

Staff Report, Findings of Fact & Recommendation Concerning Palm Lane Global Academy Charter Petition Renewal

ANAHEIM ELEMENTARY SCHOOL DISTRICT STAFF REPORT, PROPOSED FINDINGS OF FACT & RECOMMENDATION CONCERNING PALM LANE GLOBAL ACADEMY

Date Posted: November 25, 2025

The following provides a summary of the Anaheim Elementary School District's ("District") staff report, proposed findings of fact, and recommendation concerning the Palm Lane Global Academy ("Palm Lane") renewal Charter Petition.

INTRODUCTION AND PROCEDURAL BACKGROUND

Palm Lane Global Academy ("Palm Lane," "Petitioner" or "Charter School") Palm Lane was initially approved in -2018 for a five year term. Palm Lane's current term expires June 30, 2026, as its current term was extended by two years in 2021 and an additional year in 2023 by operation of law. Palm Lane is in the "middle" performing category and has requested renewal for a term of five years from July 2026 through June 2031. Palm Lane is located within the District boundaries and currently serves students in grades TK-6.

Education Code (EC) Sections 47607 and 47607.2 determine the length of charter renewal based on high, middle, or low performing categories for charter schools established by AB 1505. The California Department of Education (CDE) has designated, pursuant to criteria in EC Section 47607(c), that Palm Lane is in the middle performance category for purposes of this renewal. As a middle performing charter school, the District Board may renew the Charter for a term of five years. If the District Board renews the Charter, the new Charter term begins on July 1, 2026. Renewals and material revisions of district appeal charters are governed by the standards and criteria set forth in EC Sections 47605, 47607 and 47607.2.

On or about September 15, 2025, Palm Lane submitted the renewal Petition to the District, along with a signed certification from Collin Felch, Lead Petitioner ("Lead Petitioner"), deeming the Petition to be complete.

Lead Petitioner seeks the renewal of the Petition by the District's Board of Trustees ("Board") for a five-year charter term that would begin on July 1, 2026 and end on June 30, 2031. The school will continue to offer a seat-based program for students in TK-6 grades.

On November 12, 2025, the District's Board held a public hearing to determine the level of support for the Petition by teachers, other District employees, and parents/guardians. On December 10, 2025, the District's Board will hold a public hearing during which it will consider the admissions preferences in the Petition and will take action to either approve or deny the renewal of the Petition.

CRITERIA FOR RENEWAL OF A CHARTER PETITION

Effective July 1, 2020, the legal standards for determining whether a charter petition should be renewed were updated. *EC* Section 47607(b) specifies that charter renewals and material revisions “are governed by the standards and criteria described in Section 47605, and shall include, but not be limited to, a reasonably comprehensive description of any new requirement of charter schools enacted into law after the charter was originally granted or last renewed.”

Pursuant to *EC* Section 47605, a renewal charter petition and/or a request for material revisions may be denied on the basis of written factual findings that support one or more of the following:

1. The charter school presents an unsound educational program for the pupils to be enrolled in the charter school.
2. The petitioners are demonstrably unlikely to successfully implement the program set forth in the petition.
3. The petition does not contain an affirmation of each of the conditions required by statute.
4. The petition does not contain a reasonably comprehensive description of all the required elements.
5. The petition does not contain a declaration of whether the charter school shall be deemed the exclusive public employer of the employees of the charter school for purposes of the Educational Employment Relations Act (EERA).

There are additional bases on which a material revision may be denied, which are not pertinent to the current Charter.

As an “additional criterion” for determining whether a charter should be renewed, the chartering authority is required to consider the charter school’s performance on the state and local indicators included in the California School Dashboard. For this purpose, charter schools are now divided into high, middle, and low performance categories, plus Dashboard Alternative Status Schools (“DASS”), based on their performance during the two consecutive years immediately preceding the renewal decision. The pertinent renewal standards and the available length of the renewal term are dependent on this categorization. (*EC* Section 47607 and 47607.2.)

The CDE annually creates a list of all charter schools and ranks their academic performance indicators from the California School Dashboard, specifying whether each school is in the high, middle, or low performing category, or is a DASS program school. This list was intended to relieve the burden on chartering authorities and provide a starting place for the renewal process. The CDE has designated Palm Lane as a “middle” performing charter school for purposes of this renewal request.

As defined in *EC* Section 47607.2, “middle” performing charter schools are any charter school not deemed as “high” or “low” performing and are eligible to be considered for a five-year renewal term.

In determining whether to renew a middle performing charter, the chartering authority is to consider the following:

- i. *The schoolwide and subgroup performance on the state and local indicators on the Dashboard, giving greater weight to measurements of academic performance.*
- ii. *Clear and convincing evidence based on verified data showing either:*
 - a) *The school achieved measurable increases in academic achievement, defined by at least one year of growth for each year of school, OR*
 - b) *Strong post-secondary outcomes, as defined by college enrollment, persistence, and completion rates equal to similar peers.*

The chartering authority may deny a “middle” performing school on these bases only by making written factual findings, setting forth specific facts to support the findings, that the school:

- i. *Failed to meet or make sufficient progress toward meeting standards that provide a benefit to the pupils of the school;*
- ii. *Closure of the school is in the best interest of pupils; AND*
- iii. *If applicable, that the decision provided greater weight to performance on measurements of academic performance.*

Also, a chartering authority may deny renewal of a charter school in any of the performance categories if it finds the school is demonstrably unlikely to successfully implement the program due to any of the following:

- a. *Substantial fiscal factors,*
- b. *Substantial governance factors, or*
- c. *The charter school is not serving all pupils who wish to attend.*

In such cases, the chartering authority must provide the charter school at least 30 days’ notice of the alleged violation(s) and provide the charter school with a reasonable opportunity to cure the violation(s), including a corrective action plan proposed by the charter school. Pursuant to *EC* Section 47607(e), the District may then deny renewal on these bases only if it makes either of the following findings:

- a. *The corrective action proposed by the charter school has been unsuccessful*
- b. *The violations are sufficiently severe and pervasive as to render a corrective action plan unviable*

DETERMINATION CRITERIA FOR RENEWAL OF PALM LANE

As stated above, CDE has designated Palm Lane as a school in the middle performance category for purposes of this renewal. In its Renewal Petition, Palm Lane states it meets the minimum required academic performance standards, and its academic performance supports Charter renewal.

To assess its academic performance against the criteria for middle-performing charter schools, Palm Lane submitted its data from the California Assessment of Student Performance and Progress (“CAASPP”) as well as comparison data for the local district and local district schools Palm Lane students would otherwise have attended. Palm Lane states the data submitted in the Renewal Petition establishes Palm Lane as a school in the middle performing category, meeting the criteria for charter renewal. Staff has not reproduced all the information provided by Palm Lane in this Staff Analysis and Proposed Findings of Fact but incorporates it herein by this reference.

A. CALIFORNIA SCHOOL DASHBOARD DATA

In 2017, the State of California instituted the California School Dashboard (<https://www.caschooldashboard.org>) to help parents and educators identify strengths and areas for improvement. The Dashboard reports how districts, schools (including charter and DASS schools), and student groups are performing across state and local measures. For state measures, performance is based on two factors: (1) current year results, or Status; and (2) whether results improved or declined from the prior year, or Change. Performance on state measures, using comparable statewide data, is represented by one of five colors with Red being lowest and Blue being highest (see Object 1 below). A performance level, or color is not provided on the Dashboard when a student group has fewer than 30 students. However, the Status and Change data will be displayed. Further, when a student group has fewer than 11 students, the group does not receive a performance level (color), and the group’s Status and Change are not displayed to protect the anonymity of the students. This information is represented by using a grey color gauge with the words “No Performance Color.”

1. Dashboard Performance

Palm Lane was established in 2018; however VCPS began operating PL in Spring of 2022. The following tables display the PL’s schoolwide Dashboard state indicators and, for comparison purposes, Anaheim Elementary School District (“AESD” or the “District”), Orange County Department of Education (“OCDE”) operated schools, and the State, for the most recent two Dashboards (2023 & 2024), measuring pre and post-pandemic academic outcomes.

PLGA’s Commitment to Students with Disabilities: While Students with Disabilities (SWD) typically face academic challenges, our nurturing, inclusive and engaging educational and instructional program is designed to support all students. Although the Students with

Disabilities student group is not a numerically significant student group for PLGA’s Academic Indicators (ELA, Math, ELPI) for the past four dashboards, but PLGA chose to include this student group’s data to demonstrate two key points: (1) commitment to providing an outstanding educational program for all students, and (2) the high quality of our program, as evidenced by our SWD students’ strong academic performance compared to district, County, and State performance.

English Language Arts Academic Indicator Performance Analysis

This analysis examines Palm Lane Global Academy's performance on the ELA Academic Indicator as reported on the 2023 and 2024 California School Dashboard. The analysis compares PLGA's performance with the District, OCDE, and California State averages using Distance from

Standard (DFS) scale scores for all students and numerically significant student groups.

Palm Lane Global Academy demonstrates substantial outperformance over county-level and significant improvement trajectory as evidenced in the English Language Arts Academic Indicator on the Dashboard using DFS.

2. Academic Performance Trajectory

PLGA's ELA performance demonstrates **strong improvement capacity** with notable strengths with its student groups and substantial county outperformance:

- **Baseline Performance (2023):** Demonstrated capacity for targeted improvement across multiple student groups
- **Acceleration Period (2024):** Achieved **remarkable improvement** with multiple student groups demonstrating significant gains and **sustained dramatic county outperformance**

ELA Academic Indicator (Source: CA School Dashboard)								
Student Group	2023 Dashboard				2024 Dashboard			
	PLGA	AESD	OCDE	CA State	PLGA	AESD	OCDE	CA State
All Students	-54.4 Orange	-56 Orange	-191.7 Red	-13.6 Orange	-42.9 Yellow	-56.7 Orange	-188.2 Orange	-13.2 Orange
EL	-59.8 Orange	-73.8 Red	-214.4 Orange	-67.7 Orange	-62.9 Orange	-74.1 Red	-231.5 Red	-67.6 Orange
SED	-55.4 Orange	-62 Orange	-206.8 Red	-42.6 Orange	-41.6 Yellow	-62.9 Orange	-210.7 Red	-40.9 Orange
**SWD	-108.1 Very Low	-115.7 Red	Not Reported	-96.3 Red	-75.5 Very Low	-114.4 Red	-200.9 Very Low	-95.6 Red
Hispanic	-51.8 Yellow	-63 Orange	-198.7 Orange	-40.2 Orange	-41.3 Yellow	-63.8 Orange	-204.3 Red	-39.3 Orange

3. Schoolwide ELA Performance Analysis

PLGA consistently demonstrates substantial outperformance of OCDE; and outperformance of AESD in the two most recent Dashboards (2023 and 2024), while working to close gaps with state averages:

4. Performance Timeline

- **2023:** Orange performance level (-54.4 DFS), **outperforming** AESD Orange (-56.0 DFS) by 1.6 points, **substantially outperforming** OCDE Red (-191.7 DFS) by 137.3 points, and **underperforming** CA State Orange (-13.6 DFS) by 40.8 points - demonstrating district-level competitiveness

- **2024:** Yellow performance level (-42.9 DFS), **dramatically outperforming** AESD Orange (-56.7 DFS) by 13.8 points, **substantially outperforming** OCDE Orange (-188.2 DFS) by 145.3 points, and **underperforming** CA State Orange (-13.2 DFS) by 29.7 points

This positive trajectory demonstrates sustained substantial advantages over county-level education, emerging district outperformance, and significant improvement capacity with an **11.5-point improvement from 2023 to 2024 Dashboard.**

5. Student Group Performance Analysis

a. English Learners (EL)

PLGA EL Performance demonstrates exceptional recent improvement with sustained County outperformance and emerging District competitiveness:

- **2023:** Orange level (-59.8 DFS), **dramatically outperforming** AESD Red (-73.8 DFS) by 14.0 points, **substantially outperforming** OCDE Orange (-214.4 DFS) by 154.6 points, and **outperforming** CA State Orange (-67.7 DFS) by 7.9 points - achieving competitive excellence
- **2024:** Orange level (-62.9 DFS), **dramatically outperforming** AESD Red (-74.1 DFS) by 11.2 points, **substantially outperforming** OCDE Red (-231.5 DFS) by 168.6 points, and **outperforming** CA State Orange (-67.6 DFS) by 4.7 points

EL Program Excellence: Consistently outperformed the District, County, and state ELA performance as reported on the CA School Dashboards.

b. Socioeconomically Disadvantaged Students (SED)

PLGA SED Performance shows exceptional recent improvement with substantial competitive advantages:

- **2023:** Orange level (-55.4 DFS), **outperforming** AESD Orange (-62.0 DFS) by 6.6 points, **substantially outperforming** OCDE Red (-206.8 DFS) by 151.4 points, and **underperforming** CA State Orange (-42.6 DFS) by 12.8 points
- **2024:** Yellow level (-41.6 DFS), **dramatically outperforming** AESD Orange (-62.9 DFS) by 21.3 points, **substantially outperforming** OCDE Red (-210.7 DFS) by 169.1 points, and **similar performance to** CA State Orange (-40.9 DFS) with 0.7 points difference

SED Academic Excellence: 13.8-point improvement from the 2023 to 2024 Dashboards, with achievement of near state-level performance demonstrates growth for economically disadvantaged students.

c. Students with Disabilities

PLGA SWD Performance represents dramatic improvement and comprehensive competitive excellence:

- **2023:** Very Low level (-108.1 DFS), **outperforming** AESD Red (-115.7 DFS) by 7.6 points, with OCDE not reporting, and **underperforming** CA State Red (-96.3 DFS) by 11.8 points, showing substantial improvement trajectory
- **2024:** Very Low level (-75.5 DFS), **dramatically outperforming** AESD Red (-114.4 DFS) by 38.9 points, **substantially outperforming** OCDE Very Low (-200.9 DFS) by 125.4 points, and **outperforming** CA State Red (-95.6 DFS) by 20.1 points

SWD Program Transformation: 32.6-point improvement from the 2022 to 2024 Dashboards demonstrates exceptional specialized program effectiveness and providing outstanding evidence of measurable academic increases far exceeding CA State performance.

d. Hispanic Students

PLGA Hispanic Performance demonstrates positive trajectory in the 2023 and 2024 Dashboards outperforming the District and County.

- **2023:** Yellow level (-51.8 DFS), **dramatically outperforming** AESD Orange (-63.0 DFS) by 11.2 points, **substantially outperforming** OCDE Orange (-198.7 DFS) by 146.9 points, and **underperforming** CA State Orange (-40.2 DFS) by 11.6 points
- **2024:** Yellow level (-41.3 DFS), **dramatically outperforming** AESD Orange (-63.8 DFS) by 22.5 points, **substantially outperforming** OCDE Red (-204.3 DFS) by 163.0 points, and **underperforming** CA State Orange (-39.3 DFS) by 2.0 points

Hispanic Student Excellence: 10.5-point improvement from the 2023 to 2024 Dashboards with near state-level performance demonstrates exceptional culturally responsive programming and inclusive educational practices.

**6. Clear and Convincing Evidence of Measurable Academic Increases
Outstanding Competitive Positioning Summary:**

- **Exceptional Students with Disabilities Excellence:** 32.6-point improvement with comprehensive outperformance of all comparison entities demonstrates superior specialized programming
- **Emerging District Leadership:** PLGA outperforms AESD across multiple student groups in 2024, indicating superior educational programming
- **Dramatic County Superiority:** 125+ point advantages over OCDE across most student groups providing families with substantially superior educational alternatives
- **Recovery and Acceleration Capacity:** 2024 data demonstrate exceptional ability to achieve significant performance gains across multiple student populations

- **Equity Achievement:** Strong performance across all historically underserved populations demonstrates effective inclusive educational practices

Evidence-based Practices to improve ELA Academic Performance 2025-26 Action Plan

Based on Palm Lane Global Academy's need to strengthen ELA achievement across all student populations, particularly given the diverse demographics including 36% English Learners, 77% socioeconomically disadvantaged students, and 16% Students with Disabilities, this comprehensive action plan establishes systematic approaches to ELA instruction, intervention, and professional development. Based on a comprehensive needs assessment, PLGA has developed the following strategic Action Plan starting with the 2025-26 school year as outlined in the school's 2025-26 LCAP.

This analysis examines Palm Lane Global Academy's performance on the Mathematics Academic Indicator as reported on the 2023 and 2024 California School Dashboard. The analysis compares PLGA's performance with AESD, OCDE, and California State averages using Distance from

Standard scale scores for all students and numerically significant student groups.

1. Academic Performance Trajectory: 2019-2024

PLGA demonstrates mixed Mathematics performance with strong improvement capacity relative to AESD, dramatic county outperformance of OCDE across all student groups,

and demonstrated effectiveness with its Students with Disabilities program demonstrating remarkable improvement and comprehensive competitive excellence.

- **Baseline Performance (2023):** Showed mixed results with some groups beginning improvement trajectory
- **Acceleration Period (2024):** Achieved significant improvement across multiple student groups with strengthened competitive positioning

Math Academic Indicator (Source: CA School Dashboard)								
Student Group	2023 Dashboard				2024 Dashboard			
	PLGA	AESD	OCDE	CA State	PLGA	AESD	OCDE	CA State
All Students	-80.8 Orange	-70.5 Yellow	-245.1 Red	-49.1 Orange	-65.4 Yellow	-69.2 Orange	-246.7 Red	-47.6 Orange
EL	-90.4 Orange	-85.5 Orange	-272.5 Orange	-93.4 Orange	-77.6 Yellow	-84 Orange	-275.8 Red	-93.4 Orange
SED	-79.3 Orange	-76.7 Yellow	-263.3 Red	-80.8 Yellow	-66.5 Yellow	-75.7 Orange	-266.3 Red	-78.2 Orange
*SWD	-97.9 Very Low	-128.2 Red	Not Reported	-127.3 Orange	-83.4 Low	-127.5 Red	-250 Very Low	-124.3 Red
Hispanic	-79.9 Orange	-78 Yellow	-254.3 Red	-80.8 Orange	-63.9 Yellow	-76.6 Orange	-265 Red	-79.2 Orange

2. Schoolwide Mathematics Performance Analysis

PLGA demonstrates sustained competitive excellence with AESD while maintaining dramatic outperformance of OCDE and working to close gaps with state averages:

3. Performance Timeline

- **2023:** Orange performance level (-80.8 DFS), **underperforming** AESD Yellow (-70.5 DFS) by 10.3 points, **dramatically outperforming** OCDE Red (-245.1 DFS) by 164.3 points, and **underperforming** CA State Orange (-49.1 DFS) by 31.7 points - showing temporary performance gap
- **2024:** Yellow performance level (-65.4 DFS), **outperforming** AESD Orange (-69.2 DFS) by 3.8 points, **dramatically outperforming** OCDE Red (-246.7 DFS) by 181.3 points, and **underperforming** CA State Orange (-47.6 DFS) by 17.8 points

This positive trajectory demonstrates sustained substantial advantages over county-level performance, renewed district competitiveness, and significant improvement capacity with a **15.4-point improvement from 2023 to 2024 Dashboards.**

B. LOCAL INDICATORS

Palm Lane Global Academy received a “standard met” for all local indicators as reported on the 2023 and 2024 CA School Dashboard.

EXECUTIVE SUMMARY

During the review process the District staff noted some issues and concerns and determined that certain changes and revisions to the Charter were necessary in order to support renewal of the Charter. The District staff is working with Palm Lane and its legal counsel to revise the Charter prior to December 10, 2025, District Board meeting.

The District’s administrative team has taken on the review process with a high degree of diligence, accuracy, and professionalism and is prepared to make a staff report to the District Board. The renewal Charter has been assessed against the standards and requirements as set forth in the California Education Code, including those standards and considerations specified herein, to develop final recommendations. Working as a collaborative professional team, District administration submits that the recommendation to the District Board is well-documented and based upon solid criteria. The District administration has determined that renewal of the Palm Lane Charter is consistent with sound educational practice and recommends that it be approved.

District staff, in consultation with legal counsel, has conducted an extensive analysis of the Petition and its accompanying exhibits. The District’s review team carefully evaluated the legal grounds articulated in the Education Code for purposes of determining whether the Petition meets the minimum standards for renewal. The District also held discussions with the Lead

Petitioner and other representatives to learn more about the program and to ask a series of questions concerning the structure and operations of the Charter School.

Based on the District's comprehensive review of the Petition and supporting documents, as well as the information received during the discussions, District staff recommends that the Board approve the renewal of the Petition.

LEGAL REQUIREMENTS FOR THE RENEWAL OF A CHARTER SCHOOL

The consideration of a petition to renew a charter school requires the District to determine whether the petition meets the standards and criteria set forth in Education Code section 47605. Specifically, under Education Code section 47605(c), in reviewing petitions for the renewal of charter schools, the governing board of a school district shall renew a charter for the operation of a charter school if it is satisfied that approving the charter is consistent with sound educational practice and with the interests of the community in which the school is proposing to locate. The governing board shall also consider the academic needs of the students that the charter school proposes to serve. The governing board of the school district shall not deny a renewal petition unless it makes written factual findings specific to the particular petition, setting forth specific facts to support one or more of the following denial findings:

1. The charter school presents an unsound educational program for the students to be enrolled in the charter school.
2. The petitioners are demonstrably unlikely to successfully implement the program set forth in the petition.
3. The petition does not contain an affirmation of each of the required conditions.
4. The petition does not contain reasonably comprehensive descriptions of all required elements.
5. The petition does not contain a declaration of whether or not the charter school shall be deemed the exclusive public school employer of the employees of the charter school for purposes of the Educational Employment Relations Act.

An analysis of this information is provided below and includes District staff's corresponding findings of fact.

FINDINGS OF FACT

The District's review team performed a comprehensive evaluation of the Petition, which included an analysis of the Charter School's educational program, measurable student outcomes, and methods for measuring student progress, fiscal and governance structures, employee qualifications, student admissions, facilities, and legal issues. Below, District staff presents its findings of fact addressing the general categories of review for the Petition, which correspond with the criteria set out in Education Code section 47605.

A. The Petition Presents a Sound Educational Program for the Students Enrolled in the Charter School

Overall, the Petition's program is consistent with sound educational practice."

Palm Lane Global Academy's mission is to create a transformative TK-6 learning experience that is engaging, culturally and socially relevant, and globally oriented, and builds a strong STEAM foundation for college and career readiness. We aim to provide a quality education for all students by focusing on both heart and mind, creating a compassionate global learning community that involves students in their development of the knowledge, skills, attitudes, behaviors, aspirations, and beliefs needed to be successful academically and globally competent with the scientific and technical skills to both compete in and humanely serve an ever-increasing interdependent international world.

Palm Lane is deeply committed to educating for global competence, closing the achievement gap for low-income and historically underserved students, and addressing the growing opportunity gap created by providing a relevant education that develops the knowledge, skills, and dispositions required for college readiness and full participation in a modern global economy. Students with global competence as well as a strong technological foundation are able to investigate the world beyond their immediate environment and conduct well-crafted and age-appropriate research, recognize divergent perspectives, including their own and those of others, communicate their ideas effectively, and, most importantly, take action to improve their own conditions and those affecting the world around them. Palm Lane strives to create a learning environment in which students have a say in what they learn and how they learn it, apply knowledge and skills to authentic and every-day tasks that have local and global significance, and have myriad opportunities to exhibit their mastery to a real-world audience. Most importantly, PLGA envisions a school where students enter to learn, but leave ready to humanely serve through a deeper understanding of their role in impacting positive change on the world around them.

The District review team finds Palm Lane provides a nurturing environment and delivers a curriculum that prepares its graduates to be competent learners.

The District staff believes that this element of the Charter is reasonably comprehensive.

B. The Petitioners Are Demonstrably Likely to Successfully Implement the Program Set Forth in the Petition

The Petitioners are demonstrably likely to successfully implement the program set forth in the Charter.

C. The Petition Contains an Affirmation of Each of the Conditions Described in Education Code Section 47605(e)

The Petition includes all required affirmations and assurances of the required conditions.

D. The Petition Contains Reasonably Comprehensive Descriptions of all the Required Elements

This section of the Staff Analysis includes highlights regarding the various required charter elements. In order for the description of each element to be considered “reasonably comprehensive,” it is not enough that the petition includes a description, but, rather, the description should set forth plans or proposals that are acceptable to the District and be consistent with and not contrary to the District’s standards and expectations for charter schools under its oversight. Based on an analysis of the Petition by the District’s review team, the Petition provided reasonably comprehensive descriptions of the required elements set forth in Education Code section 47605, subject to the Charter School complying with the conditions set forth below.

1. Element One: Description of the Educational Program/Plan for Student Academic Achievement

Palm Lane is an independent local educational agency (“LEA”) member of a special education local plan area (“SELPA”) and thus is not a school of the District for purposes of compliance with the Individuals with Disabilities Education Improvement Act (“IDEIA”). The Charter petitioners have described the means of providing services to students with disabilities as described in the Charter. Overall, it appears that Palm Lane appropriately serves students with disabilities. The Charter School is solely responsible for compliance with Section 504 of the Rehabilitation Act of 1973 and the Americans with Disabilities Act, and it would be necessary for Palm Lane to indemnify, defend, and hold the District harmless from claims related to its compliance with these laws.

The District staff believes that this element of the Charter is reasonably comprehensive.

2. Element Two: Measurable Student Outcomes

The Charter includes a description of Palm Lane’s measurable student outcomes.

The District staff believes that this element of the Charter is reasonably comprehensive.

3. Element Three: Method by Which Pupil Progress in Meeting Outcomes Will Be Measured

The Charter describes assessments and methods for measuring student progress, as well as how the assessments align to Palm Lane’s curriculum.

The District staff believes that this element of the Charter is reasonably comprehensive.

4. Element Four: Governance Structure

The Charter School is currently operated by Vista Charter Public Schools, a California nonprofit public benefit corporation governed by a Board of Trustees. The District Board authorized a material revision of the charter in 2022 to allow for a change in the governance structure of the school

The Charter does acknowledge the District's right to appoint a representative. The Charter must acknowledge that should the District appoint a representative, no limitations or requirements for service or terms apply to that representative, and Palm Lane will have no involvement in appointing or removing such a representative. The provisions of the corporate bylaws would require refinement to be consistent with this commitment. The Charter includes the names and relevant qualifications of the current members of the Board of Directors. The petitioners also provided copies of the Articles of Incorporation and the Corporate Bylaws.

A District approved charter would require compliance with additional best practices and the District's oversight standards related to charter school governance, including appropriate updates to governance documents. Renewal of the Charter would require compliance with all of the following:

- a. The Charter School would need to commit to maintaining tax exempt status throughout the term of its Charter.
- b. The Charter specifies that the Board of Directors will include with its posted agendas links to the backup materials for each agenda item for which there are electronic versions of backup materials that are not excluded from public disclosure.
- c. Prior to any proposed revisions to the corporate articles of incorporation and/or bylaws, the Charter School shall provide at least three weeks' prior notice to the Superintendent or designee of the proposed revision(s). Should the Superintendent or designee indicate that the District considers the proposed revision(s) a material revision to the Charter, the Charter School may not adopt such revision(s) unless and until it first obtains renewal of a material revision. The discussion of revisions in the bylaws must be updated to be consistent with these requirements.
- d. The Charter School must agree to require that all Board members and senior administrators undergo training on the Brown Act, the Political Reform Act, and Government Code Section 1090, at least annually and within 90 days of taking the position with the Charter School. This training shall be conducted by an individual or entity with professional knowledge and expertise in the law, regulations, and rules governing these provisions and not by the Charter School's own Board members or administrators.
- e. Palm Lane must continue to adopt the Fair Political Practices Commission's (FPPC) Model Conflict of Interest Code and the related designation of employees and the formulation of disclosure categories as the Charter School's conflict of interest code. It should be required always to maintain its conflict code in compliance with the FPPC's model.

The District staff believes that this element of the Charter is reasonably comprehensive.

5. Element Five: Employee Qualifications

The Charter specifies that all teachers are required to hold credentials required by law for their certificated assignment. Although not required by the Charter Schools Act, tPalm Lane Principal is required to hold an underlying teaching credential and an Administrative Services Credential. The Charter currently also lists the qualifications/ experience required for Superintendent but it does not include an explanation of how this position is allocated amongst the other Vista Schools. The Charter should be revised to include such information. Similarly, the Charter does not list the qualifications for a variety of other employment positions and it is recommended that the Charter be revised to specify such qualifications.

District Staff believes this element of the Charter is reasonably comprehensive if revised as recommended by District Staff.

6. Element Six: Health and Safety Procedures

The Charter states that Palm Lane has adopted and implemented a comprehensive set of health, safety, and risk management policies in consultation with its insurance carriers and risk management experts. It commits to reviewing and updating these policies as necessary on an ongoing basis, and more formally on an annual basis. The Charter also specifies that all staff will be trained annually on health, safety, and risk management policies and procedures. The Charter School also commits to adopting and annually updating by March 1 a school safety plan that includes all of the required topics. The Charter provides a summary and/or general reference to some of its planned health and safety procedures, though it does not refer to every health and safety policy or procedure with which the Charter School would be required to comply.

The District staff believes that this element includes a reasonably comprehensive description.

7. Element Seven: Racial, Ethnic, English Learner, and Special Education Balance

The Petition does adequately address the means by which the Charter School will achieve a balance of students from different subgroups that is reflective of the general population residing within the territorial jurisdiction of the District.

Education Code Section 47605(c)(5)(G) requires that the Charter include a reasonably comprehensive description of:

The means by which the charter school will achieve a balance of racial and ethnic pupils, special education pupils, and English learner pupils, including redesignated fluent English proficient pupils, as defined by the evaluation rubrics in [Education Code] Section 52064.5, that is **reflective** of the general population residing within the territorial jurisdiction of the school district to which the charter petition is submitted.

(Emphasis added.)

The Charter Schools Act thus requires Palm Lane to describe the means by which it will achieve the specified student breakdown that is “reflective” of the general population residing within the District not that is “identical” to that population. There is no case law or other interpretation defining this terminology and what is required of a charter school. In this case, Palm Lane’s enrollment projections stem from its design that endeavors to implement an innovative educational approach comporting with some of the statutory purposes for charter schools, such as encouraging the use of different and innovative teaching methods and providing expanded choices of educational opportunities.

The Petition includes references to targeting non-English speakers and “diverse” groups of learners and families. One of the overarching legislative purposes for the establishment of a charter school is to offer increased learning opportunities for students, with particular emphasis on expanded learning experiences for students who have been identified as academically low-achieving. In addition, when considering whether to approve or deny a petition, a district governing board is charged with the responsibility of considering the academic needs of the students that the charter school proposes to serve. Consequently, the District staff finds that the clear, focused assessment and understanding of the Charter School’s target population; the program would effectively address the educational and social-emotional needs of students in a manner that aligns with the District’s student demographics.

Palm Lane has outlined a recruitment strategy that it deems crucial to its recruitment of a diverse student population inclusive of students with disabilities and English learners. This plan includes the use of strategies that have been designed and used by other schools that Palm Lane has vetted and determined to be effective in recruiting diverse families within the community. The Charter also includes an anticipated recruitment calendar with recruitment events aimed at achieving diverse enrollment.

The Charter explicitly acknowledges and affirms the need to use an enrollment lottery should there be more interested students than spaces, which may affect the ultimate enrollment demographics. Palm Lane also explicitly affirms that it will comply with the requirement that its admissions preferences will not result in limiting enrollment access for “pupils with disabilities, academically low-achieving pupils, English learners, neglected or delinquent pupils, homeless pupils, or pupils who are economically disadvantaged, as determined by eligibility for any free or reduced-price meal program, foster youth, or pupils based on nationality, race, ethnicity, or sexual orientation.” Palm Lane does not propose to give enrollment preference to students from districts other than the District, which may also result in the Charter School’s demographics more closely reflecting District residents.

It will be necessary for Palm Lane to monitor closely its recruitment strategies and enrollment to ensure that its approach complies with all requirements of the Charter Schools Act, including maintaining an appropriate student balance reflecting the District’s population, serving all students who wish to attend, and not taking any actions that limit enrollment access in violation of the law.

8. Element Eight: Admission Policy and Procedures

In the event there are more applicants than spaces at a particular grade level, the Charter specifies that Palm Lane will determine admission using a public random drawing. Pursuant to law, current students of the Charter School are entitled to remain enrolled and are exempt from the drawing process. Students already enrolled in Palm Lane will be exempted from the lottery. In the event a public random drawing is required, Palm Lane specifies its intent to implement the following preferences:

1. Children or relatives of employees of Palm Lane
2. Siblings of currently enrolled or admitted Palm Lane students
3. Residents of the Anaheim Elementary School District
4. All other students residing in the State

Other than the preferences for residents of the District, whether to permit the proposed preferences is within the discretion of the District. The Charter must be revised to reflect the order of these preferences.

The Charter provides details or specificity regarding the public random drawing procedures generally and implementation of the preferences specifically. Palm Lane uses an automated, computer-based process. To ensure that students are not improperly discouraged from attending or that families are not requested to provide protected information, and to be consistent with the prohibition against requesting pupil records before enrollment, the Charter should specify that the application is limited only to the specified information if the Charter is renewed.

District Staff believes that this element of the Charter is reasonably comprehensive.

9. Element Nine: Annual Financial Audit

The Charter includes appropriate information about the manner in which annual independent financial audits will be conducted and how audit deficiencies and expectations will be resolved to the satisfaction of the District.

The District staff believes that this element includes a reasonably comprehensive description.

10. Element Ten: Student Suspension/Expulsion Procedures

The Charter sets forth suspension and expulsion policies, which have been largely modeled on the procedures applicable to noncharter California public schools. The Charter contains references to a hearing panel and contains discussion regarding an appeal which is unusual for charter schools, raising questions about the process. Palm Lane will provide clarification about the process and update the Petition as necessary prior to December 6, 2025.

The District staff believes this element of the Charter is reasonably comprehensive if revised as recommended by District Staff.

11. Element Eleven: Employee Retirement Systems

The Charter specifies that eligible certificated employees participate in the State Teachers' Retirement System (STRS). At this time, Palm Lane will not participate in the California Public Employees' Retirement System (CalPERS), and non-STRS eligible employees will participate in a 403(b) plan and social security. The School Director, with support from the office manager and back-office services provider, will be responsible for ensuring compliance.

The District staff believes this element of the Charter is reasonably comprehensive.

12. Element Twelve: Public School Attendance Alternatives

The Charter specifies, "Any student who resides in the District who chooses not to attend Palm Lane may attend school within the District in accordance with District policy and/or apply for an inter-district transfer in accordance with local school district policies."

The District staff believes this element of the Charter is reasonably comprehensive.

13. Element Thirteen: Description of the Rights of an Employee of the District , Upon Leaving the Employment of the District to Be Employed by the Charter School

The Charter specifies that employees of The District who leave their employment positions at District to work at Palm Lane have no automatic rights to return unless specifically granted by the District.

The District staff believes this element of the Charter is reasonably comprehensive.

14. Element Fourteen: Dispute Resolution

The Charter sets forth a dispute resolution procedure for disputes between Palm Lane and the District, that is not consistent with the District's best practices and oversight requirements or how the District operates. The District has proposed updates/ revisions to this policy to bring it into alignment with the District's best practices.

The District staff believes this element of the Charter includes a reasonably comprehensive description and comports with the District's best practices if Palm Lane agrees to the District's proposed updates/ revisions.

15. Element Fifteen: Closure Protocol

While the Charter describes closure procedures, additional specificity regarding closure procedures and the handling and transfer of records, is needed and will be included in the revised Charter.

The District staff believes this element of the Charter is reasonably comprehensive if the issues described above are revised as recommended by District Staff.

Additional Required Information

The petitioner(s) are required to provide information regarding the proposed operation and potential effects of the school including, but not limited to, the manner in which administrative services of Palm Lane are to be operated.

Palm Lane will provide or procure its own administrative services, including, but not limited to, financial management, accounts payable/receivable, payroll, human resources, and instructional program development, through its own staff or appropriate qualified third-party providers. Palm Lane plans to continue using a charter school “back office services” provider to provide these services.

16. Potential Civil Liability Effects, if any, Upon Palm Lane and Upon the District

The Charter does not include appropriate language whereby it will indemnify the District “for the actions of Palm Lane under this charter.” The District has submitted proposed insurance and indemnification language pursuant to which Palm Lane will obtain insurance as recommended by the District’s and the Charter School’s insurance company for schools of similar size, location, and student population and “shall comply with all District requirements for insurance” and name the District as additional insureds on its general liability insurance. As a condition of any renewal of the Charter, it would be essential that Palm Lane be required to carry out those intentions and commitments to abide by the District’s required insurance and indemnification, defense, and hold harmless requirements. Palm Lane will be required to update and revise the charter to include the proposed language prior to the December 7, 2025.

17. Facilities Description/Compliance with Location Requirements

The Charter Petition provides that Palm Lane will continue to operate at 1646 W. Palm Lane, Anaheim, California in a District facility pursuant to the provisions of Education Code Section 47614 (Commonly referred to as Prop 39).

CONCLUSION/RECOMMENDATION

The District Staff reviewed the Charter for Palm Lane utilizing the criteria for consideration and action on the Charter, as set forth in Education Code Section 47605 and 47607. It is the District staff’s recommendation that the Palm Lane Charter be renewed subject to revisions to the Charters to address all the District’s concerns, including those specified herein. The District’s review team has concluded that the Petition does meet the minimum legal standards under the Education Code to qualify for renewal for the requested five-year term, beginning on July 1, 2026 through June 30, 2031, if Palm Lane meets all conditions specified herein. For these reasons, District Staff recommends that the Board of Trustees take action to approve the Petition and that the District Board of Education adopt a Board Resolution approving the Charter for the Palm Lane Charter School.

PROPOSED MOTION

Motion to approve the renewal of the Palm Lane Charter School Charter and adopt Resolution Approving the renewal of the Palm Lane Charter School Charter.