with a Charter Management Organization but does plan on contracting with third-party providers who will provide support services related to instructional programming, financial, special education services, compliance, operations, and human resources. (p. 48, Revised Narrative)</i></p> <p><i>The Applicant does not make clear what entity it will be contracting with to “provide support services related to instructional programming, financial, special education services, compliance, operations, and human resources” (p. 42, Revised Narrative). It is not clear if Global Academies, GLACS, or GLASW would be providing these services, and, if so, the costs of such services. A services agreement has not been submitted for these services. Since these services are integral to the operations of the proposed Charter School and the provision of educational services, the failure of the Charter School to address this issue is concerning.</i></p> <p><i>The Applicant provided agreements for services related to technology, financial management, health, and security. The details are discussed in the sections below. The Applicant also mentions that it will work with a Food Service Management Company for food services, but did not provide an agreement or contract.</i></p>
School Operations	
OPERATIONS OVERVIEW	<p>No substantive changes were identified in this area of the Revised Application. The Original Evaluation states:</p> <p><i>The Applicant describes that internal operations will be managed by the leadership team of the proposed Charter School, with staff being added as the enrollment increases. The Director of Operations and CEO will manage</i></p> <p><i>All aspects of school operations, such as school enrollment, attendance, food service, and facilities. The facilities manager will be responsible for the maintenance and upkeep of the physical school facility and supervise the school maintenance team. The facilities manager will perform necessary repairs, within reason, and serve as the point of contact for all building maintenance needs. (p. 49, Revised Narrative)</i></p> <p><i>"Certain services will be contracted as GLAICHS will not be managed by an external organization" (p. 49, Revised Narrative). These include security services, financial management, health services, and technology services.</i></p> <p><i>As stated above, Global Academies will also be involved in some operations areas as the proposed Charter School develops its own systems. The Applicant, however, has not provided an agreement with Global Academies or detailed the costs of such assistance from Global Academies. If the proposed Charter School is approved, the charter school and Global Academies would need to enter into fully negotiated arms-length contracts requiring the payment of fees by the charter school for the services and licensing provided by Global Academies."</i></p>
TECHNOLOGY MANAGEMENT (Narrative and Attachment 13)	<p>Minor changes were identified in the technology management section of the Revised Application for the proposed Charter School. The Applicant added a statement that "Once a charter is received, an updated and finalized agreement will be presented to the Board for approval" (Revised Narrative, p. 49).</p> <p>The Original Evaluation Report states:</p>



	<p><i>The contracted resources will provide technology services, and a draft proposed contract from Intelligent Networks was attached. The organizational chart indicates that the "Contracted Tech Support" would report to the CEO/Head of School.</i></p> <p><i>The Applicant provided a draft agreement for technology services with Intelligent Networks. The duration of the agreement has expired, since the agreement states the contract will end on June 30, 2021. The agreement states, "This Agreement shall commence on date of signature and shall terminate on June 30, 2021 unless earlier terminated by either party hereto. Either party may terminate this Agreement upon Thirty (30) days prior written notice" (p. 3, Revised Attachment 13). Per the agreement with Intelligent Networks, the rate listed is between \$50 and \$100 per hour depending on level of services. The agreement states,</i></p> <p><i>In consideration for the Consulting Services to be performed by Consultant under this Agreement, the School will pay Consultant at the rate of \$100 per hour for Level 3 support as defined in Attachment A. School will pay consultant \$75.00 per hour for Level 2 support as defined in Attachment A. Level 1 service is in Attachment A at \$50.00 per hour. The School shall pay Consultant the amounts due pursuant to submitted invoices within 30 days after invoices are received by the School. (p. 2, Revised Attachment 13)</i></p> <p><i>Technological services are budgeted at \$18,750 in Year 1, \$37,500 in Year 2, \$63,750 in Year 3, and \$90,000 in Years 4 and 5.</i></p> <p><i>The proposed Charter School intends to "seamlessly integrate technology into its classrooms and school culture" (p. 43, Revised Narrative) and to provide equitable access to devices.</i></p> <p><i>All scholars will have access to technology regardless of economic status. GLAICHHS is committed to being 1:1 for devices at school and at home. GLAICHHS will provide Wi-Fi devices and/or access to the school's internet account to connect scholars to the internet to provide a FAPE. GLAICHHS will maintain a scholar technology hub to provide technical assistance, whether in person or virtually, as well as a device repair system for school-issued devices, depending on the concern. If a device is broken, a replacement will be provided to the scholar for continuity of education while their device is being fixed. Contracted tech personnel will be available for scholars onsite. (p. 39, Revised Narrative)</i></p> <p><i>\$55,000 is budgeted for Technology in Year 1 and 5, and \$65,000 is budgeted in Years 2, 3, and 4. Computers are budgeted at \$21,000 in Year 1, \$21,500 in Year 2, \$20,500 in Year 3, \$17,500 in Year 4, and \$21,500 in Year 5. Internet is budgeted at \$15,000 in Year 1, \$30,000 in Year 2, \$45,000 in Year 3, \$60,000 in Year 4, and \$61,800 in Year 5.</i></p>
BUSINESS AND FINANCIAL MANAGEMENT <i>(Narrative and Attachment 14)</i>	<p>No substantive changes were identified in this area of the Revised Application. The Original Evaluation states:</p> <p><i>The Applicant states that they intend to contract with two third party providers: Santilli & Thomson, LLC and Global Academics. The Applicant did not provide an agreement or contract between the school and Global Academics. The Applicant states "GLAICHHS intends to engage Global Academics in a vendor services and licensing agreement for the use of the Global Leadership Academy model at GLAICHHS. The agreement will be central to ensuring successful adaptation of these key components" (p. 50, Revised Narrative).</i></p> <p><i>The Applicant states Santilli & Thomson will provide accounting services, budget services, financial reporting, cash management, payroll management, and other financial services (pp.</i></p>

	<p>50-51, Revised Narrative) which aligns with the consulting agreement with Santilli & Thomson. In the consulting agreement between the Applicant and Santilli & Thomson LLC, its states the school is located at 4601 W. Girard Avenue, Philadelphia PA 19131 (p. 3, Revised Attachment 14) which is the address of the Applicant and not the school. The duration of the agreement is from July 1st, 2023 to June 30th, 2028 unless extended (p. 3, Revised Attachment 14). The contract price is \$20,000 for preliminary work, \$55,000 in Year 1, \$65,000 in Year 2, \$75,000 in Year 3, \$85,000 in Year 4 and \$90,100 in Year 5 (p. 6, Revised Attachment 14). The cost for preliminary work, Years 2 through 5 aligns with the budget. The cost for Year 1 does not align with the budget which states \$30,000 on the budget, but \$55,000 in the agreement.</p>
<p>FOOD SERVICES (Narrative and Attachment 15)</p>	<p>Minor changes were identified in the food services section of the Revised Application for the proposed Charter School. The Applicant explains why it did not provide a Food Services Provider Agreement: “Without a charter, GLAICHs is unable to provide a food service provider agreement” (p. 51, Revised Narrative).</p> <p>The Original Evaluation states:</p> <p><i>The Applicant intends to participate in the National School Lunch Program and provide free breakfast and lunch to all scholars. The Applicant states,</i></p> <p><i>Upon approval of its charter, GLAICHs will apply to PDE for sponsorship of a National School Lunch and School Breakfast Program. Given GLAICHs’s expected demographics, the applicant team anticipates that the school will meet the threshold to qualify for a CEP after its first year of participation and will not charge scholars during the first year. The administration will distribute Free and Reduced Meal applications during the first year of operation to establish a base year for CEP for participation. Enrollment numbers will be evaluated before the end of the first school year and the application for CEP will be submitted. (p. 51, Revised Narrative)</i></p> <p><i>The Applicant provides contractual provisions but does not provide a contract or agreement. The Narrative states the Applicant will issue an RFQ in compliance with federal contracting guideline for food services operations with a one-year term with a renewable three additional years (p. 51, Revised Narrative). The Applicant states termination will be based on performance per contract standards. The Applicant has a budget of \$50,000 in Year 1, \$100,000 in Year 2, 170,000 in Year 3, \$240,000 in Year 4 and \$240,000 in Year 5 for Food Service Management Company but did not provide information on who the Food Management Company will be.</i></p>
<p>STUDENT HEALTH SERVICES (Narrative and Attachment 16)</p>	<p>No substantive changes were identified in this area of the Revised Application. The Original Evaluation states:</p> <p><i>The Applicant does demonstrate a clear and consistent understanding of State requirements for student health services. The Applicant understands what health screenings are required for its grade span. The Applicant will have a licensed school nurse to monitor scholar’s health needs, and perform health screenings and other assessments. The Applicant states:</i></p> <p><i>GLAICHs will have a licensed school nurse to serve scholars’ health needs. The school nurse will perform assessments, interventions, and provide follow-up care for enrolled scholars. They will also conduct mandated health screening programs, verify immunizations, verify immunizations, identify, and manage scholars’ chronic health care needs. (p. 43, Revised Narrative)</i></p> <p><i>The Applicant will contract with one or more third-party providers to obtain nursing and physician services (p. 52, Revised Narrative). This language includes the reference of</i></p>

	<p><i>"physician services," but there is no expenditure for this service included in the budget. The Agreement is between the Applicant and MACCS Health Services and the term is to begin on September 5th, 2023 for nursing services, school physician services, additional health services and administrative services. The agreement states, "This Agreement is for the term commencing on the 5th day of September, 2023 and continuing ten (10) months thereafter, until 21st day of June, 2024 (the "Term"), unless terminated sooner as provided herein" (Revised Attachment 16). In the agreement, the cost of services for the 2023 – 2024 SY is \$59,525.10 for twenty-five (25) hours of nursing services per week (p. 18, Revised Attachment 16) or \$76,953.70 for thirty (30) hours of nursing services per week (p. 38, Revised Attachment 16) with a payment schedule breakdown, but the Applicant did not include this service in the budget.</i></p>
<p>SCHOOL BUILDING SECURITY (Narrative and Attachment 17)</p>	<p>A minor change was identified in the school building security attachment in the Revised Application. Dr. Booker signed the agreement with In-Line Security in the Original Application, but in the Revised Attachment 17, the signer is Colona Roberts, the proposed GLAICHS Board president.</p> <p>The Original Evaluation states:</p> <p><i>The Applicant will not use metal detectors or other forms for daily screening but will continue to evaluate security measures. The Applicant states:</i></p> <p><i>GLAICHS does not anticipate using metal detectors or any other form of daily screening for individuals entering the building, or that security guards will possess guns or tasers. However, GLAICHS will periodically assess its safety and security practices to identify strategies to improve school safety and security. Accordingly, GLAICHS will continually evaluate its security strategies, including whether any changes should be made to the types or levels of building security (p. 53, Revised Narrative).</i></p> <p><i>The full scope of training is not provided as the Narrative only states, "All contracted security guards will be required to provide background checks and clearances and will be appropriately trained to perform their duties, including trainings required pursuant to Article XIII-C of the Public School Code. GLAICHS anticipates that security guards will perform the services described in 24 P.S. § 13-1314-C(a)" (p. 53, Revised Narrative).</i></p> <p><i>The Applicant intends to use In-Line Security Co., LLC to provide security services, with security officers who will "monitor the front desk, patrol outside the perimeter watching for illegal activities, perform crowd control and the removable [sic] of irate residents, and assure a safe environment at all times" (p. 3, Revised Attachment 17).</i></p> <p><i>It is not clear what the fee will be because the Applicant's budget and the agreement with In-Line Security Co., LLC do not align. In the Agreement, the Applicant will be charge \$21 per hour per Security Officer for regular security services, \$31.50 per hour for all major holidays (p. 3, Attachment 17). The budget which states \$30,000 in Year 1, \$30,900 in Year 2, \$31,827 in Year 3, \$60,000 in Year 4 and \$61,800 in Year 5 for security services which does not adequately align with the fee in the Agreement. The agreement does not state the full duration of the contract.</i></p>
<p>TRANSPORTATION</p>	<p>No substantive changes were identified in the transportation section of the Revised Narrative, though the Applicant explains elsewhere that students will ride public transit to offsite extracurricular activities and "The school has budgeted for transportation costs associated with exceptional students under Special Education in the budget" (p. 20, Adjudication, Response and Resubmissions).</p>

	<p>The Applicant identifies the School District as the primary source of transportation for the proposed Charter School, in accordance with Public School Code. For students that are "beyond the scope of School District's obligations," (p. 53, Revised Narrative), the Applicant plans to outsource transportation responsibilities to a provider that will be "appropriately trained and have all legally required background checks and clearances" (p. 53, Revised Narrative).</p> <p>In this section, the Applicant did not address TransPasses, but in the section on Extracurricular Activities, the Applicant mentions, "Students will use SEPTA Student Fare Cards" (p. 39, Revised Narrative).</p> <p>The Applicant does not thoroughly address eligibility requirements for students in the School District. The Narrative mentions, "transportation needs beyond the scope of the School District's obligations" (p. 53, Revised Narrative) and uses a "Scholar's IEP" as an example (p. 53, Revised Narrative), and explains that these costs are included in the "Special Education" line in Revised Attachment 34.</p>
OTHER OPERATIONS AREAS	<p>No substantive changes were identified in this area of the Revised Application. The Original Evaluation states:</p> <p><i>The Narrative does not include an Other Operations Areas section.</i></p>
Dissolution Plan	
DISSOLUTION PLAN	<p>Minor changes were identified in the dissolution plan section of the Revised Application for the proposed Charter School. The Applicant states, "The Bylaws of the corporation further provide that GLAICHHS will follow 24 P.S. § 17-1729-A's provisions regarding dissolution should the corporation dissolve at any point" (p. 54, Revised Narrative). The Applicant also states that Charter School Law does not require Articles of Incorporation to contain asset dissolution processes (p. 23, Adjudication, Response and Resubmissions).</p> <p>However, as the Original Evaluation report states:</p> <p><i>The proposed dissolution plan in the Narrative includes designating a dissolution manager to oversee the dissolution and closure process, accounting for scholar and personnel records, satisfying liabilities and distributing assets, conducting a final financial audit, establishing an escrow account, and ensuring that scholars transfer to new schools (pp. 53-54, Revised Narrative). As noted earlier, the liquidation, dissolution, and winding-up provisions in the Charter Schools' Articles of Incorporation are not in compliance with 24 P.S. § 17-1729-A(i) governing the dissolution of a charter school.</i></p>
School Leadership	
SCHOOL LEADER/ PRINCIPAL (Narrative and Attachment 18)	<p>No substantive changes were identified in this area of the Revised Application. The Original Evaluation states:</p> <p><i>The Applicant has not identified a proposed School Leader. The Application adequately outlines the reporting structure for the School Leader and includes a job description (Revised Attachment 18) for the hiring of a CEO/Head of School. Overall, the job description appears adequate in its candidate qualifications and areas of responsibilities for the position. The Application does not detail any recruitment plan for the hiring of a CEO/Head of School.</i></p>

LEADERSHIP TEAM (Narrative and Attachment 19)	<p>Minor changes were identified in the leadership team section of the Revised Application for the proposed Charter School, including updating some job descriptions and titles. The Original Evaluation states:</p> <p><i>The Application does not identify individuals to serve in the Leadership roles described in the Application. The Applicant identifies the following positions as part of the Leadership Team:</i></p> <ol style="list-style-type: none"> 1. CEO 2. Head of School 3. Assistant Head of School 4. School Climate and Culture Coordinator, and 5. Four Real World Leaders (p. 55, Revised Narrative) <p>As part of Revised Application and Attachment 19, the Applicant submitted six job descriptions. The six job descriptions were for Assistant Head of School, CEO/Head of School, CEO, Climate Specialist, Real World Leader, and Special Services Coordinator. There is a misalignment in the roles listed in the Narrative and the job descriptions in Revised Attachment 19. Further, the Applicant explains, "The CEO will act as both CEO and Head of School for the first two years of the first charter term" (p. 55, Revised Narrative). While the Applicant provides two separate job descriptions for "Chief Executive Office/Head of School" and "Chief Operating Officer," it is unclear how the responsibilities of the Head of School and CEO will differ after the first two years of the proposed charter term.</p>
Talent Acquisition, Development, and Evaluation	
RECRUITMENT OF TEACHING STAFF (Narrative and Attachment 20)	<p>No substantive changes were identified in this area of the Revised Application. The Original Evaluation states:</p> <p><i>The Applicant outlines a general plan for the recruitment of highly qualified and certified teachers. The Applicant names common platforms for posting vacancies and outlines an interview process that is common and appropriate for the hiring of instructional staff. The Applicant notes, "GLAICHHS intends to achieve a one hundred percent certification rate by evaluating only those job applicants who are completely certified in their academic areas. The only deviations from this policy would be for staff members who fall out of certification in non-academic areas" (p. 56, Revised Narrative). The Applicant does not make mention of current teacher and other staffing shortages, nor does it mention how it plans to ensure that all vacancies are hired for by the time of the proposed start year.</i></p>
LEADERSHIP/ STAFF DEVELOPMENT (Narrative and Attachment 21)	<p>No substantive changes were identified in this area of the Revised Application. The Original Evaluation states:</p> <p><i>The Applicant outlines a comprehensive plan for the development of leadership and staff. The development plan, according to the Applicant, will serve the following purposes:</i></p> <ul style="list-style-type: none"> • Enhance and improve scholar learning • Strengthen teachers' instructional practice • Provide continued learning opportunities • Update practice to incorporate current research and trends • Recognize staff expertise/talent • Allow staff to learn from noted experts in the field • Facilitate communication across the school • Foster the sense of school as a learning community (p. 56, Revised Narrative)

	<p>Attachment 21 outlines numerous components of the professional development plan, including new teacher induction, mentoring structure, annual training, and specialized training. Every professional employee teaching at the proposed Charter School for the first time must complete one full year of induction activities. New teachers will attend two days of professional development at a New Teacher Academy in August that are specifically targeted towards teachers in their first year at the proposed Charter School (p. 60, Revised Narrative).</p>
<p>LEADERSHIP/STAFF EVALUATION (Narrative and Attachment 22)</p>	<p>No substantive changes were identified in this area of the Revised Application. The Original Evaluation states:</p> <p><i>The Applicant outlines a comprehensive plan for the evaluation of staff and school leaders. The Applicant states that:</i></p> <p><i>The Professional Performance Framework will be used to:</i></p> <ul style="list-style-type: none"> • Provide data for annual or semi-annual professional performance ratings of teachers and administration • Identify strengths and weaknesses in teaching and leadership • Provide enhancement and support where necessary to enable optimal function • Facilitate harmony between instructional program and the established learning community objectives and programs • Provide a form of advocacy for best practices and the encouragement of leadership in curriculum implementation and scholar motivation • Utilize assessments for overall evaluation of school-wide program planning and the administrative mission (p. 61, Revised Narrative) <p>Revised Attachment 22 includes The New Teacher Project Teaching Rubric, The New Teacher Project Core Classroom Walk-Through Tool, the proposed Charter School's leadership team performance expectations, CEO evaluation form, supervisory evaluation form, and individualized professional development plan template. The cover sheet for Revised Attachment 22 states that a staff performance evaluation would be included as well. However, this does not appear to be the case. The Applicant states, "Non-teaching staff will also meet with the CEO to set goals for the year and develop a plan to achieve those goals" and "The primary difference will be that non-teaching staff will be evaluated based on the accomplishment of the tasks outlined in their job descriptions rather than on accomplishment of curriculum objectives and scholar achievement as specific in the teachers' PDPs" (p. 61, Revised Narrative).</p>
<p>Staff Benefits</p>	
<p>HEALTH CARE (Narrative and Attachment 23)</p>	<p>The Revised Application for the proposed Charter School includes significant revisions to the Original Application</p> <p>The Applicant submitted a proposed health care plan as Revised Attachment 23. The benefits proposed are comparable to the health care benefits that would be offered to an employee of the District, as required by the Charter School Law. The Charter School will offer similar health coverage in terms of benefits and range of services covered by the policy to what the local district offers, albeit at a higher cost to the employee.</p>
<p>RETIREMENT PLAN (Narrative and Attachment 24)</p>	<p>The Revised Application for the proposed Charter School includes a new paragraph in the Narrative section on the retirement plan that is different from what was in the Original Application, removing PSERS participation and instead stating,</p>

	<p>Employees will automatically be enrolled in a PSERS alternative 403(b) plan. Employees will be required to contribute five percent (5%) of their salary to the PSERS alternative 403(b) plan, with an employer match of five percent (5%). Employees may contribute beyond the initial five percent (5%), without an employer match. (p. 63, Revised Narrative)</p> <p>The Applicant submitted a copy of a notice to GLAICHS employee of a proposed alternative 403(b) retirement plan with PenServ, but the notice did not provide information about the required five percent employee contribution and five percent employer match (Revised Attachment 24). The employer cost of five percent of salaries for the 403(b) plan is budgeted.</p>
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Application, Lottery, Admission, and Enrollment Process

<p>NEW STUDENT APPLICATION AND LOTTERY (Narrative and Attachment 25)</p>	<p>No substantive changes were identified in this area of the Revised Application. The Original Evaluation states:</p> <p><i>The Application describes a plan for its application, lottery, and waitlist, with the lottery date “subject to change based on the yearly admissions timeline” (p. 5, Revised Attachment 25). There are some contradictory elements in the Revised Narrative and Revised Attachment 25.</i></p> <p><i>The Admissions Policy (Revised Attachment 25) states that students who matriculate from GLACS and GLASW “are at risk of academic-failure in the public high school options, both School District and charter, that serve each school’s identified target community” (p. 4, Revised Attachment 25). Therefore, there would be an admission preference for current students at the proposed Charter School and students attending GLACS and GLASW, as well as for siblings and stepsiblings of students at the Charter School, and students of essential staff and founders. In the Admissions Policy, it states that all of these students would be exempted from the lottery (p. 6, Revised Attachment 25), while in the Narrative, the Applicant states that 8th graders at GLACS and GLASW would receive preference in the lottery (p. 64, Revised Narrative).</i></p> <p><i>Apply Philly Charter is mentioned by name in the Narrative but does not appear in Revised Attachment 25. According to Revised Attachment 25,</i></p> <p><i>Global Leadership Academy International Charter High School will conduct the lottery for each grade through an independent third-party solution. A computerized generated algorithm will produce a randomized list of applicants. The algorithm considers that certain applicants are accorded preference (i.e., siblings, students of essential staff, and 9th grade applicants from Global Leadership Academy Charter School and Global Leadership Academy Charter School Southwest at Huey) above the general population of applicants. The third-party solution audits the lottery and waitlist management process. Once the lottery is run, applicants who have been accepted will be able to log into the password-protected portal to begin the enrollment process. This third-party solution will be directly integrated with the Charter School's Student Information System, and will continue to document the process of each accepted student's enrollment. (p. 7, Revised Attachment 25)</i></p> <p><i>The Applicant does not make it clear what happens if there are more 8th graders applying from GLACS and GLASW in a given year than there are seats at GLAICHS.</i></p> <p><i>The Applicant affirms its commitment to the principle of equal opportunity in education and states that it will not deny enrollment or admission on any basis otherwise illegal for a school district (p. 15, Revised Attachment 25).</i></p>
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<p>ENROLLMENT (Narrative and Attachment 25)</p>	<p>Minor changes were identified in the enrollment section of the Revised Application for the proposed Charter School. The Narrative now indicates that the School Operations Manager will be responsible for entering data into Infinite Campus. In the description of Student Enrollment Packet, references to "Global Academies" were changed to "Global Leadership Academy International Charter High School" (p. 23, Revised Attachment 25).</p> <p>The Original Evaluation Report states:</p> <p><i>The Applicant describes an intent to register form that requires the following items:</i></p> <ul style="list-style-type: none"> <i>i. Student name, address, date of birth and/or age, gender, grade applying for, and current grade;</i> <i>ii. Parent or legal guardian name, relationship to student, relationship to Global Leadership Academy International Charter High School if applicable, and contact information;</i> <i>iii. Sibling name(s), school, and grade; and</i> <i>iv. Specific admissions criteria questions, if outlined in the school's charter. (p. 4, Revised Attachment 25)</i> <p><i>The intent to register form would be available in English and Spanish and will be available in other languages if commonly spoken by members of the school community. The link to the online application and online portal is accessed through the website. However, the intent to register form (in all languages) also can be accessed or retrieved in the following ways: 1. Online 2. In person 3. Downloaded from the school website 4. Email 5. Mail 6. Fax, and school staff is also willing to help families complete the application online. The intent to register form that a student would fill out when applying is not differentiated from an enrollment packet that would typically be submitted after a student is selected in the lottery.</i></p> <p><i>If a student is applying for a grade other than Grade 9, the proposed Charter School would determine their eligibility based on what they passed in the previous school year.</i></p>
<p>Student Discipline, Code of Conduct, and Due Process</p>	
<p>STUDENT DISCIPLINE AND CODE OF CONDUCT (Narrative and Attachment 26)</p>	<p>The Revised Application for the proposed Charter School includes significant revisions to the student discipline and code of conduct section. The classification of conduct violations, with the levels of infractions coded as Level I, Level II, or Level III (pp. 20-25, Revised Attachment 26), now identifies clear consequences, including possible instances of suspensions and expulsions, for each level. The Code of Conduct also includes significant revisions including both rehabilitative and reasonably punitive consequences reasonably. The proposed Charter School has considered the potential impact of policies, removing "eating in class" as a violation of any kind.</p> <p>The proposed Charter School identifies that "Scholars and their parents/guardians should be knowledgeable of School and classroom rules (p. 6, Revised Attachment 26)." However, there is no explicit plan to communicate expectations to families or students before possible violations occur.</p> <p>The Applicant states that the intent of the proposed school's anti-bullying policy includes "incidents that are reasonably perceived as being motivated either by any actual or perceived characteristic, such as gender, age, race, color, sexual orientation (known or perceived), gender identity expression, national origin, religion, disability, socioeconomic status, and/or political beliefs" (p. 36, Revised Attachment 26).</p>

INCLUSIVE SCHOOL CULTURE	<p>Minor changes regarding inclusive school culture were identified in this section of the Revised Application for the proposed Charter School. The Applicant mentions prohibiting behaviors of bullying, harassment, or discrimination based on known or perceived sexual orientation or known or perceived gender expression (pp. 32-33, Revised Attachment 26). No policy mentions respect for pronouns and names, nor guidance for spaces and activities separated by gender.</p> <p>The Original Report states:</p> <p><i>The Applicant establishes respect for gender expression and identity and plans to adopt a universal policy regarding uniforms within the school. Nothing in the Dress Code restricts or bans a scholar from wearing religious garb (p. 42, Revised Attachment 26).</i></p>
DUE PROCESS	<p>Minor changes were identified in the section regarding who will be responsible for governing the discipline of students with special needs.</p> <p>The Applicant states,</p> <p>GLAICHHS's special services coordinator, who is part of the administrative team, will be responsible for ensuring compliance with respect to federal laws and regulations governing the discipline of scholars with disabilities, including manifestation determination reviews. GLAICHHS's special services coordinator and school psychologist will be responsible for conducting and documenting manifestation determinations. (p. 67, Revised Narrative)</p> <p>The special services coordinator is not included on the proposed school's Year 1 organizational chart (p. 2, Revised Attachment 8), yet is mentioned as a member of the leadership team (pp. 7-8, Revised Attachment 19).</p>
REVISING THE CODE OF CONDUCT	<p>The Revised Application for the proposed Charter School includes significant revisions to the section of the Original Application regarding the process for revising the Code of Conduct.</p> <p>The Applicant states,</p> <p>The Code of Conduct will be reviewed annually. The Board will review scholar discipline via monthly reports by the administration, which will include data analysis concerning any disproportionate impact on scholars of color, EL scholars, and scholars with disabilities. To the extent that revisions are made to the Code of Conduct during the school year, GLAICHHS will ensure that the changes are promulgated to the school community after being approved by the Board at a public meeting, per the Sunshine Act. Any changes will be disseminated via email, during parent town hall meetings, newsletters, or various other methods of communication. (p. 67, Revised Narrative)</p> <p>The Applicant describes town hall meetings as a time for parent, guardian, family, and students to provide "feedback valued as a true stakeholder" (p. 42, Revised Narrative). The Applicant describes that school grievances can be communicated directly to the school administration at any given time during the school year, while monthly virtual town hall meetings and public school board meetings will allow for regular informal review and revisions to the code conduct, if necessary.</p>
ATTENDANCE AND TRUANCY RECORD KEEPING	<p>The Revised Application for the proposed Charter School includes significant revisions to the section of the Original Application regarding attendance tracking and recording, compulsory education and attendance, and truancy policy and program description.</p>

<p><i>(Narrative and Attachment 27)</i></p>	<p>Teachers are responsible for taking daily attendance, and the operations manager will serve as the point of contact for attendance data collection and parent and guardian correspondence as needed (p. 3, Revised Attachment 27). This position is designated on the Year 1 organization chart (p. 1, Revised Attachment 8). The Applicant states that schooling is required for students between the ages of 6 and 17 in accordance with the truancy policy outlined by the PDE (p. 1, Revised Attachment 27).</p> <p>The school includes a detailed description of truancy notification, levels of consequences, and improvement measures (pp. 5-8, Revised Attachment 27), and requires an "Attendance Improvement Conference" meeting to take place after the sixth consecutive unexcused absence (p. 10, Revised Attachment 27). The Applicant states that it will not permit exclusionary discipline and that the school "will not expel, suspend, reassign, or transfer a student for truancy (p. 11, Revised Attachment 27).</p>
<p>School Safety Plan</p>	
<p>SCHOOL SAFETY <i>(Narrative and Attachment 28)</i></p>	<p>Significant changes were identified in the school safety area of the Revised Application compared to the Original Application, including updates to the organizational chart and school safety plan.</p> <p>The proposed Charter School will appoint a school safety and security coordinator, as well as a CEO-appointed "threat assessment team" to coordinate, train, and lead school safety plans (p. 2, Revised Attachment 8). The safety plan designates the Assistant Head of the School as responsible for conducting school-wide periodic emergency drills (Revised Attachment 28, p. 12) and this position is listed on the proposed school's Year 1 organization chart.</p> <p>The Applicant states that "Act 44 Safe2Say requirements will be included in the safety plan" (p. 62, Revised Narrative), noting specific drills in both the Revised Narrative (p. 68) and Revised Safety Plan (p. 10-11), including active shooting drills if needed as well as "reporting weapons incidents."</p> <p>The Applicant plans for three evacuation drills, one severe weather/shelter-in-place drill, and one bus evacuation drill, as well as monthly fire drills throughout the course of the school year (pp. 10-11, Revised Attachment 28), with school-wide systems and responsible parties identified (pp. 15-22, Revised Attachment 28).</p> <p>There is no mention of submitting an annual violence or crimes report.</p> <p>Although the bullying policy is not mentioned as part of the proposed school's safety plan, it is laid out within the proposed Charter School's Revised Code of Conduct (Attachment 26, Section 11) and Revised Narrative (pp. 41-42, 66).</p>
<p>Insurance Coverage</p>	
<p>INSURANCE COVERAGE <i>(Narrative and Attachment 29)</i></p>	<p>A minor change was identified in the insurance area of the Revised Application; the Applicant explained why the insurance price quote and the budgeted amount differ, stating,</p> <p>Insurance quotes are open to negotiation and are marketed to multiple carriers for the lowest possible coverage. GLAICHS has budgeted \$25,000 due to the low personnel numbers and lower amount of personal property that will exist in the first year of the charter term. GLAICHS will operate within its budget but notes again that budgets are a living document subject to change based on circumstances. (p. 21, Adjudication, Response and Resubmissions)</p>

	<p>The Original Evaluation states:</p> <p><i>Revised Attachment 29 provides a quote from Sovereign Insurance Group for property and casualty insurance. It includes coverage for commercial general liability (including contractual liability), automobile liability, workers' compensation and employers' liability, excess/umbrella liability, professional liability/educators' liability/ malpractice/errors and omissions insurance, and Directors and Officers liability and employment practices liability. The policy notes, "The Charter School shall obtain a sexual molestation and child abuse endorsement" (p. 2, Revised Attachment 29). It is not clear whether a sexual molestation and child abuse endorsement has been obtained by the Charter School. It is not clear if it contains any exclusions or occurrence limits. A sexual molestation and child abuse endorsement does not appear to be included in the quoted coverage amount. The quote is for \$40,036 and the budget has allocated \$25,000.00 in Year 1.</i></p>
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COMMUNITY ENGAGEMENT, SUPPORT, AND IMPACT	
<p>This section details the partnerships and community connections that the applicant has established as part of engaging with students and families, including students in any specific demographic groups.</p>	
STANDARD	FINDINGS
Target Community	
TARGET COMMUNITY NEEDS	<p>No substantive changes were identified in this area of the Revised Application. The Original Evaluation states:</p> <p><i>The proposed Charter School "intends to serve scholars throughout the entire City of Philadelphia, with a preference for scholars currently attending GLACS or GLASW" (pp. 70-71, Revised Narrative).</i></p> <p><i>The Applicant included a map showing that the students at these related Charter Schools in West Philadelphia "come from almost every zip code in Philadelphia. It is expected that GLAICHHS will have the same city-wide draw" (p. 71, Revised Narrative).</i></p> <p><i>The Applicant lists existing schools serving Grades 9-12 in the "five under-resourced zip codes from which the high school expects to draw scholars," which are 19131, 19139, 19143, 19140, and 19141. Schools in these zip codes are listed because the majority of GLACS and GLASW scholars live in zip codes 19131, 19139, 19143, and the zip codes surrounding the proposed high school location are 19140 and 19141 (p. 71, Narrative). The Applicant calls the proposed Charter School "a new educational opportunity distinct from the existing schools currently available to youth" (p. 71, Revised Narrative), but did not describe how existing options are not being successful.</i></p> <p><i>The proposed Charter School aims to provide "nonselective neighborhood high school options" (p. 64, Revised Narrative), and increased access to education with a global theme.</i></p> <p><i>There is only one fully realized international studies high school city-wide: Bodine High School for International Affairs. However, Bodine is a criteria-based school. GLAICHHS will provide a school option with an international studies education for all students – even those with special and academic needs who may not be admitted to a criteria-based high school. (p. 3, Revised Narrative)</i></p>

LOCAL RESIDENT AND STAKEHOLDERS' NEEDS AND PRIORITIES	<p>The Revised Application for the proposed Charter School includes significant revisions to the Original Application in this section about local residents and stakeholders' needs and priorities.</p> <p>According to the Applicant, multiple meetings were conducted to understand the needs and priorities of residents and stakeholders; among these priorities are safe travel to and from school, as well as athletics and arts programming. Included in the Revised Application's Attachment 46 is a sign-in sheet from a community meeting held on April 5, 2023 containing 41 signatures from local residents, people associated with the nearby Our Lady of Hope Parish, and others. The Revised Application states, "Stakeholders expressed opinions and questions regarding scholar safety while traveling to and from school and while at school, whether sports that could lead to college scholarship offers will be offered, and whether GLAICHS will offer a fully rounded arts program to complement the academic planning. These questions were addressed by the applicant team" (p. 72, Revised Narrative). However, the responses given by the applicant team were not included in this section.</p>
COMMUNITY PARTNERSHIPS <i>(Narrative and Attachment 30)</i>	<p>Minor changes were identified in this section of the Revised Application, specifically the addition of the following information regarding costs and transportation associated with community partnerships: "In most cases, workshops and programming from partner organizations will be offered at no cost. There may be some programming that requires a fee, which will be negotiated once a charter is approved" (p. 73, Revised Narrative). Additionally, the Revised Narrative states, "Scholars will use SEPTA Student Fare Cards to travel to and from most of these activities; in some cases, buses for extracurriculars and field trips will be secured in alignment with District guidelines regarding distance, grade level, etc." (p. 39, Revised Narrative). However, information regarding the staffing for these community partnerships is still not present.</p> <p>The Original Evaluation States:</p> <p><i>Numerous community partners and supporters are listed in the various sections of the Application.</i></p> <p><i>The Narrative includes a list of community partners and the following entities also provided letters of support: Pennsylvania Jobs for America's Graduates, Be More Excellent, Cramer's Uniforms, WE Reign, Legacy Bridges STEM Academy, Bushfire Theater, American Women's Heritage Society, and The Mann Center (p. 72-73, Revised Narrative, Revised Attachment 30, and Revised Attachment 31).</i></p> <p><i>Revised Attachment 31 also includes a letter from Imperial Dade food service and the first page of a letter from Villanova University College of Engineering, neither of which are mentioned in the Narrative.</i></p> <p><i>As described above in reference to extracurricular activities, Revised Attachment 30 includes MOUs and letters from partner organizations. Potential partnerships are relevant to the proposed mission and focus on "Global Competence, Real-World Learning, and Leadership Development" (p. 1, Revised Narrative), and include organizations focused on music education, STEM learning opportunities, broadcast journalism, public speaking, urban gardening, and girls' empowerment.</i></p>
COMMUNITY SUPPORT <i>(Narrative and Attachment 31)</i>	<p>The Revised Application for the proposed Charter School includes additions to the Original Application in regards to community support. Revised Attachments 31 and 45 contain additional documentation of community support:</p>

- 1 letter of support from a member of Our Lady of Hope Parish
- 7 letters of support from GLACS and GLASW staff
- 1 letter of support from a GLACS student
- 1 letter of support from a GLACS parent
- 41 signatures on a community meeting sign-in sheet from an April 5, 2023 Open House
- 13 letters of support signed at the April 5, 2023 event

The following information from the Original Evaluation Addendum is still relevant:

The Applicant submitted numerous letters and documents demonstrating stakeholder enthusiasm for the proposed Charter School:

- 80 letters of support from GLACS and GLASW students
- 73 letters of support from GLACS and GLASW staff
- 29 letters of support from parents and family members of students at GLACS and GLASW
- 4 letters of support from GLACS and GLASW alumni
- 11 testimonial quotes from GLACS and GLASW alumni
- 2 biographical descriptions of GLACS and GLASW alumni
- 19 signatures on a petition supporting the proposed Charter School
- 15 signatures on a community meeting sign-in sheet
- 24 signatures on a high school parent committee meeting sign-in sheet

Videos of five student interviews and a student focus group were also provided, with students discussing their positive experiences at GLACS and GLASW and their support for the idea of a high school. Students discussed feeling safe and welcomed, though several stated that they would also like to explore other high school options to have new experiences or a “fresh start.” Video interviews were also submitted from three family members and one staff member who is also an alumna and a parent.

Letters from the following community leaders expressing their support for the high school expansion or Application were provided in Revised Attachment 31:

- State Representative Amen Brown
- State Representative Morgan Cephas
- State Senator Anthony H. Williams
- State Senator Vincent J. Hughes
- City Councilmember Curtis Jones
- Greg Spearman of the 60th Ward Democratic Executive Committee
- Willie Jordan of the 44th Ward Democratic Executive Committee
- Lucinda Hudson of the Parkside Association of Philadelphia

Two letters from City Councilmember Katherine Gilmore Richardson were also attached, but were in reference to a recent speaking engagement at GLACS and constituent services more generally.

There is another attachment, labeled as Revised Attachment 44, that is not requested as part of the Application Guidelines. Revised Attachment 44 is called “Founders and Supporters,” and is a nine-page chart listing individuals and organizations and describing their areas of expertise related to the “operational, governance, financial, and facilities of the proposed

	<p><i>Charter School” (p. 2, Attachment 44). Founders and other supporters are listed, but no letters are provided in Attachment 44 to document the nature or extent of their involvement.</i></p> <p><i>A letter dated November 3, 2022 was submitted along with the Fact Sheet attachment from one person listed in Revised Attachment 44, Stephanie Malia Krauss, author of the 2021 book “Making It: What Today’s Kids Need for Tomorrow’s World,” who met with the founders as they developed the Application.</i></p> <p><i>Unlabeled photos in Revised Attachment 30 include individuals who are civic leaders in Philadelphia but their involvement in or affiliation with the proposed Charter School is unclear.</i></p> <p><i>Some of the Applicant’s letters of support reference Legacy Pathways Legacy-Bridges STEM Academy, rather than the proposed Charter School (Revised Attachment 30). Information was also provided regarding Pennsylvania Next Generation Sector Partnerships and from Festo Advanced Automation curriculum, but their connection to the Application is unclear.</i></p>
<p>DEMAND FROM PARENTS, GUARDIANS, AND FAMILIES <i>(Narrative and Attachment 32)</i></p>	<p>The Revised Application for the proposed Charter School includes significant revisions to the Original Application as it pertains to demand from parents, guardians, and families, with a total of 72 eligible intent to enroll forms submitted for the 150 seats in Year 1, representing 48% of seats.</p> <p>Revised Attachment 32 includes 365 additional intent to enroll forms for the proposed Charter School. Of these 365 forms, seven list zip codes outside of Philadelphia, 256 list students that would be too young to enroll for the 2023-24 school year (i.e., these scholars would not be in Grade 9 for that school year), one form lists a scholar who will be in Grade 10 for the 2023-24 school year, and 54 forms are duplicates of intent to enroll forms submitted as part of the Original Application.</p> <p>The Original Application included 299 intent to enroll forms; a large majority of these forms are on behalf of students who are too young to enroll in the proposed Charter School in Year 1 of operation, but 25 of those intent to enroll forms are for students eligible to enroll in the 2023-24 school year.</p> <p>The Revised Application includes 47 unique and eligible intent to enroll forms; when combined with the 25 eligible intent to enroll forms submitted in the Original Application, these 72 eligible intent to enroll forms represent 48% of the 150 seats to be filled in 2023-24.</p> <p>The Revised Application states,</p> <p style="padding-left: 40px;">This application is built upon the desire of scholars currently attending GLACS and GLASW, and their families, to continue their school career in the same global educational program. It is true that these scholars will benefit from continuing with this model; research shows that programmatic continuity eliminates what are known as on- and off-ramp learning losses, and helps youth stay connected to their high schools (p. 72, Revised Narrative).</p> <p>According to data in Infinite Campus, 80 students are currently in Grade 8 at GLACS and 54 students are in Grade 8 at GLASW. If all of these students enrolled in Grade 9 at the proposed Charter School, seats would remain available to students attending Grade 8 elsewhere.</p> <p>According to the cover letter submitted with the Revised Application, GLACS and GLASW’s waitlists contain a combined 228 scholars in Grade 8, and a total of 3,621 scholars (p. 2, Attachment 0). However, waitlists from other schools are not considered acceptable means of demonstrating support.</p>

Student Demographics	
ANTICIPATED STUDENT POPULATION	<p>No substantive changes were identified in this area of the Revised Application. The Original Evaluation states:</p> <p><i>The Applicant expects the proposed Charter School's demographics to be similar to the demographics of</i></p> <p><i>The scholars currently attending GLACS and GLASW: 95-100% minority, 95-98 % African American or Black, with the remaining scholars identifying as multiracial, Latino/ Hispanic, or Asian. The school expects to serve a Special Education population of 20%, equal to the District's percentage. Mirroring the EL demographics of GLACS and GLASW, the school does not anticipate a large number of EL scholars but will of course serve those who enroll. Based on circumstances of GLACS and GLASW families, the school expects approximately 80% of scholars will be economically disadvantaged. (p. 74, Revised Narrative)</i></p>
RECRUITMENT AND MARKETING	<p>Minor changes were identified in this section of the Revised Application for the proposed Charter School in the recruitment and marketing section. The Revised Application states, "These methods of outreach apply equally to families in poverty, students with disabilities, and other at-risk students. Radio, newspaper, and social media outreach will be provided in other languages to reach non-English speaking families" (p. 75, Revised Narrative).</p> <p>The Original Evaluation states:</p> <p><i>The Applicant proposes to "do outreach through radio, newspaper, social media to recruit prospective scholars and their families" (p. 74, Revised Narrative) along with posting flyers, mailing recruitment information, and advertising on public transportation. The Applicant proposes to concentrate on West Philadelphia, as well as neighborhoods surrounding the proposed Charter School. In addition, the Applicant plans to "connect with nonprofits and community organizations to assist in prospective scholar recruitment" (p. 75, Revised Narrative).</i></p>
Parent, Guardian, Family, and Community Engagement	
ROLE IN SCHOOL DEVELOPMENT	<p>Minor changes were identified in this section of the Revised Application for the proposed Charter School in this section, including a statement that "Parents and families continue to be involved in the school's development through written support to the School District, social media, and town hall meetings, amongst other communication" (p. 76, Revised Narrative).</p>
ENGAGEMENT WITH THE SCHOOL (Narrative and Attachment 33)	<p>Minor changes were identified in this section of the Revised Application for the proposed Charter School in this section. The Revised Application states, "All non-English speaking parents/guardians will receive all documentation translated into their native language, and interpretation services will be engaged if they are needed; the service will provide a translator fluent in the required language" (p. 76, Revised Narrative).</p> <p>The Original Evaluation states:</p> <p><i>The Applicant has identified parent engagement as "seeing families as partners" (p. 73, Revised Narrative) and "vital to GLAICH's success and the success of its scholars" (p. 76, Revised Narrative).</i></p> <p><i>The Applicant's parent engagement strategy includes disseminating information through flyers, newsletters, social media posts, phone calls, text messages, emails, and a parent and guardian portal and hub on the school website. The Applicant also plans to reach the</i></p>

	<p><i>hardest-to-reach families by conducting home visits on a needed basis.</i></p> <p><i>The proposed Charter School would communicate regarding data and progress through informal reports each quarter, full report cards twice a year, student and parent or guardian-teacher conferences twice a year. The Applicant mentions school-wide engagement through the use of monthly meetings and parent support seminars, satisfaction surveys, monthly public board meetings, and the designation of a seat on the Board for a parent or guardian.</i></p> <p><i>The Applicant requires that all formal complaints on behalf of students, parents, and/or staff must include a written statement to the CEO/Head of School (pp. 15-22, Revised Attachment 33) unless the complaint is against the CEO/Head of School, in which case complaints can be submitted directly to the Board of Trustees. The Applicant did not designate the method by which written complaints can be submitted (i.e., electronically or in paper form). The Applicant also requires that formal complaints are followed with a meeting within five days of initial submission. However, the Applicant also did not give guidance regarding when these meetings can take place (e.g., before or after school hours).</i></p>
<p>COMMUNICATION OF SCHOOL-WIDE DATA TO PARENTS, GUARDIANS, AND STAKEHOLDERS</p>	<p>Minor changes were identified in this section of the Revised Application for the proposed Charter School. As cited above, the Revised Application states, "All non-English speaking parents/guardians will receive all documentation translated into their native language, and interpretation services will be engaged if they are needed; the service will provide a translator fluent in the required language" (p. 76, Revised Narrative).</p> <p>The Original Evaluation states:</p> <p><i>The Applicant states that the proposed Charter School would share performance data with community members, staff, and stakeholders through progress reports, monthly staff meetings, school-wide meetings, the website, and through report cards and conferences (p. 77, Revised Narrative).</i></p>

FINANCE	
<p>This section details financial policies and procedures and demonstrates, under realistic revenue and expenditure assumptions, that the proposed Charter School will remain financially viable for the entire charter term. The proposed budget should align fully with proposed programming, staffing plans, student enrollment projections, and all other aspects of the proposed Charter School.</p>	
STANDARD	FINDINGS
Finance and Operations	
<p>FIVE-YEAR OPERATING BUDGET <i>(Attachment 34)</i></p>	<p>Minor changes were identified in the budget provided in Revised Attachment 34 and the Revised Narrative section about the operating budget in comparison to the Original Application. The Applicant added the following statement to the Narrative: "The budget is a living document, and an appropriate and suitable budget for a charter school has been provided at Attachment 34" (p. 78, Revised Narrative).</p> <p>Revenues:</p> <p>The Applicant includes \$250,000 in revenues for Year 0 (Line 14, Revised Attachment 34). The Revised Narrative states,</p> <p>In order to support the organization in Year 0 and pay any needed salaries until a subsidy is received, the school is forecasting a \$250,000 line of credit from Global</p>



	<p>Foundation. No other major fundraising is projected, though the school has plans to solicit funds from individual donors and apply for start-up grants with charter school foundations. (p. 78, Revised Narrative)</p> <p>While there is an unsigned draft revolving credit agreement (Revised Attachment 35),the Applicant does not provide evidence that Global Foundation has sufficient funds to provide \$250,000 in Year 0.</p> <p>The Applicant budgets for \$25,000 in Contributions/Donations/Grants with that figure rising 3 percent each year through Year 5. In the response document in Attachment 0, the Applicant states that the amount is “based on the founders [sic] and supporters [sic] impressive history of fundraising” (p. 23, Adjudication, Response and Resubmissions).</p> <p>The Applicant budgets for revenues that assume 100 percent enrollment is maintained from the first day school opens and throughout the five years of what is presented within this Application. These presumptions may be overly optimistic. If enrollment is only 98 percent of what is budgeted, or 3 students in Year 1, 6 students in Year 2, and 9 students in Year 3, a failure to realize those revenues alone would lead to budget deficits in Years 1 through 3.</p> <p>Expenditures:</p> <p>The Applicant states that employees will automatically be enrolled in a PSERS alternative 403(b) plan. (p. 63, Revised Narrative), and the employer cost of five percent of salaries is budgeted for the 403(b) plan.</p> <p>The Applicant includes an estimate for insurance costs that totals \$40,036 (p. 3, Attachment 29); however, the Year 1 budget only budgets \$25,000 (line 128, Attachment 34). The difference in these two amounts exceeds the budgeted surplus for Year 1. The Applicant explains, “Insurance quotes are open to negotiation and are marketed to multiple carriers for the lowest possible coverage. GLAICHS has budgeted \$25,000 due to low personnel numbers and lower amount of personal property that will exist in the first year of the charter term” (p. 21, Adjudication, Response and Resubmissions).</p> <p>The Applicant states that it will contract for EL Teachers (Revised Attachment 8 and p. 13, Revised Narrative), but there is no budgeted expenditure for contracted services for EL Teachers. The Applicant explains, “the ESL teachers are included in the special education contracted services” (p. 18, Adjudication, Response and Resubmissions).</p>
BUDGET FLEXIBILITY	<p>No substantive changes were identified in this area of the Revised Application. The Original Evaluation states:</p> <p><i>The Applicant does not explain flexibility in its budget, and the budget as presented will likely lead to deficits in at least Years 1 through 3.</i></p>

ADDITIONAL FINANCIAL SUPPORT <i>(Narrative and Attachment 35)</i>	<p>A minor change was identified in the Revised Attachment 35, including a change to Article 1 stating that the proposed Charter School would not need to pay off the line of credit until reaching 45 days cash on hand, or Year 4, whichever comes first.</p> <p>The Applicant budgets at least \$25,000 per year in Contributions/Donations/Grants from Private Sources (line 14, Revised Attachment 34), but provides no details regarding how it intends to raise these revenues. Further, the Applicant budgets for \$250,000 in Year 0 in the "Contributions/Donations/Grants" line, but the only documentation provided is a draft agreement with Global Foundation for a revolving line of credit. There is no evidence provided that Global Foundation has the funds available to provide this line of credit (Revised Attachment 35).</p>
SUPPORTING FOUNDATIONS	<p>No substantive changes were identified in this area of the Revised Application. The Original Evaluation states:</p> <p><i>The Applicant states that it "does not intend to create a supporting foundation at this time" (p. 78, Revised Narrative).</i></p>
Financial Policies and Procedures	
GAAP COMPLIANCE	<p>No substantive changes were identified in this area of the Revised Application. The Original Evaluation states:</p> <p><i>The Applicant includes its proposed business and finance policies and procedures as Revised Attachment 36. The policies provide sufficient detail, identify specific roles and responsibilities, and, if followed, can realistically be expected to ensure proper use of public funds.</i></p>
MONITORING FISCAL HEALTH	<p>No substantive changes were identified in this area of the Revised Application. The Original Evaluation states:</p> <p><i>The Applicant adequately defines the financial metrics that will be used to monitor fiscal health, describes the nature and frequency of financial information provided to the Board, and outlines a clear budget approval process (Revised Attachment 36 and pp. 78-80, Revised Narrative).</i></p>
TRAINING FOR BOARD MEMEBERS	<p>No substantive changes were identified in this area of the Revised Application. The Original Evaluation states:</p> <p><i>The Applicant includes a plan to train Board members in GAAP and sound fiscal management via an annual training provided by the business office, legal team, and Global Academies (p. 79, Revised Narrative).</i></p>
ACCOUNTABILITY FOR FISCAL MANAGEMENT AND FINANCIAL SUSTAINABILITY <i>(Narrative and Attachment 36)</i>	<p>No substantive changes were identified in this area of the Revised Application. The Original Evaluation states:</p> <p><i>The Applicant states that the Board will use information from monthly reports and annual training to evaluate the school business company, and principal/CEO, but does not describe how it will hold those parties accountable (Revised Narrative, p. 79)</i></p>
Fiscal Management	
KEY RESPONSIBILITIES	<p>No substantive changes were identified in this area of the Revised Application. The Original Evaluation states:</p>

	<i>The Applicant identifies Santilli & Thomson as its contracted financial management services provider (pp. 50-51, Narrative), and a draft business management between the Applicant and Santilli & Thomson is provided in Revised Attachment 14.</i>
INDEPENDENT AUDITS	<p>No substantive changes were identified in this area of the Revised Application. The Original Evaluation states:</p> <p><i>The Applicant states that a yearly audit will be conducted (p. 48, Revised Narrative), but does not include a plan to ensure timely completion.</i></p>
Evidence of Fiscal Solvency (if the applicant currently manages one or more schools)	
SCOPE AND COSTS OF SERVICES (Narrative, Attachment 37, and Attachment 38)	<p>No substantive changes were identified in this area of the Revised Application. The Original Evaluation states:</p> <p><i>The Applicant states, "GLAICHHS, an independent 501(c)(3) not-for-profit corporation organized as a charter school, is not currently operating or managing brick-and-mortar charter schools within Philadelphia" (p. 82, Revised Narrative). The Applicant repeatedly references Global Academies, GLACS, and GLASW and the founding coalition of the Applicant is comprised in part of Global Academies, GLACS and GLASW current and former directors, officers, teachers, staff, employees, stakeholders, and Board of Trustees members. (Revised Attachment 5). While the Applicant itself may not be operating or managing charter schools, it is integrally connected with GLACS and GLASW, two operating charter schools, and expects to receive services from and have a licensing arrangement with Global Academies.</i></p>

FACILITIES	
<p>This section describes the school's ability to secure, prepare, and maintain a suitable facility within the allotted time frame. The proposed facility should be suitable for the educational programming proposed by the applicant, including special needs for instruction, administrative and support services, and physical education or athletic spaces.</p>	
STANDARD	FINDINGS
Facility Sustainability	
FACILITY (Narrative and Attachments 39 and 40)	<p>No substantive changes were identified in this area of the Revised Application. The Original Evaluation states:</p> <p><i>The building identified to be utilized by the Applicant was formerly used by Cristo Rey High School at 510-18 North Broad Street" (p. 80, Revised Narrative). The building is owned by Our Lady of Hope Parish in conjunction with the Archdiocese of Philadelphia. The facility is suitable for the proposed grades and enrollment at-scale. The space is 52,230 square feet between an old and new building. The lease proposal states "Premises shall be 26,260 RSF consisting of the "New" Building. Optioned Premises shall be an additional 26,615 RSF consisting of the "Old" Building, including first floor social hall and all connecting appurtenance between them" (p. 4, Revised Attachment 41). The Lease proposal stated the Tenant shall have access to the building starting January 1, 2023 (p. 4, Revised Attachment 41).</i></p> <p><i>The Applicant also states, "The school does intend to purchase or build a permanent facility in the future; there are no concrete or existing plans to do so at the time of this application. GLAICHHS's intent to eventually own its own facility is general and tentative" (p. 80, Revised Narrative).</i></p>

LOCATION	<p>No substantive changes were identified in this area of the Revised Application. The Original Evaluation states:</p> <p><i>The location for the proposed Charter School is 5210-18 North Broad Street Philadelphia, PA 19141 which was formerly Cristo Rey High School until 2019. The Applicant notes that the proposed location is conveniently located near the Olney Transportation Center, making access for scholars easy via public transportation (p. 80, Revised Narrative).</i></p> <p><i>At community meetings related to the proposed Charter School, stakeholders “expressed opinions and questions regarding scholar safety while traveling to and from school” (p. 72, Revised Narrative). The Applicant states, “Buildings will be secured by onsite security, as well as by cameras placed throughout and outside the building. GLAICHS will encompass the safe corridor program for scholars to safely enter, exit, and move about the building before, during, and after the school day” (p. 72, Revised Narrative).</i></p>
FINANCING (Narrative and Attachment 41)	<p>No substantive changes were identified in this area of the Revised Application. The Original Evaluation states:</p> <p><i>The owner of the proposed building is Our Lady of Hope Parish. The Applicant will have access to the building starting on January 1, 2023. The lease proposal states the lease terms are for five years, expiring on June 30, 2028 (p. 4, Revised Attachment 41). Although the Applicant stated the building contains 52,230 square feet, the Applicant is only using 26,260 square feet in Year 1 based on the rental rate (\$7.00 per SF) for the first year plus real estate taxes (\$.14 per RSF), building insurance (\$.59 per RSF) and operating expenses (\$3.04 per RSF) which aligns with the budget (p. 5, Revised Attachment 41). The rent increases to \$10 per SF in Year 2 with an increase of 3 percent per year thereafter. The amount budgeted for rent does increase over the five years. The budget was submitted as a PDF and as an Excel document as requested. The Excel version of the budget shows the square footage utilized each year and how the increasing cost per square foot were used to calculate the annual rental expense which aligns with the Revised Attachment 41.</i></p> <p><i>Per the lease proposal, the tenant does have the ability to exercise its right to use less than 52,230 square feet. The lease proposal states, “Premises shall be 26,260 RSF consisting of the “New” Building. Optioned Premises shall be an additional 26,615 RSF consisting of the “Old” Building, including first floor social hall and all connecting appurtenance between them. Tenant may exercise its option for less than the full size of the Optioned Premises” (p. 4, Revised Attachment 41). The lease proposal was signed by a representative of the Applicant on November 10, 2022. The document is also signed by a representative of the Landlord, but that individual did not date the document (p. 6, Revised Attachment 41).</i></p>
EXPECTED RENOVATIONS (Narrative and Attachment 41)	<p>No substantive changes were identified in this area of the Revised Application. The Original Evaluation states:</p> <p><i>The Applicant does not require major renovations at the proposed location. The Applicant states, “Minor renovations may be needed, but the current landlord and previous tenant have made numerous capital improvements to the building since 2012, so the school does not anticipate any necessary major renovation in order to open in Fall 2023” (p. 81, Revised Narrative). The Applicant provided a list of improvements that the previous tenant, Cristo Rey Philadelphia High School, made starting in 2012 (p. 5, Revised Attachment 40).</i></p>
FACILITIES MAINTENANCE	<p>No substantive changes were identified in this area of the Revised Application. The Original Evaluation states:</p> <p><i>The Applicant is responsible for the cleaning and trash removing within the building, while the Landlord is responsible for the maintenance and repairs to roofs, sidewalks, foundations and</i></p>

	<p><i>building structural elements during the primary term of the lease and extensions (p. 5, Revised Attachment 41). The Narrative states that the Applicant is responsible for repairs, renovations, and capital improvements (p. 81, Revised Narrative), and the budget reflects reasonable maintenance expenditures throughout the charter term. Under the lease proposal, the charge for operating expenses is \$3.04 per RSF (p. 5, Revised Attachment 41).</i></p>
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EXISTING OPERATOR	
<p>This section should be completed by: (i) Applicants supported by an incubation/launch partner, (ii) Applicants that operate or manage a currently existing or former school in any state, or (iii) Applicants that propose to use a Charter Management Organization (CMO), Educational Services Provider (ESP), or similar entity that currently operates or manages or has formerly operated or managed a school in any state.</p>	
STANDARD	FINDINGS
Historical Trends of the Existing Operator	
<p>TRACK RECORD OF SUCCESSFUL OUTCOMES AND COMPLIANCE <i>(Narrative and Attachment 42)</i></p>	<p>Minor changes were identified in this section of the Revised Application for the proposed Charter School, primarily additional explanations of the reasons why the Applicant does not consider itself to be an Existing Operator.</p> <p>The Applicant states,</p> <p style="padding-left: 40px;">The applicant, GLAICHHS, an independent 501(c)(3) not-for-profit corporation organized as a charter school, is not currently operating or managing brick-and-mortar charter schools within Philadelphia. The use of data from unrelated schools serving grades other than those proposed by the Applicant should not be used to judge this applicant’s school model. The only factors that should be used to evaluate a charter application are those listed in 24 P.S. 17-1719-A. (p. 82, Revised Narrative)</p> <p>Throughout the Application, however, the Applicant repeatedly references Global Academies, GLACS, and GLASW. Additionally, the founding coalition of the Applicant is comprised in part of Global Academies, GLACS and GLASW current and former directors, officers, teachers, staff, employees, stakeholders, and Board of Trustees members (Revised Attachment 5). While the Applicant itself may not be directly operating or managing other charter schools, it is integrally connected with GLACS and GLASW, two operating charter schools, and expects to receive services from and have a licensing arrangement with Global Academies.</p> <p>The Applicant objects to the CSO examining outcomes from GLACS and GLASW in the review of the Application for the proposed Charter School, but it also asks the evaluators to consider the experience of the founding coalition in leading these same schools.</p> <p style="padding-left: 40px;">Dr. Naomi Johnson Booker leads the founding coalition; she has demonstrated the ability to develop and lead successful schools under challenging circumstances. Dr. Booker, a former regional superintendent at the School District of Philadelphia, led a group to restructure a failing charter school, and built what is now GLACS into a thriving school. In 2016, GLACS was granted the Samuel B. Huey School, which it restructured into a successful learning institution. (p. 45, Revised Narrative)</p>

	<p>It is important to note that Dr. Booker established Global Academies for the following purpose:</p> <p>To ensure the equity of resources and learning opportunities at both [GLACS] and [GLASW], Dr. Booker established Global Academies, a nonprofit education services organization that provides academic and business services. In 2020, Global Academies made its services available to other public charter schools, school districts, private schools, nonprofit organizations, and for-profit businesses. (Global Academies Website)</p> <p>In the following sections of the Narrative, the Applicant references the connections between the proposed Charter School and Global Academies, GLACS and GLASW: Executive Summary; Academic Program; Organizational Capacity and Compliance; Community Engagement, Support, and Impact; and Finance.</p> <p>The Applicant “intends to engage Global Academies in a vendor services and licensing agreement for the use of the Global Leadership Academy model at GLAICHS” (p. 51, Revised Narrative). The Applicant will receive services from Global Academies in “developing independent systems” for:</p> <ul style="list-style-type: none"> • Staff leadership training • Assisting with credentialing of staff, subject to GLAICHS’ [sic] oversight • Proposing policies for GLAICHS’ Board of Trustees to consider and approve • Supporting any GLAICHS’ initiative to renew its charter agreement • Providing tools to the GLAICHS’ School Leader to evaluate school leadership • Assisting GLAICHS’ with its Human resources management • Advising GLAICHS’ review of compliance issues with the Department of Education and School District of Philadelphia • Review of GLAICHS’ preparation of annual reports • Development of marketing materials/brochures • Public relations and marketing • Grant writing • Providing resources to GLAICHS in order to ensure data compliance • Assisting GLAICHS to warehouse and analyze data • Professional development (p. 52, Revised Narrative) <p>The Applicant’s target community prioritizes the graduates of GLACS and GLASW. “GLAICHS will give preference to scholars attending Global Leadership Academy Charter School and Global Academy Charter School, Southwest at Huey” (p. 64, Revised Narrative).</p> <p>The Applicant states under the Fiscal Management section on Key Responsibilities that it “will receive start-up support from the Global Academies team as part of its curriculum license agreement until key positions are filled” (p. 79, Revised Narrative).</p> <p>GLACS and GLASW have a similar mission and utilize the same educational model (“Global Leadership Academy Model”) as the proposed GLAICHS.</p> <p>Both GLACS and GLASW have historically had mixed outcomes in relation to the Charter School Performance Framework’s Academic Success domain. In the most recent ACE, students in GLACS and GLASW performed below the Similar Schools Group averages for PSSA ELA and PSSA Math. The 2021-22 ACE for GLACS may be found here: https://drive.google.com/file/d/1xryoGtRVWJD-qrq8uKb5-ZBRuCB8v2_P/view The 2021-22</p>
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	<p>ACE for GLASW may be found here: https://drive.google.com/file/d/1TVILgsGOWkNZN-cB2X9zghswkhsMSasC/view</p> <p>ELA and Math proficiency scores for the GLACS and GLASW are found below. Note that due to the COVID-19 pandemic, scores for SY 2019-2020 and SY 2020-2021 were not representative and are therefore not included.</p> <p>GLACS</p> <ul style="list-style-type: none"> • SY 2017-2018: ELA 40%, Math 12% • SY 2018-2019: ELA 33%, Math 11% • SY 2021-2022: ELA 17%, Math 1% <p>GLASW</p> <ul style="list-style-type: none"> • SY 2017-2018: ELA 17%, Math 2% • SY 2018-2019: ELA 17%, Math 4% • SY 2021-2022: ELA 10%, Math 1% <p>“Does Not Meet” ratings in Organizational Compliance and Viability for GLACS and GLASW in the 2021-2022 ACE are listed here:</p> <ul style="list-style-type: none"> • GLACS: Child Find Notice, ESL Policy, Enrollment Policy, Enrollment Materials, Water Quality, Board Oversight, Board Accessibility, Board Contact Information • GLASW: Child Find Notice, ESL Policy, Enrollment Policy, Enrollment Materials, Water Quality, Board Oversight, Board Accessibility, Board Contact Information <p>“Does Not Meet” ratings in Financial Health and Sustainability for GLACS and GLASW in the 2021-2022 ACE are listed here:</p> <ul style="list-style-type: none"> • GLACS: Debt Ratio • GLASW: Audit Findings
CLOSED, NON-RENEWED, REVOKED, AND SURRENDERED SCHOOLS; TERMINATED CONTRACTS; EXPIRED CHARTERS	<p>No substantive changes were identified in this area of the Revised Application. The Original Evaluation states:</p> <p><i>GLACS and GLASW were granted charters in 2000 and 2016, respectively. GLACS was renewed by the SRC in 2004, 2009, and 2014, and by the Board of Education in 2019. GLASW was renewed with conditions by the Board of Education in 2021.</i></p>
SERVING AS A MODEL FOR REPLICATION	<p>No substantive changes were identified in this area of the Revised Application. The Original Evaluation states:</p> <p><i>The Applicant did not provide details on how the proposed Charter School or affiliated charter schools serve as a model for replication. However, elsewhere in the Application, the Applicant discusses the desire of students at GLACS and GLASW to continue the model in high school: “GLAICHHS has evolved the Global Leadership Academy model already employed at GLACS and GLASW so that high school scholars may continue to benefit from its most successful components” (p. 4, Revised Narrative).</i></p>

Current Capacity for Replication	
<p>OPENED AND APPROVED SCHOOLS <i>(Narrative and Attachment 43)</i></p>	<p>No substantive changes were identified in this area of the Revised Application. The Original Evaluation states:</p> <p><i>The Applicant did not provide details on opened and approved schools in the Revised Narrative or Revised Attachment 43, or discuss the impact of the proposed Charter School on GLACS or GLASW's capacity to operate with successful outcomes.</i></p>