

## AGENDA ITEM EXECUTIVE SUMMARY: Compliance Matters—Lifelong Learning Research Institute, Inc. (Entity ID: 79926)

### Issue

Pursuant to Arizona Revised Statute (“A.R.S.”) § 15-183(R) and Arizona Administrative Code (“A.A.C.”) R7-5-403(F), if the Board determines a charter holder does not meet the Board’s minimum operational performance expectations, it shall consider the charter holder’s noncompliance and additional charter oversight as outlined in Article 6 of the A.A.C, including issuing a notice of intent to revoke the charter contract. Pursuant to this rule, Lifelong Learning Research Institute, Inc. (“Charter Holder”) has been placed on the agenda for the Board’s consideration.

The Charter Holder failed to meet the minimum operational performance expectations set forth in A.A.C. R7-5-403 and the Board’s Operational Performance Framework when the Charter Holder received an overall rating for fiscal year 2019 of “Does Not Meet the Board’s Operational Performance Standard” due to seven of the nine Operational Performance Framework measures being rated “Does Not Meet Standard”.

### Policy Background—Operational Performance Framework

The Board shall annually assign a charter holder an overall operational performance rating based on measures specified in the Operational Performance Framework, which reflect the degree to which the charter holder achieved the minimum operational performance expectations. A.A.C. R7-5-403(B). The Board shall determine a charter holder meets the minimum operational performance standard if the charter holder receives no measures rated “Falls Far Below Standard” and no more than five measures rated “Does Not Meet Standard” for the evaluated year. A.A.C. R7-5-403(C).

### Charter Holder Background

The Charter Holder was granted a 20-year renewal charter in 2016. The Charter Holder operates one school, Lifelong Learning Academy (the “School”), serving grades K-8 in Tucson. The School received alternative designation in fiscal years 2017 and 2018 but was not renewed alternative status by the Arizona Department of Education (“ADE”) in fiscal year (“FY”) 2019.

For FY 2020, the Charter Holder is reporting an estimated count of 20 students as of August 1, 2019. For additional information on the Charter Holder, see *Appendix A: Charter Holder Profile*.

Board staff conducted an unscheduled site visit to the School on March 12, 2019. At the visit, Board staff identified multiple compliance issues leading to marking the Charter Holder’s operational dashboard and requiring submissions to bring the Charter Holder into compliance. Several of the issues were related to the implementation of the School’s current program of instruction, policies related to enrollment, appropriate fingerprinting requirements for its staff, required teacher salary posting, insufficient governing board minutes and the charter’s noncompliance with responding timely to these issues. See *Appendix B: Onsite Visit Final Report* for more detail.

Outside of the issues identified during the school site visit, the Charter Holder was also out of compliance in its requirements to ADE concerning services to students with disabilities and had a complaint substantiated due to violations with Open Meeting Law.

During the school site visit, Board staff met with corporate and school governing board members Robert Klem and Shirley Williamson. Ms. Williamson also serves as the school’s front office manager. School principal, charter representative and corporate and school governing board member, Mary Lou Klem, was not in attendance. All three board members also serve on the corporate and school governing bodies of Jack Thoman Air and Space Academy and Performing Arts Studio, a sister school under a separate charter being considered by the Board at the September 9, 2019 meeting.

See *Appendix C: Communication Timeline* for detailed information about Board contact with the Charter Holder.



Summary of the Operational Performance Measures Recorded in FY 2019

Measure	Identified at	Original Notification Date	Original Due Date	Status
<b>1.a. Educational Program – Essential Terms*</b>	Unscheduled Site Visit (“USV”)	4-19-19	5-20-19	<ul style="list-style-type: none"> <li>Outstanding issue related to the program of instruction, last notification sent on July 18, 2019</li> <li>Mission related-issue submitted by due date</li> </ul>
<b>1.b. Services to Student with Disabilities</b>	ADE	2-8-19	4-8-19	Outstanding issue related to ADE Monitoring CAP
<b>2.b. Enrollment Practices</b>	USV	4-19-19	5-20-19	Submitted by due date
<b>2.c. Fingerprinting</b>	USV	4-19-19	5-20-19	Outstanding issue, last notification sent on July 18, 2019
<b>2.d. Academic Performance Notifications</b>	USV	4-19-19	5-20-19	Submitted by due date
<b>2.d. Open Meeting Law</b>	USV	4-19-19	5-20-19	Submitted by due date
	Complaint	8-15-18	8-29-18	Complaint substantiated on December 17, 2018
<b>2.e. Timely Submissions</b>	USV	4-19-19	5-20-19	Outstanding issue related to the school name change, last notification sent on July 18, 2019
	Complaint	8-14-18		Complaint substantiated on December 17, 2018
<b>3. Other Obligations</b>	USV	4-19-19	5-20-19	Teacher Salary Posting submitted on June 10, 2019

\*The operational measures in red indicate the Charter Holder has not met the compliance requirements to close out the issue.

1.a. Educational Program—Mission Statement

A.A.C. R7-5-303 requires that all charters submit amendment requests to the Board through ASBCS Online when making changes to the charter contract. During a review conducted before the school site visit, Board staff found that the Charter Holder’s mission on ASBCS Online was not in alignment with the operating mission on the Charter Holder’s website. Because the mission statement of the Charter Holder differs from the mission listed in the charter contract, the Charter Holder is required to update its mission through the Board’s amendment process.

The Charter Holder’s failure to ensure the School’s mission aligns with the charter contract resulted in a rating of “Does Not Meet Standard” for the operational performance framework measure that determines whether a charter holder’s educational program and operations reflects the essential terms of the educational program as described in the charter contract.

Subsequently, the Charter Holder timely updated the Charter Holder’s website to reflect the mission on file with ASBCS Online.



### 1.a. Educational Program—Program of Instruction

A.A.C. R7-5-303 requires that all charters submit amendment requests to the Board through ASBCS Online when making changes to the charter contract. During a review conducted before the school site visit, Board staff found that the Charter Holder’s program of instruction in the charter contract was not in alignment with the educational program described on the Charter Holder’s website. Because the program of instruction of the Charter Holder differs from the one listed in the charter contract, the Charter Holder is required to update the program of instruction through the Board’s amendment process.

Furthermore, during the school site visit, and during the process of reviewing materials submitted after the school site visit, Board staff did not see evidence that the School has a specified educational program to instruct students with autism or to provide a science, technology, engineering, and math (S.T.E.M.) curriculum. *See Appendix D: Program of Instruction for more detail.*

The Charter Holder’s failure to ensure the charter’s program of instruction is delivered in accordance with the charter contract resulted in a rating of “Does Not Meet Standard” for the Operational Performance Framework measure that determines whether a charter holder’s educational program and operations reflect the essential terms of the educational program as described in the charter contract.

Subsequently, after a second notification was sent by Board staff, the Charter Holder did not submit evidence of the School’s program of instruction to support the educational models being implemented at the School. Instead, the Charter Holder submitted an explanation that minimally addresses the School’s curriculum and programs. *See Appendix E: 30 Day Failure to Submit- Program of Instruction for more detail.*

On June 18, 2019, a last notification was sent to the Charter Holder requesting the submission of a program of instruction amendment and evidentiary documentation to support the School’s current educational models described above. *See Appendix F: 7 Day Failure to Submit- Program of Instruction for more detail.* No evidence has been submitted to the Board.

### 1.b. Services to Students with Disabilities

A.R.S. § 15-183 (E)(7) requires that charter holders comply with “all federal and state laws relating to the education of children with disabilities in the same manner as a school district.”

On February 8, 2019, ADE’s Exceptional Student Services (“ESS”) division notified Mrs. Mary Lou Klem, the authorized charter representative, that the School was out of compliance with the Individuals with Disabilities Education Act (“IDEA”) following an on-site monitoring of the School’s special education program. ESS identified areas of noncompliance in each of the four categories reviewed: Child Find, Evaluation/Reevaluation, Individualized Education Program, and Procedural Safeguards/Parental Participation. The School was issued a Corrective Action Plan (“CAP”).

Due to its failure to comply with A.R.S. § 15-183(E)(7), the Charter Holder was rated “Does Not Meet Standard” for the operational performance framework measure that determines a charter holder adheres with applicable education requirements defined in state and federal law.

The Charter Holder was required to submit specified documentation to ADE to satisfy the outlined requirements in the CAP by April 8, 2019.

No additional documentation has been submitted to ESS to close out the CAP.



## 2.b. Enrollment Processes

Charter holders in Arizona are required to comply with all applicable statutes and rules regarding enrollment practices that do not violate the rights of students. A.R.S. § 15-110; A.R.S. § 15-184.

During the school site visit, and during the process of reviewing materials submitted after the school site visit, several violations regarding enrollment practices were identified.

- A.A.C. R7-2-306(B) (1) and (2) (a), (b), and (c) require that a student’s parent or legal guardian identify the primary or home language of all students on the enrollment form and the home language survey. The School’s enrollment packet was missing the three required language questions on the enrollment form.
- A.R.S. § 15-828 details the available options for families to present as proof of age and identity for the enrolling student. The School’s enrollment packet did not indicate that families have the option to provide documentation other than a birth certificate as prescribed by A.R.S. § 15-828.
- A.R.S. §§ 15-872(E) and 15-873(A) detail the available options and timelines for families to submit immunization records or a waiver. The School’s enrollment packet did not indicate that families have the option to provide documentation other than a complete immunization record for enrollment. The packet required the immunization record to be submitted at the time of enrollment.

The Charter Holder’s failure to comply with all applicable statutes and rules regarding enrollment practices resulted in a rating of “Does Not Meet Standard” for the operational performance framework measure that determines whether a charter holder appropriately administers student admission and attendance.

Subsequently, the Charter Holder timely submitted an updated enrollment packet which complied with all relevant Arizona Revised Statutes described above.

## 2.c. Fingerprinting

A.R.S. § 15-183(C)(5) requires that all persons engaged in instructional work directly as a classroom, laboratory or other teacher have a valid fingerprint clearance card (“FCC”) issued by the Arizona Department of Public Safety (“DPS”). A.R.S. § 15-512 requires non-instructional staff to be fingerprint checked through DPS.

During the school site visit, School staff was unable to provide a valid FCC for one substitute teacher and the appropriate fingerprint check for a parent volunteer that was observed monitoring the students at the computer lab without supervision and for a staff member responsible for landscaping.

The Charter Holder was rated “Does Not Meet Standard” for the Operational Performance Framework measure that determines compliance with maintaining a safe environment consistent with state and local requirements.

Subsequently, the Charter Holder provided a narrative response indicating that the person responsible for landscaping had only visited the school once and that the School understood that a parent volunteer would require a valid FCC if the volunteer left the area of direct supervision (e.g. to supervise students in the computer lab). The response also stated that the FCC for the substitute teacher is current and was included in the submission to Board staff. However, no evidence of a valid FCC was found in that submission.

On June 18, 2019, a last notification was sent to the Charter Holder requesting a copy of a valid FCC. No evidence has been submitted to the Board that the substitute teacher has been issued a valid FCC by DPS.



## 2.d. Academic Performance Notifications

Pursuant to A.R.S. § 15-114, charter schools “shall not display any achievement, classification or ranking that was assigned by a public or private entity after the achievement, classification or ranking is no longer current unless the year of issuance of the achievement, classification or ranking is prominently displayed.”

During the school site visit, Board staff reviewed the School’s current calendar and found the academic performance information was outdated. The calendar stated that the School was an “A” school and did not prominently display the year the School was rated an “A” school.

Due to its failure to comply with A.R.S. § 15-114, the Charter Holder was rated “Does Not Meet Standard” for the operational performance framework measure that determines a charter holder is transparent in its operations.

Subsequently, the Charter Holder timely removed the statement from the School’s current calendar.

## 2.d. Open Meeting Law

Charter school governing bodies are required to comply with A.R.S. §§ 38-431.01-09, Open Meeting Law.

A.R.S. § 38-431.02 requires public notice of all meetings of public bodies and outlines what the notices must include. A complaint filed against the Charter Holder on August 14, 2018 alleged that the Charter Holder had violated A.R.S. § 38-431.02. According to the 2017 audit for the Charter Holder, it indicated that these requirements had been met, therefore a complaint was filed for providing false information. After reviewing the complaint, the Charter Holder’s response, and all follow up information requested, the complaint was substantiated and closed on December 17, 2018.

A.R.S. § 38-431.01(B) requires that public meeting minutes include: date, time, and place of meeting; names of members of the public body present or absent; a general description of matters considered; an accurate description of all legal actions proposed, discussed, or taken; and the names of members who proposed each motion. The minutes shall also include the names of the persons, as given, making statements or representing material to the public body and a reference to the legal action about which they made statements or presented materials.

During the school site visit, Board staff was provided the governing board minutes for the June 20, 2018, July 2, 2018, and October 15, 2018 meetings. Each of the meeting minutes contained various violations of Open Meeting Law, to include: not listing absent or present members; not providing an accurate description of what legal action was taken; not listing the vote of the motioning board member.

Due to its failure to comply with Open Meeting Law, as described above, the Charter Holder was rated “Does Not Meet Standard” for the Operational Performance Framework measure that determines a charter holder is transparent in its operations.

Subsequently, the Charter Holder timely submitted corrected board minutes which complied with Open Meeting Law as required.

## 2.e. Timely Submissions—School Name Change

A.A.C. R7-5-303 requires that all charters submit amendment requests to the Board through ASBCS Online when making changes to the charter contract. The charter contract for this school states that the name of the school is “Lifelong Learning Academy”. However, during the site visit, Board staff observed that the School’s name on the building was “Air and Space Academy.” Additionally, at the time of the visit, this was the name listed on the School’s website, enrollment materials, and handbook. Because the operating name of the school differs from the name listed in the charter contract, the Charter Holder is required to update the name properly through the Board’s amendment process. A.A.C. R7-5-303(D)(18).



Due to its failure to comply with A.A.C. R7-5-303, the Charter Holder was rated “Does Not Meet Standard” for the Operational Performance Framework measure that determines a charter holder is complying with its obligations to the Board.

Subsequently, the Charter Holder indicated it would not be changing the name of the School through the amendment process. Instead, it would make arrangements to change the electronic signage. On June 18, 2019, the last notification was sent to the Charter Holder requesting proof of the change in electronic signage on the school building. No evidence has been submitted to the Board to show proof of the change.

## 2.e Timely Submissions—Complaint Response

Pursuant to A.A.C. R7-5-507(C), a charter holder complained against shall, within ten days after receiving a copy of the complaint, provide a written response to the Board that addresses each allegation, the statement of facts, and supporting evidence in the complaint.

On August 15, 2018, the Charter Holder was notified of a complaint related to Open Meeting Law violations (*see 2.d. Open Meeting Law*), and a response was due by August 29, 2018. The Charter Holder failed to timely submit a response by the given deadline. The Charter Holder’s failure to timely submit resulted in a rating of “Does Not Meet Standard” for the operational performance framework measure that determines whether a charter holder is complying with its obligations to the Board.

Subsequently, the Charter Holder was given a final deadline of September 6, 2018 to submit a response. The Charter Holder submitted a response before the deadline. After reviewing the response, Board staff requested follow-up information and granted the Charter Holder a deadline of October 16, 2018. The Charter Holder failed to timely submit a response by the October 16 deadline. The Charter Holder’s failure to timely submit resulted in a second mark under the Operational Performance Framework measure that determines whether a charter holder is complying with its obligations to the Board.

The Charter Holder was given a final deadline of October 22, 2018 to submit the required follow-up information. The Charter Holder failed to timely submit a response by the given deadline. The Charter Holder’s failure to timely submit resulted in a third mark under the operational performance framework measure that determines whether a charter holder is complying with its obligations to the Board.

The complaint was substantiated and closed on December 17, 2018.

## 2.e Timely Submissions—Site Visit Required Documentation

A.A.C. R7-5-505(F) and (G) require charter holders to demonstrate, by a specified date, compliance with all issues identified after a compliance check. The Charter Holder failed, on several occasions, to timely submit documentation required to demonstrate compliance with a number of operational issues.

The Charter Holder was notified on April 19, 2019 of its required submissions to demonstrate compliance following the March 12, 2019 and given a deadline of May 20, 2019 to submit. The Charter Holder did not submit all of the required documentation by the specified deadline.

The Charter Holder’s failure to timely submit resulted in a fourth mark under the Operational Performance Framework measure that determines whether a charter holder is complying with its obligations to the Board.

Subsequently, the Charter Holder was given an extension and final deadline of June 10, 2019 to submit. The Charter Holder did not submit all of the required documentation by the specified deadline. *See Appendix G: 30 Day Failure to Submit for more detail.*

The Charter Holder’s failure to timely submit resulted in a fifth mark under the Operational Performance Framework measure that determines whether a charter holder is complying with its obligations to the Board.



On June 18, 2019, a last notification was sent to the Charter Holder outlining the remaining issues and the required documentation. *See Appendix H: 7 Day Failure to Submit for more detail*. No additional documentation has been submitted to the Board.

### 3. Other Obligations—Teacher Salary Posting

Pursuant to A.R.S. § 15-189.05, each charter school is required to prominently post teacher salary information on its website homepage. During a review conducted before the school site visit, Board staff found that the Charter Holder’s website did not have the required teacher salary posting.

The Charter Holder’s failure to post the required teacher salary information on its website resulted in a rating of “Does Not Meet Standard” for the operational performance framework measure that determines whether a charter holder is complying with other obligations.

Subsequently, after a second notification, the Charter Holder posted the required teacher salary information in compliance with A.R.S. § 15-189.05.



## **APPENDICES**

- A. Charter Holder Profile
- B. Onsite Visit Final Report
- C. Communication Timeline
- D. Program of Instruction
- E. 30 Day Failure to Submit-Program of Instruction
- F. 7 Day Failure to Submit-Program of Instruction
- G. 30 Day Failure to Submit
- H. 7 Day Failure to Submit



## Appendix A: Charter Holder Profile (Entity ID: 79926)

### Governance

The Charter Holder's corporate board also serves as the School's governing body.

#### Corporate Board Members

Robert Klem
Mary Lou Klem
Shirley Williamson

### School Profile

School Name	Lifelong Learning Academy		
Date Open	August 2002		
Location	Tucson		
Grades Served	K-8		
FY 18 Letter Grade	TBD - Alternative		
FY 18 Overall Rating	Not Reported		
	<b>FY 16</b>	<b>FY 17</b>	<b>FY 18</b>
ELA AzMERIT (13% <sup>+</sup> )	18%	N/A	N/A
Math AzMERIT (10% <sup>+</sup> )	9%	N/A	N/A

*FY 18 State Average Passing - Alternative Schools*

+

### Additional School Choices Serving Grades K-8 within 5 Miles of Lifelong Learning Academy

Total Schools	FY 18 Letter Grade	Total Charter Schools	FY 18 State Assessment Data Greater than State Average			Subgroups within (±5%) of Charter Holder's Subgroup Data		
			ELA (>41%)	Math (>41%)	Science (>52%)	FRL (±5%)	ELL (±5%)	SPED (±5%)
11	<b>A</b>	5	11	10	10	*	*	*
13	<b>B</b>	2	10	12	10	*	*	*
3	<b>C</b>	0	0	0	2	*	*	*
3	<b>D</b>	1	1	0	0	*	*	*

*\*Because the percentage of ELL, FRL, and SPED students is not available for the Charter Holder, comparison to nearby schools is not possible.*

### Schools Associated with the Charter Holder

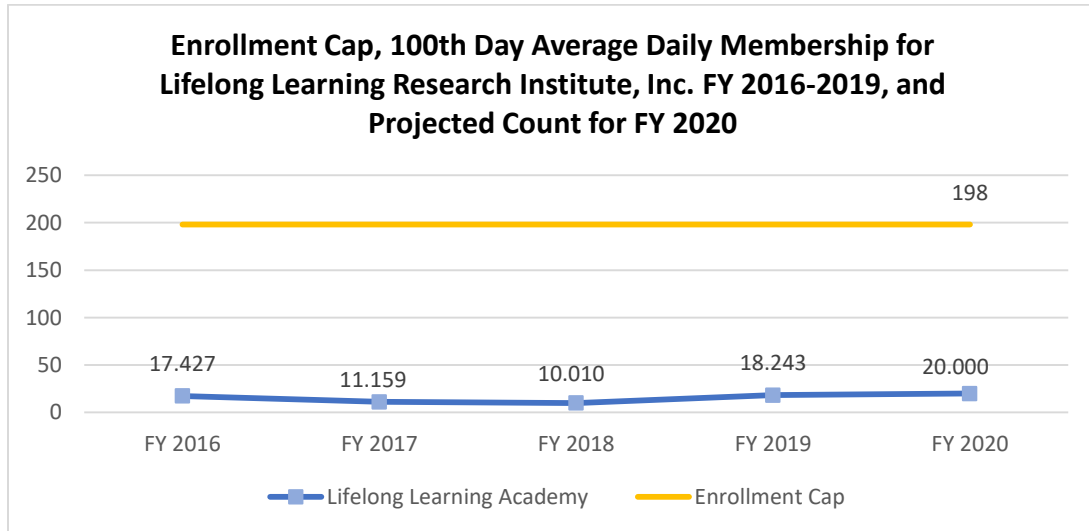
School operated by the same charter holder			
Charter Holder Name	Lifelong Learning Research Institute, Inc. (Entity ID: 90754)		
School Name	Jack Thoman Air and Space Academy and Performing Arts Studio		
FY 18 Letter Grade	F		
FY 18 Overall Rating	Falls Far Below Standard		
	<b>FY 16</b>	<b>FY 17</b>	<b>FY 18</b>
ELA AzMERIT (41% <sup>+</sup> )	32%	77%	55%
Math AzMERIT (41% <sup>+</sup> )	16%	82%	30%
Science AIMS (52% <sup>+</sup> )	N/A	N/A	N/A

*<sup>+</sup>FY 18 State Average Passing*



## Enrollment and Demographic Data

100th Day Average Daily Membership for FY 2016–FY 2019, and FY 2020 Estimated Counts ADM as of August 1, 2019.



No Demographic Data was available for the Charter Holder in FY2018.

No data was available for the percentage of students served by the Charter Holder in FY 2017–2018 who are classified as students eligible for Free or Reduced-Price Lunch, English Language Learners, and Special Education.

## Academic Performance Dashboard

### Lifelong Learning Academy

	FY 2017		FY 2018	
	Alternative		Alternative	
	Elementary K-7		Elementary K-8	
	Measure	Rating	Measure	Rating
1a. A-F Letter Grade	TBD	TBD	TBD	TBD
1b. School Improvement	No	Meets	No	Meets
<b>OVERALL RATING</b>	Not Reported*		Not Reported*	

\*An overall rating was not calculated because the school did not receive an A-F letter grade and was not identified for school improvement.

## Financial Performance Dashboard

Financial Performance						
Lifelong Learning Research Institute, Inc.			Interpreting the Financial Performance Dashboard			
	Fiscal Year 2017			Fiscal Year 2018		
	Near-Term Measures					
<b>Going Concern</b>	No	Meets		No	Meets	
<b>Unrestricted Days Liquidity</b> <small>&lt;30, but ≥15: Does Not Meet &lt;15: Falls Far Below</small>	48.75	Meets		27.46	Does Not Meet	
<b>Default</b>	No	Meets		No	Meets	
	Sustainability Measures*					
<b>Net Income</b> <small>≤0: Does Not Meet</small>	\$57,651	Meets		(\$49,700)	Does Not Meet	
<b>Fixed Charge Coverage Ratio</b> <small>&lt;1.10: Does Not Meet</small>	2.25	Meets		0.67	Does Not Meet	
<b>Cash Flow (3-Year Cumulative)</b> <small>Negative: Does Not Meet**</small>	(\$97)	Does Not Meet		(\$14,548)	Does Not Meet	
<b>Cash Flow Detail by FY</b>	FY 2017	FY 2016	FY 2015	FY 2018	FY 2017	FY 2016
	(\$4,792)	\$14,770	(\$10,075)	(\$24,526)	(\$4,792)	\$14,770
<b>Meets Board's Financial Performance Expectations</b>						
	* Negative numbers indicated by parentheses. ** Target effective beginning with FY16 audits.					

## Operational Performance Dashboard

Measure	2016	2017	2018	2019	2020
1.a. Does the delivery of the education program and operation reflect the essential terms of the educational program as described in the charter contract?	Meets	Meets	Meets	Does Not Meet	--
1.b. Does the charter holder adhere with applicable education requirements defined in state and federal law?	Meets	Meets	Does Not Meet	Does Not Meet	--
2.a. Do the charter holder's annual audit reporting packages reflect sound operations?	Meets	Meets	Meets	Meets	--
2.b. Is the charter holder administering student admission and attendance appropriately?	Meets	Meets	Meets	Does Not Meet	--
2.c. Is the charter holder maintaining a safe environment consistent with state and local requirements?	Meets	Meets	Meets	Does Not Meet	--
2.d. Is the charter holder transparent in its operations?	Meets	Meets	Meets	Does Not Meet	--
2.e. Is the charter holder complying with its obligations to the Board?	Meets	Meets	Meets	Does Not Meet	--
2.f. Is the charter holder complying with reporting requirements of other entities to which the charter holder is accountable?	Meets	Meets	Does Not Meet	Meets	--
3. Is the charter holder complying with all other obligations?	Meets	Meets	Meets	Does Not Meet	--
<b>OVERALL RATING</b>	Meets Operational Standard	Meets Operational Standard	Meets Operational Standard	Does Not Meet Operational Standard	--
<b>BOARD EXPECTATIONS</b>	--	Meets Operational Expectations	Meets Operational Expectations	Does Not Meet Operational Expectations	Does Not Meet Operational Expectations

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## Operational Performance Dashboard (Expanded)

Measure	2016	2017	2018	2019	2020
1.a. Does the delivery of the education program and operation reflect the essential terms of the educational program as described in the charter contract?	Meets	Meets	Meets	Does Not Meet	--
Educational Program - Essential Terms	No issue identified	No issue identified	No issue identified	Program of Instruction Charter Mission* <a href="#">(more info)</a>	--
1.b. Does the charter holder adhere with applicable education requirements defined in state and federal law?	Meets	Meets	Does Not Meet	Does Not Meet	--
Services to Student with Disabilities	No issue identified	No issue identified	ADE Monitoring CAP** IDEA Funding Interrupted** <a href="#">(more info)</a>	ADE Monitoring CAP** <a href="#">(more info)</a>	--
Instructional Days/Hours	No issue identified	No issue identified	No issue identified	No issue identified	--
Data for Achievement Profile	No issue identified	No issue identified	No issue identified	No issue identified	--
Mandated Programming (State/Federal Grants)	No issue identified	No issue identified	No issue identified	No issue identified	--
2.a. Do the charter holder's annual audit reporting packages reflect sound operations?	Meets	Meets	Meets	Meets	--
Timely Submission	Yes	Yes	Yes	Yes	--
Audit Opinion	Unqualified	Unqualified	Unqualified	Unqualified	--
Completed 1st Time CAPs	No issue identified	No issue identified	No issue identified	No issue identified	--
Second-Time/Repeat CAP	No issue identified	No issue identified	No issue identified	No issue identified	--
Serious Impact Findings	No issue identified	No issue identified	No issue identified	No issue identified	--
Minimal Impact Findings (3+ Years)	No issue identified	No issue identified	No issue identified	No issue identified	--
2.b. Is the charter holder administering student admission and attendance appropriately?	Meets	Meets	Meets	Does Not Meet	--
Estimated Count/Attendance Reporting	No issue identified	No issue identified	No issue identified	No issue identified	--
Tuition and Fees	No issue identified	No issue identified	No issue identified	No issue identified	--
Public School Tax Credits	No issue identified	No issue identified	No issue identified	No issue identified	--
Attendance Records	No issue identified	No issue identified	No issue identified	No issue identified	--
Enrollment Processes	No issue identified	No issue identified	No issue identified	Enrollment Practices #1* <a href="#">(more info)</a>	--
2.c. Is the charter holder maintaining a safe environment consistent with state and local requirements?	Meets	Meets	Meets	Does Not Meet	--



Facility/Insurance Documentation	No issue identified	No issue identified	No issue identified	No issue identified	--
Fingerprinting	No issue identified	No issue identified	No issue identified	Fingerprinting - Staff (more info)	--
2.d. Is the charter holder transparent in its operations?	Meets	Meets	Meets	Does Not Meet	--
Academic Performance Notifications	No issue identified	No issue identified	No issue identified	Parent Notification - Letter Grade* (more info)	--
Teacher Resumes	No issue identified	No issue identified	No issue identified	No issue identified	--
Open Meeting Law	No issue identified	No issue identified	No issue identified	Substantiated Complaint* Meeting Minutes (Site Visit)* (more info)	--
Board Alignment	No issue identified	No issue identified	No issue identified	No issue identified	--
2.e. Is the charter holder complying with its obligations to the Board?	Meets	Meets	Meets	Does Not Meet	--
Timely Submissions	No issue identified	No issue identified	No issue identified	Complaint Response2* Complaint Response* 7-day Requirement Failure to Submit* School Name Change Amendment 30-day Requirement Failure to Submit* 7-day Requirement Failure to Submit (more info)	--
Limited Substantiated Complaints	No issue identified	No issue identified	No issue identified	No issue identified	--
Favorable Board Actions	No issue identified	No issue identified	No issue identified	No issue identified	--
2.f. Is the charter holder complying with reporting requirements of other entities to which the charter holder is accountable?	Meets	Meets	Does Not Meet	Meets	--
Arizona Corporation Commission	No issue identified	No issue identified	No issue identified	No issue identified	--
Arizona Department of Economic Security	No issue identified	No issue identified	No issue identified	No issue identified	--
Arizona Department of Education	No issue identified	No issue identified	Move On When Reading Literacy Plan** (more info)	No issue identified	--
Arizona Department of Revenue	No issue identified	No issue identified	No issue identified	No issue identified	--
Arizona State Retirement System	No issue identified	No issue identified	No issue identified	No issue identified	--

Equal Employment Opportunity Commission	No issue identified	No issue identified	No issue identified	No issue identified	--
Industrial Commission of Arizona	No issue identified	No issue identified	No issue identified	No issue identified	--
Internal Revenue Service	No issue identified	No issue identified	No issue identified	No issue identified	--
U.S. Department of Education	No issue identified	No issue identified	No issue identified	No issue identified	--
3. Is the charter holder complying with all other obligations?	Meets	Meets	Meets	Does Not Meet	--
Judgments/Court Orders	No issue identified	No issue identified	No issue identified	No issue identified	--
Other Obligations	No issue identified	No issue identified	No issue identified	A.R.S. §15-189.05 Teacher Salary* (more info)	--
<b>OVERALL RATING</b>	Meets Operational Standard	Meets Operational Standard	Meets Operational Standard	Does Not Meet Operational Standard	--
<b>BOARD EXPECTATIONS</b>	--	Meets Operational Expectations	Meets Operational Expectations	Does Not Meet Operational Expectations	Does Not Meet Operational Expectations

Last Updated: 2019-07-31 10:49:18



# Appendix B: Site Visit Report

## Onsite Visit Final Report

### CHARTER INFORMATION

Charter Holder Name	Lifelong Learning Research Institute, Inc.	School Name	Lifelong Learning Academy
Charter Holder Entity ID	79926	Site Visit Date	March 12, 2019
		Final Report Date	April 19, 2019

In accordance with A.R.S. §15-182(E)(1), the Arizona State Board for Charter Schools (“Board”) shall exercise general supervision over charter schools sponsored by the Board. On March 12, 2019, Board staff conducted an unannounced site visit to Lifelong Learning Academy (“the School”). The unannounced site visit was prompted by information presented to the Board. During the site visit, Board staff met with Board Member, Robert Klem, and Front Office Manager and Board Member, Shirley Williamson.

### School Background

School Name	Month/ Year Open	Location	ADM*	Grade Levels Served
Lifelong Learning Academy	August/2002	Tucson	18.24	K-8

\*ADM as of 4/3/19

### Contractual Compliance Review

Specific areas of the charter contract were reviewed to ensure the Charter Holder is in compliance. When Board staff identifies contractual or legal non-compliance issues at a site visit, each issue is reflected on the Charter Holder’s Operational Performance Dashboard. The table below identifies the contractual or legal compliance components that are out of compliance and specifies what the Charter Holder is required to submit by **May 20, 2019**.

A review of a charter holder’s contractual compliance may result in additional follow-up visits from Board staff.

Failure to provide required follow-up, as described below, by **May 20, 2019** will be recorded in Measure 2.e. of the Charter Holder’s operational performance dashboard.





Additionally, failure to submit timely may result in the remaining issues being placed on a subsequent Board meeting agenda for possible disciplinary action pursuant to R7-5-505(G), in which the Board may take action, including withholding up to ten percent of the monthly state aid apportionment, issuing a notice of intent to revoke the charter, or other remedial actions.

In accordance with R7-5-501(C), if the specified deadline has not passed, Board staff may grant a charter holder an extension to the specified deadline. In order to request an extension, please send an email to [charterschoolboard@asbcs.az.gov](mailto:charterschoolboard@asbcs.az.gov).

Compliance Item	Findings	Required Submission
<p><b>Fingerprint Clearance Cards and Fingerprint Checks</b></p>	<p>Pursuant to A.R.S. §15-183(C)(5), all instructional staff members must have a valid fingerprint clearance card (“FCC”) and non-instructional staff must have been fingerprint checked through Arizona Department of Public Safety pursuant to A.R.S. §15-512.</p> <p>At the site visit, Board staff observed Ms. James, a volunteer parent substitute, supervising students in the computer lab. Mr. Klem was unable to provide a valid FCC to staff for Ms. James, and staff informed Mr. Klem that per statute, Ms. James was to be accompanied by a staff member who holds a valid FCC. Mr. Klem stayed with Ms. James in the computer lab after our discussion.</p> <p>The Charter Holder was unable to provide a valid FCC for Dorothy Lew, the substitute teacher.</p> <p>The Charter Holder was unable to provide the appropriate fingerprint checks for:</p> <ul style="list-style-type: none"> <li>- Bwidrik Karowa, responsible for landscaping</li> <li>- Ms. James, volunteer parent substitute</li> </ul> <p>Dorothy Lew and Bwidrik Karowa were not onsite the day of the visit.</p> <p>Recorded in Measure 2.c: Fingerprinting</p>	<p>Provide the following:</p> <ul style="list-style-type: none"> <li>- Copies of the fingerprint clearance cards or checks for the staff members that were not available for viewing on the day of the site visit.</li> <li>- A copy of the School’s policies and procedures for ensuring compliance with A.R.S. §§ 15-512 and 15-183(C)(5). <ul style="list-style-type: none"> <li>o The policy must address how the School will ensure compliance with volunteer parent substitutes.</li> </ul> </li> <li>- Confirmation that you have read A.R.S. §§15-512 and 15-183(C)(5) and the Board’s guidance document in their entirety and understand what it means to be in compliance.</li> </ul>



<p><b>Instructional Staff Education and Experience</b></p>	<p>Pursuant to A.R.S. §15-183(F), “A charter school shall keep in the personnel file of all current employees who provide instruction to pupils at the charter school information about the employee's educational and teaching background and experience in a particular academic content subject area.”</p> <p>Mr. Klem identified Jutok Rang as a paid employee with the job title of Parent Substitute. It was unclear to Board staff whether a parent substitute provides instruction in that role.</p>	<p>Provide:</p> <ul style="list-style-type: none"> <li>- A clear and concise response describing the duties and responsibilities of a Parent Substitute.</li> </ul>
<p><b>Open Meeting Law</b></p>	<p>Pursuant to A.R.S. §§38-431.01-09, the governing body meeting notices, agendas, and minutes were reviewed and are NOT in compliance with Open Meeting Law.</p> <p>At the site visit, Board staff was given the governing board minutes for the June 20, 2018, July 2, 2018, and October 15, 2018.</p> <p><b>June 20, 2018:</b></p> <ul style="list-style-type: none"> <li>- Absent and present board members not listed.</li> <li>- Motioning board member not listed on the vote to approve the FY19 Proposed Budget.</li> <li>- An accurate description of the legal action of proposing, discussing, and approving the Proposed Budget missing.</li> </ul> <p><b>July 2, 2018:</b></p> <ul style="list-style-type: none"> <li>- Absent and present board members not listed.</li> <li>- Motioning board member not listed on the vote to approve the FY19 Budget.</li> <li>- An accurate description of the legal action of proposing, discussing, and approving the Budget missing.</li> </ul> <p><b>October 15, 2018:</b></p>	<p>Provide the following:</p> <ul style="list-style-type: none"> <li>- Documentation of compliance with A.R.S. §§38-431.01(B), (C), (D) and -431.03(B) that require public meeting minutes include: <ul style="list-style-type: none"> <li>✓ Date, time, and place of meeting.</li> <li>✓ Names of members of the public body present or absent.</li> <li>✓ A general description of matters considered.</li> <li>✓ An accurate description of all legal actions proposed, discussed, or taken, and the names of members who propose each motion. The minutes shall also include the names of the persons, as given, making statements or representing material to the public body and a reference to the legal action about which they made statements or presented materials.</li> </ul> </li> <li>- Documentation of all board meeting agendas, and minutes for the 2018-2019 academic year. Ensure the documentation is in compliance with A.R.S. §§38-431.01(B), (C), (D) and -431.03(B).</li> </ul>



	<ul style="list-style-type: none"> <li>- Absent and present board members not listed.</li> <li>- Motions member not listed on the vote to approve the FY18 AFR.</li> <li>- An accurate description of the legal action of proposing, discussing, and approving the AFR missing.</li> </ul> <p>Recorded in Measure 2.d.: Open Meeting Law</p>	
<p><b>Enrollment and Attendance Policies</b></p>	<p>The following enrollment policies were reviewed and found NOT to be in compliance pursuant to Arizona Revised Statutes related to enrollment:</p> <p><b>The enrollment packet states, “Please provide the school with the following documents: ...a copy of your child’s birth certificate”</b></p> <ul style="list-style-type: none"> <li>- The enrollment policy was found to be in conflict with A.R.S. §15-828, which allows a person to provide one of the following: <ol style="list-style-type: none"> <li>1. A certified copy of the pupil's birth certificate.</li> <li>2. Other reliable proof of the pupil's identity and age, including the pupil's baptismal certificate, an application for a social security number or original school registration records and an affidavit explaining the inability to provide a copy of the birth certificate.</li> <li>3. A letter from the authorized representative of an agency having custody of the pupil pursuant to Title 8, Chapter 2 certifying that the pupil has been placed in the custody of the agency as prescribed by law.</li> </ol> </li> <li>- The enrollment policy does not indicate that a pupil enrolling in the school has the option to provide other documentation, as prescribed by statute.</li> </ul> <p><b>The enrollment packet states, “Please provide the school with the following documents: ...a copy of your child’s latest immunization</b></p>	<p>Provide:</p> <ul style="list-style-type: none"> <li>- A copy of the updated enrollment packet.</li> </ul>



**records”**

- Students can be enrolled without current or immediate proof of immunizations. A.R.S. §15-872(E) states, “...a pupil may be admitted to or allowed to attend a school if the pupil has received at least one dose of each of the required immunizations prescribed pursuant to A.R.S §36-672 and has established a schedule for the completion of required immunizations...” Homeless pupils have until the fifth calendar day after enrollment to provide proof of immunization.
- Documentary proof is not required for a pupil to be admitted to school if one of the following occurs:
  1. The parent or guardian of the pupil submits a signed statement to the school administrator stating that the parent or guardian has received information about immunizations provided by the department of health services and understands the risks and benefits of immunizations and the potential risks of non-immunization and that due to personal beliefs, the parent or guardian does not consent to the immunization of the pupil.
  2. The school administrator receives written certification that is signed by the parent or guardian and by a physician or a registered nurse practitioner that states that one or more of the required immunizations may be detrimental to the pupil's health and that indicates the specific nature and probable duration of the medical condition or circumstance that precludes immunization.

**All three questions on the PHLOTE form must be asked on the enrollment form, per R7-2-306(B) (1) and (2) (a), (b), and (c).** The enrollment form is missing the three home language survey questions.

- Note: The PHLOTE form and home language survey questions are required by code. Therefore, both the PHLOTE form and the home language survey questions elsewhere on the enrollment form must be included for compliance.



	Recorded in Measure 2.b.: Enrollment Processes	
<b>Mission Statement</b>	<p>Arizona Administrative Code R7-5-303 requires that all charters submit amendment requests to the Board through ASBCS Online when making changes to the charter contract.</p> <p>The Charter Holder’s mission on ASBCS Online was not in alignment with the operating mission on the Charter Holder’s website.</p> <p>Under “Our Mission” on the Charter Holder’s website, it states “Our mission is important and straight forward, to provide education services to the under-served children on the autistic spectrum. Understanding that every child is different – with different gifts, needs, and a unique path to success. We have a history of providing individualized education achievement through a number of proven methods . . .”</p> <p>The Charter Holder’s mission as stated on ASBCS Online is “To acknowledge each student as a life long learner To foster healthy mental, emotional, social, and physical growth during your child's pursuit for mastery of the essential skills. To support the student and family in the quest for life long learning habits. To capitalize on each child's natural curiosity for learning basic skills that align with the Arizona State Standards in Language Arts, Mathematics, Science, Social Studies, The Arts, Physical Education/Health, Technology, Native and Foreign Language, and Workplace Skills in a safely structured learning environment.”</p> <p>Because the mission statement of the School differs from the mission listed in the charter contract and the Charter Holder has not submitted an amendment to properly update the mission, the Charter Holder is in violation of its contract.</p>	<p>Provide:</p> <ul style="list-style-type: none"> <li>- Submission of an administratively complete charter mission amendment request aligning the current mission statement on the Charter Holder’s website with the mission statement on ASBCS Online.</li> </ul>
	Recorded in 1.a.: Mission	



<p><b>Program of Instruction</b></p>	<p>Arizona Administrative Code R7-5-303 requires that all charters submit amendment requests to the Board through ASBCS Online when making changes to the charter contract.</p> <p><b>Issue 1</b></p> <p>The Charter Holder’s program of instruction states, “Basic skills for K-4 students are referred to as readiness, foundations, and essentials within the Arizona State Standards and include the content areas of language arts, mathematics, science, social studies, the arts, workplace skills, health and physical education, and technology. An integrated curricular instruction approach will be used to teach these basic skills by incorporating a variety of subjects into each lesson.”</p> <p>At the site visit and on the School’s website, it was communicated to Board staff that the School provides a “K-8 model of education” for students with autism and a science, technology, engineering, and math (S.T.E.M.) curriculum. Upon review of the lesson plans and discussion with Mrs. Branch, it is not evident that the School has a specified educational program to instruct students with autism or to provide a STEM education. Additionally, the Charter Holder’s program of instruction does not address these educational models.</p> <p>As the program of instruction differs between what the School displays on its website and what is described in the charter contract and the Charter Holder has not submitted an amendment to properly update the program of instruction, the Charter Holder is in violation of its contract.</p> <p><b>Issue 2</b></p> <p>An academic documentation review was conducted by Board staff. A description of its findings is found in <a href="#">Appendix A: Program of Instruction – Lifelong Learning Academy</a>.</p> <p>Recorded in Measure 1.a.: Program of Instruction</p>	<p>Provide the following:</p> <ul style="list-style-type: none"> <li>- Submission of an administratively complete program of instruction amendment request to properly update the charter contract.</li> <li>- Evidence of a professional development plan for the 18-19 school year for the School that aligns with the program of instruction and best practices.</li> <li>- Evidence of the selected curriculum, methods of instruction and assessment that support the educational models for students with autism and STEM education.</li> <li>- Evidence of curriculum alignment with state academic standards for core content areas and grade levels for the 18-19 school year. These may include curriculum maps/guides or a scope and sequence.</li> </ul>
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<p><b>Teacher Salary Posting</b></p>	<p>The School’s website was reviewed and found it NOT to be in compliance with A.R.S. §15-189.05.</p> <p>This statute requires each charter school to prominently post the following information on its website home page separately from its budget:</p> <ul style="list-style-type: none"> <li>- The average salary of all teachers employed by the charter school for the current year.</li> <li>- The average salary of all teachers employed by the charter school for the previous year.</li> <li>- The dollar increase in the average salary of all teachers employed by the charter school for the current year.</li> <li>- The percentage increase in the average salary of all teachers employed by the charter school for the current year</li> </ul> <p>All of the requirements described above were not found on the School’s website.</p>	<p>Provide:</p> <ul style="list-style-type: none"> <li>- A screenshot of or link to the updated website home page with the required teacher salary posting.</li> </ul>
	<p>Recorded in Measure 3: Other – Teacher Salary Posting</p>	



<p><b>Academic Performance Notifications</b></p>	<p>School staff provided a 2018-2019 school calendar to Board staff. Upon review the following statement was found at the bottom of the page: “AZ LEARNS is a State RANKING system for ALL Public Schools. It has awarded an ‘A’ Label to our School for Excellence In Education.” The School was issued an “F” letter grade for the 2017-2018 school year.</p> <p>Pursuant to A.R.S §15-114, charter schools “shall not display any achievement, classification or ranking that was assigned by a public or private entity after the achievement, classification or ranking is no longer current unless the year of issuance of the achievement, classification or ranking is prominently displayed.” AZ Learns is no longer the system by which the Department of Education rates public schools. Schools are issued letter grades based on the established evaluation system through the Department of Education.</p>	<p>Provide:</p> <ul style="list-style-type: none"> <li>- An updated copy of the school calendar removing the statement indicated.</li> </ul>
<p><b>Changes to the Contract</b></p>	<p>Arizona Administrative Code R7-5-303 requires that all charters submit amendment requests to the Board through ASBCS Online when making changes to the charter contract. The charter contract for this charter school states that the name of the school is “Lifelong Learning Academy.” During the site visit, Board staff observed that the School’s name on the building is “Air and Space Academy”. Additionally, this name is listed on the School’s website, enrollment materials, and handbook.</p> <p>Because the operating name of the school differs from the name listed in the charter contract and the Charter Holder has not submitted an amendment timely to properly update the school name, the Charter Holder is in violation of its contract.</p>	<p>Provide:</p> <ul style="list-style-type: none"> <li>- Submission of an administratively complete school name change amendment request to properly update the charter contract.</li> </ul>
	<p>Recorded in Measure 2.d.: Academic Performance Notifications</p>	
	<p>Recorded in Measure 2.e.: Timely Submissions</p>	





## Appendix A: Program of Instruction – Lifelong Learning Academy

On the day of the site visit the School was administering the Galileo benchmark tests to all students in grades 1 through 8. No classroom observations were conducted on that day since testing took place most of the school day. Board staff directed questions related to the School's program of instruction to Mr. Klem (a Board member and school leader for the sister school in Green Valley). Mr. Klem indicated that those questions should be directed to Mrs. Klem, who was not available the day of the site visit, and he also referred Board staff to speak with the teacher of record for the students in grades 1 through 8, Mrs. Shelby Branch.

### **Academic Documentation Review**

At the site visit, Mrs. Branch displayed the instructional resources that guide the implementation of her lesson plans. These include: Math and ELA Common Core Progress, Morning Jumpstarts for Phonics and Reading. For science and social studies, she uses several online resources. Additionally, Mrs. Branch demonstrated examples of student portfolios, which include completed worksheets, graded assessments and other completed student activities. During the site visit, some students were putting together their portfolios from student work that Mrs. Branch had collected during this quarter.

Board staff reviewed the following documentation provided by Mrs. Branch:

- A classroom schedule that includes blocked time for the following grade groups: 1-2, 4-6, and 7-8. The School has no kindergarten or 3<sup>rd</sup> grade students.
- Lesson plans for the following weeks:
  - November 5-9, 2018
  - November 13-16, 2018
  - November 19-21, 2018
  - November 26-30, 2018
  - December 3-7, 2018
  - December 10-14, 2018
  - January 14-18, 2019
  - January 22-25, 2019
  - January 28-February 1, 2019
  - February 4-8, 2019
  - March 4-8, 2019

- A weekly student checklist template. According to Mrs. Branch, this form is filled out by the students throughout the week to show what work has been accomplished.

Upon review of the lesson plans, Board staff found that the plans do follow the daily schedule, however, the Arizona state standards being addressed in each lesson plan provided did not address standards for all the grade levels in all core content areas.

For example, the reading objective in the lesson plan for the week of March 4-8, 2019 stated, “Reading 4<sup>th</sup>-6<sup>th</sup>/Aleks/Phonics Group: RL.4.7, Make connections between the text of a story or drama and visual or oral presentation of the text, identifying where each version reflects specific descriptions and directions in the text. (Reading: Gilgamesh’s Quest for Immortality)”. This description indicates that the teacher meets with the 4<sup>th</sup>-6<sup>th</sup> grade group in the afternoon and is addressing the 4<sup>th</sup> grade reading standard. Standards for grades 5 and 6 were not present in the lesson plan.

Another example is found in the lesson plan for the week of January 22-25, 2019. It states, “Math 1<sup>st</sup>-2<sup>nd</sup>/Spelling City: 1.MD.3 Tell and write time in hours and half hours using analog and digital clocks (Lesson 21: Money)”. In this example, the teacher is working with the 1-2 grade group. Math standards for grade 2 were not present in the lesson plan. Similar trends are found in the eleven lesson plans reviewed.

Although the lesson plans indicated the weekly topic for science and social studies, it did not identify any specific state standard by each grade level being instructed.

Board staff also requested to view the School’s professional development plan and curriculum scope and sequence. Mrs. Branch stated that she has not participated in any professional development since she is the only teacher of record for the students at the School. Mrs. Branch displayed her Arizona state standards binder as the curriculum scope and sequence.



Appendix C: Communication Timeline (Entity ID: 79926)

<b>August 15, 2018</b>	The Charter Holder was notified of a complaint filed on August 14, 2018 against the School. The Charter Holder was given a deadline of <b>August 29, 2018</b> to submit a response. - The Charter Holder responded September 6, 2018.
<b>October 1, 2018</b>	Board staff requested further follow up information from the Charter Holder related to the August 14, 2018 complaint. The Charter Holder was given a deadline of <b>October 16, 2018</b> to provide the required follow up.
<b>October 17, 2018</b>	Board staff notified the Charter Holder of its 10 Day Failure to Submit the required follow up information by the October 16, 2018 deadline. The Charter Holder was given a final deadline of <b>October 22, 2018</b> to submit the information.
<b>October 25, 2018</b>	Board staff notified the Charter Holder of its 7 Day Failure to Submit the required follow up information by the October 22, 2018 deadline. As a final opportunity, the Charter Holder was given until <b>November 1, 2018</b> to submit before being placed on a subsequent Board agenda.
<b>October 29, 2018</b>	The Charter Holder responded via their lawyer, Deanna Rader. Ms. Rader stated that the Charter Holder had not received the previous notifications regarding the complaint and provided the necessary follow up information.
<b>February 8, 2019</b>	ADE notified the Charter Holder of the noncompliance issues found during an on-site monitoring of the School's special education program. The Charter Holder was given until <b>April 8, 2019</b> to submit the necessary documentation outlined in the notification for compliance.
<b>March 12, 2019</b>	Board staff conducted an unscheduled school site visit to Lifelong Learning Academy in Tucson.
<b>April 19, 2019</b>	Board staff emailed Mary Lou Klem, Authorized Charter Representative, notifying her that the Onsite Visit Final Report ("report") was available on the ASBCS Online system. Board staff marked the Charter Holder's dashboard for each non-compliance issue identified in the report. The Charter Holder was given a deadline of <b>May 20, 2019</b> to submit the required documentation detailed in the report.
<b>May 20, 2019</b>	Mr. Klem emailed Board staff to request an extension. The email stated, "We are working to address all issues from your final report. We will be sending some of the documentation today, however, some require 3rd parties to complete. I am asking for a short extension to complete all items on your list." The extension was approved, and the Charter Holder was given an extended deadline of <b>May 24, 2019</b> contingent on the submission of some documentation by the end of the day, <b>May 20, 2019</b> .
<b>May 20, 2019</b>	Mr. Klem submitted the following documentation: an explanation of the FCC availability for staff/volunteers, instructional staff education and experience explanation, revised meeting minutes, revised enrollment and registration documents, a mission statement explanation, an explanation of the teacher salary posting, a revised school calendar, and an explanation of the school name change status.
<b>May 28, 2019</b>	Mr. Klem submitted a screenshot of the school's website to demonstrate compliance with A.R.S. § 15-189.05 (teacher salary posting).



<b>May 29, 2019</b>	Mr. Klem submitted curriculum documentation. Staff responded stating that all submissions were under review.
<b>June 3, 2019</b>	Board staff notified Charter Holder of its 30-day Failure to Submit the required documentation from the report. About half of the violations were not sufficiently addressed by the original deadline. The failure to submit was recorded on the Charter Holder's operational dashboard The Charter Holder was given a final deadline of <b>June 10, 2019</b> to correct the outstanding noncompliance issues. <ul style="list-style-type: none"> <li>- Program of Instruction requirements were addressed under a separate cover.</li> </ul>
<b>June 10, 2019</b>	Mr. Klem submitted a screenshot of the school's revised teacher salary posting in accordance with A.R.S. § 15-189.05.
<b>June 18, 2019</b>	Board staff notified Charter Holder of its 7-day Failure to Submit the required documentation from the report. Most of the violations were not sufficiently addressed by the original deadline. The failure to submit was recorded on the Charter Holder's operational dashboard The Charter Holder was notified in the letter that it would be placed on a subsequent Board meeting agenda.
<b>June 19, 2019</b>	Board staff notified Charter Holder of its 30-day Failure to Submit the required Program of Instruction documentation from the report. The failure to submit was recorded on the Charter Holder's operational dashboard. The Charter Holder was given a deadline of <b>June 26, 2019</b> to submit the required Program of Instruction documentation.
<b>July 5, 2019</b>	Board staff notified Charter Holder of its 7-day Failure to Submit the required Program of Instruction documentation from the report. The failure to submit was recorded on the Charter Holder's operational dashboard. The Charter Holder was notified in the letter that it would be placed on a subsequent Board agenda.
<b>July 31, 2019</b>	Board staff notified Charter Holder of its Failure to Meet Operational Expectations. The Charter Holder was notified that it would be placed on the September Board agenda for disciplinary action. The notification was also sent to the email addresses of the Charter Holder's lawyer and Mr. Klem.
<b>August 1, 2019</b>	Board staff called the Charter Representative and left a message with the School's front office manager, board member Shirley Williamson. Board staff attempted to reach the Charter Representative on her cell phone, but was unable to leave a voicemail.
<b>August 6, 2019</b>	Board staff called the Charter Holder's lawyer, Deana Rader, and left a voicemail.



## Appendix A: Program of Instruction – Lifelong Learning Academy

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### **Academic Documentation Review**

At the site visit, Mrs. Branch displayed the instructional resources that guide the implementation of her lesson plans. These include: Math and ELA Common Core Progress, Morning Jumpstarts for Phonics and Reading. For science and social studies, she uses several online resources. Additionally, Mrs. Branch demonstrated examples of student portfolios, which include completed worksheets, graded assessments and other completed student activities. During the site visit, some students were putting together their portfolios from student work that Mrs. Branch had collected during this quarter.

Board staff reviewed the following documentation provided by Mrs. Branch:

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Upon review of the lesson plans, Board staff found that the plans do follow the daily schedule, however, the Arizona state standards being addressed in each lesson plan provided did not address standards for all the grade levels in all core content areas.

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## Arizona State Board for Charter Schools

*Physical Address:*

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Phoenix, AZ 85007  
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P.O. Box 18328  
Phoenix, AZ 85009

June 19, 2019

Lifelong Learning Research Institute, Inc.  
Mary Lou Klem, Charter Representative  
3295 West Orange Grove Road  
Tucson, AZ 85741

Sent via email: [marylou@lifelonglearningacademy.com](mailto:marylou@lifelonglearningacademy.com)

**RE: 30 Day Failure to Submit – Lifelong Learning Research Institute, Inc. – Entity ID 79926**

Dear Charter Representative,

On April 19, 2019 Lifelong Learning Research Institute, Inc. ("Charter Holder") was notified of its 30-day follow-up requirement as part of an onsite visit conducted March 12, 2019. The Charter Holder did not submit all of the required information detailed in the final report on or before the due date of May 24, 2019.

In accordance with A.A.C. R7-5-505, the Charter Holder is required to demonstrate that all identified noncompliance issues have been addressed by the specified deadline. Therefore, as a final opportunity, by June 26, 2019, the Charter Holder must address these noncompliance issues by providing the submission requirements outlined in the table below.

Failure to provide required follow-up, as described below, by **June 26, 2019** will be recorded in Measure 2.e. of the Charter Holder's operational performance dashboard.

The table below outlines the findings and review of the required submission listed for the Program of Instruction section.

Compliance Item	Findings	Required Submission
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**Program of Instruction**

Initial submission requirement:

- Submission of an administratively complete program of instruction amendment request to properly update the charter contract.
- Evidence of a professional development plan for the 18-19 school year for the School that aligns with the program of instruction and best practices.
- Evidence of the selected curriculum, methods of instruction and assessment that support the educational models for students with autism and STEM education.
- Evidence of curriculum alignment with state academic standards for core content areas and grade levels for the 18-19 school year. These may include curriculum maps/guides or a scope and sequence.

The Charter Holder submitted the following:

- An explanation from the administration that minimally addresses the following topics: curriculum used by the School, professional development needs, curriculum needs for students with autism, STEM presentations, and the use of the School’s guides of instruction.
- An explanation from the teacher of record that references the submitted slide presentation, which details the instructional resources used for math and English language arts and describes how each is aligned to State standards.  
Furthermore, the teacher provides a narrative explaining how the needs of students are addressed through individualized plans.
- A slide presentation titled, “How AZCCR Standards are Implemented”.

The submission was deemed insufficient due to not providing evidence to support the Charter Holder’s explanation of the School’s program of instruction.

Additionally, the Charter Holder did not submit an amendment to its program of instruction to include the educational models described in the Charter Holder’s explanation.

Current submission requirement:

- Submission of an administratively complete program of instruction amendment request to properly update the charter contract.
- Evidence of a professional development plan for the 18-19 school year for the School that aligns with the program of instruction and best practices.
- Evidence of the selected curriculum, methods of instruction and assessment that support the educational models for students with autism and STEM education.
- Evidence of curriculum alignment with state academic standards for Science and Social Studies for the grade levels served for the 18-19 school year. These may include curriculum maps/guides or a scope and sequence used in the 18-19 school year.





## Arizona State Board for Charter Schools

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July 5, 2019

Lifelong Learning Research Institute, Inc.  
Mary Lou Klem, Charter Representative  
3295 West Orange Grove Road  
Tucson, AZ 85741

Sent via email: [marylou@lifelonglearningacademy.com](mailto:marylou@lifelonglearningacademy.com)

**RE: 7 Day Failure to Submit – Lifelong Learning Research Institute, Inc. – Entity ID 79926**

Dear Charter Representative,

On April 19, 2019 Lifelong Learning Research Institute, Inc. ("Charter Holder") was notified of its 30-day follow-up requirement as part of an onsite visit conducted March 12, 2019. On June 19, 2019, the Charter Holder was issued a second notification outlining the missing Program of Instruction submissions based on the 30-day follow-up letter. The missing submissions were due to Board staff by June 26, 2019.

The Charter Holder did not submit all of the required information detailed in the final report on or before the due date of June 26, 2019. In accordance with A.A.C. R7-5-505, the Charter Holder is required to demonstrate that all identified noncompliance issues have been addressed by the specified deadline. The Charter Holder has not demonstrated compliance as of the issuance of this letter.

**Therefore, the Charter Holder will be placed on the August 12, 2019 Board meeting agenda for possible disciplinary action pursuant to R7-5-505(G), in which the Board may take action, including withholding up to ten percent of the monthly state aid apportionment, issuing a notice of intent to revoke the charter, or other remedial actions.**

**Further, because the Charter Holder is currently out of compliance with the terms of its contract until the issues identified below are addressed, any requests submitted that are not addressing the issues will be rejected and closed until the noncompliance issues have been addressed.**

**The table below outlines the outstanding noncompliance issues:**

Compliance Item

Findings

Required Submission

<p><b>Program of Instruction</b></p>	<p>Initial submission requirement:</p> <ul style="list-style-type: none"> <li>• Submission of an administratively complete program of instruction amendment request to properly update the charter contract.</li> <li>• Evidence of a professional development plan for the 18-19 school year for the School that aligns with the program of instruction and best practices.</li> <li>• Evidence of the selected curriculum, methods of instruction and assessment that support the educational models for students with autism and STEM education.</li> <li>• Evidence of curriculum alignment with state academic standards for Science and Social Studies for the grade levels served for the 18-19 school year. These may include curriculum maps/guides or a scope and sequence used in the 18-19 school year.</li> </ul> <p><u>The Charter Holder did not submit any of the required documentation.</u></p>	<p>Current submission requirement:</p> <ul style="list-style-type: none"> <li>• Submission of an administratively complete program of instruction amendment request to properly update the charter contract.</li> <li>• Evidence of a professional development plan for the 18-19 school year for the School that aligns with the program of instruction and best practices.</li> <li>• Evidence of the selected curriculum, methods of instruction and assessment that support the educational models for students with autism and STEM education.</li> <li>• Evidence of curriculum alignment with state academic standards for Science and Social Studies for the grade levels served for the 18-19 school year. These may include curriculum maps/guides or a scope and sequence used in the 18-19 school year.</li> </ul>
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June 3, 2019

Lifelong Learning Research Institute, Inc.  
Mary Lou Klem, Charter Representative  
3295 West Orange Grove Road  
Tucson, AZ 85741

Sent via email: [marylou@lifelonglearningacademy.com](mailto:marylou@lifelonglearningacademy.com)

**RE: 30 Day Failure to Submit – Lifelong Learning Research Institute, Inc. – Entity ID 79926**

Dear Charter Representative,

On April 19, 2019 Lifelong Learning Research Institute, Inc. ("Charter Holder") was notified of its 30-day follow-up requirement as part of an onsite visit conducted March 12, 2019. The Charter Holder did not submit all of the required information detailed in the final report on or before the due date of May 24, 2019. As a result of not submitting timely, the Charter Holder's operational performance dashboard has been recorded to reflect Measure 2.e.: Timely Submission.

In accordance with A.A.C. R7-5-505, the Charter Holder is required to demonstrate that all identified noncompliance issues have been addressed by the specified deadline. Therefore, as a final opportunity, by June 10, 2019, the Charter Holder must address these noncompliance issues by providing the submission requirements outlined in the table below.

Failure to provide required follow-up, as described below, by **June 10, 2019** will be recorded in Measure 2.e. of the Charter Holder's operational performance dashboard.

Additionally, failure to submit timely may result in the remaining issue(s) being placed on a subsequent Board meeting agenda for possible disciplinary action pursuant to R7-5-505(G), in which the Board may take action, including withholding up to ten percent of the monthly state aid apportionment, issuing a notice of intent to revoke the charter, or other remedial actions.

The table below outlines the outstanding noncompliance issues. The findings and review of the required submission listed for the Program of Instruction section will be addressed under a separate cover.

Compliance Item

Findings

Required Submission

<p><b>Teacher Salary Posting</b></p>	<p>Initial submission requirement:</p> <ul style="list-style-type: none"> <li>• A screenshot of or link to the updated website home page with the required teacher salary posting.</li> </ul> <p><u>The submission was deemed insufficient because the teacher salary posting submitted is missing the correct information. The website post details the salary for each teaching position at the school rather than the average salary of all teachers, the dollar increase from 2018 to 2019, and the percentage increase from 2018 to 2019.</u></p> <p><u>Additionally, the posting does not clearly delineate the <b>average</b> teacher salary for Lifelong Learning Academy separate from the sister school, Jack Thoman Air and Space Academy. Each school is required to have its own information posted.</u></p>	<p>Current submission requirement:</p> <ul style="list-style-type: none"> <li>• A screenshot of or link to the updated website home page with the required teacher salary posting for Lifelong Learning Academy, including the following information per A.R.S. § 15-189.05 <ul style="list-style-type: none"> <li>○ The average salary of all teachers employed by the charter school for the current year.</li> <li>○ The average salary of all teachers employed by the charter school for the previous year.</li> <li>○ The dollar increase in the average salary of all teachers employed by the charter school for the current year.</li> <li>○ The percentage increase in the average salary of all teachers employed by the charter school for the current year.</li> </ul> </li> </ul>
<p><b>Fingerprint Clearance Cards (FCCs) and Fingerprint Checks</b></p>	<p>Initial submission requirement:</p> <ul style="list-style-type: none"> <li>• Copies of the fingerprint clearance cards (“FCC”) or checks for the staff members that were not available for viewing on the day of the site visit.</li> <li>• A copy of the School’s policies and procedures for ensuring compliance with A.R.S. §§ 15-512 and 15-183(C)(5). <ul style="list-style-type: none"> <li>○ The policy must address how the School will ensure compliance with volunteer parent substitutes.</li> </ul> </li> <li>• Confirmation that you have read A.R.S. §§15-512 and 15-183(C)(5) and the Board’s guidance document in their entirety and understand what it means to be in compliance.</li> </ul> <p><u>The Charter Holder submitted the following:</u></p> <ul style="list-style-type: none"> <li>• <u>An explanation indicating that Mr. Karowa “is not responsible for landscaping for the school” and had only visited the school</u></li> </ul>	<p>Current submission requirement:</p> <ul style="list-style-type: none"> <li>• A copy of a valid FCC for Dorothy Lew.</li> <li>• A copy of the School’s policies and procedures for ensuring compliance with A.R.S. §§ 15-512 and 15-183(C)(5). <ul style="list-style-type: none"> <li>○ The policy must address how the School will ensure compliance with parent volunteers.</li> </ul> </li> </ul>

	<p><u>once to trim bushes.</u></p> <ul style="list-style-type: none"> <li>• <u>An explanation indicating that the School does not have a position of a volunteer parent substitute. Instead, Ms. James is a parent volunteer that signs the volunteer log book when visiting the School. The narrative states, “The charter understands that Ms. James will need a FCC if she leaves the main classroom (or area of direct supervision) to go to the computer lab with students. This will apply to all volunteers on the School site.”</u></li> <li>• <u>An explanation stating the Ms. Lew’s FCC is current and included in the submission. However, no FCC for Ms. Lew was found.</u></li> </ul> <p><u>The submission was deemed insufficient due to the following:</u></p> <ul style="list-style-type: none"> <li>• <u>Missing valid FCC for Dorothy Lew, a substitute teacher</u></li> <li>• <u>A copy of the School’s policies and procedures ensuring compliance with fingerprinting requirements</u></li> </ul>	
<p><b>Instructional Staff Education and Experience</b></p>	<p>Initial submission requirement:</p> <ul style="list-style-type: none"> <li>• A clear and concise response describing the duties and responsibilities of a Parent Substitute.</li> </ul> <p><u>The Charter Holder provided an explanation stating “Ms. Rang is not a parent substitute. We do not have any job in our School that allows parents to be classroom substitutes.”</u></p> <p><u>At the site visit, Mr. Klem identified Jutok Rang as a paid employee with the job title of Parent Substitute.</u></p> <p><u>The submission was deemed insufficient because the Charter Holder has not addressed what the correct job title and description Ms. Rang holds. It was clear at the site visit that Ms. Rang is a paid employee.</u></p>	<p>Current submission requirement:</p> <ul style="list-style-type: none"> <li>• Jutok Rang’s job title and description of her role and responsibilities at the School.</li> </ul>
<p><b>Changes to the Contract</b></p>	<p>Initial submission requirement:</p> <ul style="list-style-type: none"> <li>• Submission of an administratively complete school name change amendment request to properly update the charter contract.</li> </ul>	<p>Current submission requirement:</p> <ul style="list-style-type: none"> <li>• Proof of the change in electronic signage on the school building</li> </ul>

The Charter Holder submitted a narrative in response that states:

“Name of School:

- Lifelong Learning Academy will not be changing its Charter contract.
- Our official name will remain Lifelong Learning Academy.
- We are making arrangements to use only the electronic signage.”

The submission was deemed insufficient due to the following:

- Proof of the aforementioned signage change on the school building has not been submitted.
- The school is currently operating under the name “Air and Space Academy” on its website, [airandspaceacademyaz.com](http://airandspaceacademyaz.com)

- Clarification of the school name on the website.
  - The website indicates that both Lifelong Learning Academy and sister school, Jack Thoman Air and Space Academy, are named “Air and Space Academy”
  - The website needs to clearly delineate between the schools, including name differences, average teacher salary posting, enrollment, etc.



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June 18, 2019

Lifelong Learning Research Institute, Inc.  
Mary Lou Klem, Charter Representative  
3295 West Orange Grove Road  
Tucson, AZ 85741

Sent via email: [marylou@lifelonglearningacademy.com](mailto:marylou@lifelonglearningacademy.com)

**RE: 7 Day Failure to Submit – Lifelong Learning Research Institute, Inc. – Entity ID 79926**

Dear Charter Representative,

On May 19, 2019, Lifelong Learning Research Institute, Inc. ("Charter Holder") was notified of its 30-day follow-up requirement as part of an onsite visit conducted March 12, 2019. On June 3, 2019, the Charter Holder was issued a second notification outlining the missing submissions based on the 30 day follow-up letter. The missing submissions were due to Board staff by June 10, 2019. Board staff received documentation from the Charter Holder in response to the second notification on June 10, 2019.

Upon reviewing these submissions, Board staff determined that the Charter Holder did not submit all of the required information detailed in the June 3, 2019 notification letter. As a result of not submitting timely, the Charter Holder's operational performance dashboard has been recorded to reflect Measure 2.e.: Timely Submission.

In accordance with A.A.C. R7-5-505, the Charter Holder is required to demonstrate that all identified noncompliance issues have been addressed by the specified deadline. The Charter Holder has not demonstrated compliance as of the issuance of this letter.

**Therefore, the Charter Holder will be placed on the August 12, 2019 Board meeting agenda for possible disciplinary action pursuant to R7-5-505(G), in which the Board may take action, including withholding up to ten percent of the monthly state aid apportionment, issuing a notice of intent to revoke the charter, or other remedial actions.**

**Further, because the Charter Holder is currently out of compliance with the terms of its contract until the issues identified below are addressed, any requests submitted that are not addressing the issues will be rejected and closed until the noncompliance issues have been addressed.**

**The table below outlines the outstanding noncompliance issues:**

Compliance Item	Findings	Required Submission
<b>Fingerprint Clearance Cards (FCCs) and Fingerprint Checks</b>	<p>Initial submission requirement:</p> <ul style="list-style-type: none"> <li>• A copy of a valid FCC for Dorothy Lew.</li> <li>• A copy of the School’s policies and procedures for ensuring compliance with A.R.S. §§ 15-512 and 15-183(C)(5). <ul style="list-style-type: none"> <li>○ The policy must address how the School will ensure compliance with parent volunteers.</li> </ul> </li> </ul> <p><u>The submission was deemed insufficient due to the following:</u></p> <ul style="list-style-type: none"> <li>• <u>Missing valid FCC for Dorothy Lew, a substitute teacher</u></li> <li>• <u>A copy of the School’s policies and procedures ensuring compliance with fingerprinting requirements</u></li> </ul>	<p>Current submission requirement:</p> <ul style="list-style-type: none"> <li>• A copy of a valid FCC for Dorothy Lew.</li> <li>• A copy of the School’s policies and procedures for ensuring compliance with A.R.S. §§ 15-512 and 15-183(C)(5). <ul style="list-style-type: none"> <li>○ The policy must address how the School will ensure compliance with parent volunteers.</li> </ul> </li> </ul>
<b>Instructional Staff Education and Experience</b>	<p>Initial submission requirement:</p> <ul style="list-style-type: none"> <li>• Jutok Rang’s job title and description of her role and responsibilities at the School.</li> </ul> <p><u>The submission was deemed insufficient because the Charter Holder has not addressed what the correct job title and description Ms. Rang holds. It was clear at the site visit that Ms. Rang is a paid employee.</u></p>	<p>Current submission requirement:</p> <ul style="list-style-type: none"> <li>• Jutok Rang’s job title and description of her role and responsibilities at the School.</li> </ul>
<b>Changes to the Contract</b>	<p>Initial submission requirement:</p> <ul style="list-style-type: none"> <li>• Proof of the change in electronic signage on the school building</li> <li>• Clarification of the school name on the website. <ul style="list-style-type: none"> <li>○ The website indicates that both Lifelong Learning Academy and sister school, Jack Thoman Air and Space Academy, are named “Air and Space Academy”</li> </ul> </li> </ul> <p>The website needs to clearly delineate between the schools, including name differences, average teacher salary posting, enrollment, etc.</p> <p><u>The submission was deemed insufficient due to the following:</u></p> <ul style="list-style-type: none"> <li>• <u>Proof of the aforementioned signage change on the school building has not</u></li> </ul>	<p>Current submission requirement:</p> <ul style="list-style-type: none"> <li>• Proof of the change in electronic signage on the school building</li> <li>• Clarification of the school name on the website. <ul style="list-style-type: none"> <li>○ The website indicates that both Lifelong Learning Academy and sister school, Jack Thoman Air and Space Academy, are named “Air and Space Academy”</li> </ul> </li> </ul> <p>The website needs to clearly delineate between the schools, including name differences and enrollment.</p>



been submitted.

- The school is currently operating under the name "Air and Space Academy" on its website, [airandspaceacademyaz.com](http://airandspaceacademyaz.com)