

AGENDA ITEM EXECUTIVE SUMMARY: Compliance Matters—Lifelong Learning Research Institute, Inc. (Entity ID: 90754)

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 may subject the charter holder to 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 measure 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 15-year replication charter in 2010. The Charter Holder operates one school, Jack Thoman Air and Space Academy and Performing Arts Studio (the “School”), serving grades K-8 in Sahuarita.

For FY 2020, the Charter Holder is reporting an estimated count of 22 students as of August 14, 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 January 8, 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, and the Charter Holder’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 reporting requirements to the Arizona Department of Education (“ADE”) concerning the School’s school improvement designation and had a complaint substantiated due to violations with Open Meeting Law. Additionally, the Charter Holder signed an F School Consent Agreement in FY 2019 due to receiving an “F” letter grade.

During the school site visit, Board staff met with 4th grade teacher, Ms. Andrea Joseph. Robert Klem, School director and corporate and school governing board member, was not on site the day of the visit. Board staff communicated briefly with charter representative and corporate and school governing board member, Mary Lou Klem, via phone call during the visit.



Both Mr. and Mrs. Klem also serve on the corporate and school governing body of Lifelong Learning Academy, 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
1.b. Services to Students with Disabilities	ADE	1. 10-17-17 2. 1-17-19	1. 10-17-18 2. 2-18-19	1. <u>Outstanding issue</u> 2. Closed June 20, 2019
2.b. Enrollment Processes	Unscheduled Site Visit ("USV")	1-8-19	2-18-19	Submitted March 13, 2019
2.c. Fingerprinting	USV	1-8-19	2-18-19	Submitted by due date
2.d. Academic Performance Notifications	USV	1-8-19	2-18-19	Submitted by due date
2.d. Teacher Resumes	USV	1-8-19	2-18-19	Submitted by due date
2.d. Board Alignment	USV	1-8-19	2-18-19	Submitted March 13, 2019
2.d. Open Meeting Law	Complaint	8-30-18	9-14-18	Complaint substantiated on December 17, 2018
2.e. Timely Submissions	USV	1-8-19	2-18-19	Submitted March 13, 2019
	USV	3-21-19	2-18-19	Submitted June 10, 2019
	Complaint	10-1-18	10-16-18	Complaint substantiated on December 17, 2018
	Complaint	10-17-18	10-22-18	Complaint substantiated on December 17, 2018
2.e. Favorable Board Actions	Board	12-5-18	12-21-18	F School Consent Agreement executed April 2, 2019
2.f. Arizona Department of Education	ADE	3-6-19	3-16-19	<u>Outstanding issue</u> , last notification sent on March 26, 2019
3. Other Obligations	USV	3-21-19	4-22-19	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.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". In separate instances, the Charter Holder has violated this statute.

On October 17, 2017, following an on-site monitoring visit, the ADE's Exceptional Student Services ("ESS") division, notified the School that it was out of compliance with the Individuals with Disabilities Education Act ("IDEA"). and issued a Corrective Action Plan ("CAP"). The Charter Holder was required to submit specified documentation to ESS within 60 days and additional documentation within one year of the date of the notification.



On October 26, 2018, the Charter Holder was notified by ESS that it had not submitted the required documentation by the October 17, 2018 deadline, and that the Charter Holder's "federal IDEA payments [would] be interrupted until such time as adequate compliance is achieved and the corrective action plan is closed out."

Due to its failure to comply with A.R.S. § 15-183(E)(7), the Charter Holder was rated a "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.

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

On January 17, 2019, ADE's Dispute Resolution division notified the Charter Representative that the School was out of compliance with IDEA following a complaint investigation. The complaint was substantiated by Dispute Resolution, and the School was issued a CAP.

The Charter Holder was required to submit specified documentation to ADE to satisfy the outlined requirements in the CAP by February 18, 2019 and separate requirements by March 4, 2019.

The Charter Holder's failure to comply with A.R.S. § 15-183(E)(7) resulted in a second mark under the Operational Performance Framework measure that determines a charter holder adheres with applicable education requirements defined in state and federal law.

The complaint was substantiated and closed June 20, 2019.

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, the Board identified the following violations regarding enrollment practices:

- 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 questions on the enrollment form.
- A.R.S. § 15-828(G) places the responsibility of requesting a pupil's record on the enrolling school and states that the request must be made directly to the previous school and within five days after enrollment. The School's enrollment packet required students to provide discipline information other than expulsion history.
- In addition, Arizona law does not provide that suspension or retention may be a basis for determining enrollment eligibility. A.R.S. § 15-184.
- 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 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 “[a]ll 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”).

During the school site visit, School staff was unable to provide a valid FCC for the special education teacher who was not on site at the time of the visit.

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 submitted the required valid FCC for the identified staff member.

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 indicate the year for which the “A” rating had been earned.

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 removed the statement from the School’s current calendar.

2.d. Board Alignment

Pursuant to A.A.C. R7-5-505(C), Board staff may conduct a compliance check of a charter holder’s operational performance at any time. Compliance checks are conducted before a site visit. For the purpose of a compliance check, a charter holder is in compliance if any measure on its operational dashboard rated ‘Does Not Meet Standard’ or ‘Falls Far Below Standard’ in the current year and/or the prior fiscal year has been addressed, the charter holder is in “good standing” with the Arizona Corporation Commission (“ACC”), and the charter holder is maintaining alignment between the principals identified in the charter contract and with the ACC.

During the compliance check conducted before the school site visit, Board staff found that the Charter Holder’s board members as reported through ASBCS Online and with the ACC were not aligned.

Due to its failure to maintain alignment between the principals identified in the charter contract and with the ACC, 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 filed the required documentation to align the corporate board members listed with ASBCS Online and the ACC.

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 the requirements for the notice. 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 of the Charter Holder, it indicated that these requirements had been met, therefore a complaint was filed for providing false information.

Due to its failure to comply with Open Meeting Law, 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.

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.

2.d. Teacher Resumes

A.R.S. § 15-183(F) requires a charter school to keep in the “personnel file of all current employees who provide instruction to students at the charter school information about the employee’s educational and teaching background and experience in a particular academic content subject area.”

During the school site visit, School staff was unable to provide the educational and teaching background and experience for the special education teacher.

Due to its failure to comply with A.R.S. 15-183(F), 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 provided documentation of the special education teacher’s educational and teaching background that complies with A.R.S. § 15-183(F).

2.e. Timely Submissions—Complaint Response

Pursuant to A.A.C. R7-5-507(C), a “charter holder complained against shall, within 10days 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 (see 2.d. *Open Meeting Law*), and that a response was due by August 29, 2018. The Charter Holder responded timely. Board staff reviewed the submission and requested follow-up information to be submitted by October 16, 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 an extension with 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 second 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 January 18, 2019 of its required submissions to demonstrate compliance following a site visit conducted January 8, 2019. The Charter Holder was given a deadline of February 18, 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 third 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 a final deadline of March 13, 2019 to submit. The Charter Holder then submitted all of the required documentation by the specified deadline. *See Appendix D: 30 Day Failure to Submit for more detail.*

The Charter Holder was notified on March 21, 2019 of its required submissions to demonstrate compliance with A.R.S. § 15-189.05 (*see 3. Other Obligations – Teacher Salary Posting*). The Charter Holder was given a deadline of April 22, 2019 to submit compliance. The Charter Holder did not submit all of the required documentation by the specified deadline. *See Appendix E: 7 Day Failure to Submit for more detail.*

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, on June 10, 2019, the Charter Holder posted the required teacher salary information in compliance with A.R.S. § 15-189.05

2.e. Favorable Board Actions—F-School Consent Agreement

Pursuant to A.R.S. § 15-241.02(I) and A.A.C. R7-5-602, when a charter school is assigned a letter grade of F, the Board is required to either take action to revoke the charter school's charter or restore the charter school to acceptable performance through a consent agreement.

On October 5, 2018, the Board was notified by ADE that the School was assigned a letter grade of "F" for FY 2018. At the November 13, 2018 Board meeting, the Board approved an updated consent agreement to accommodate schools assigned a letter grade of "F" in FY 2018. On April 2, 2019, the Board approved and executed the consent agreement with the Charter Holder.

The Charter Holder's failure to meet the Board's established academic performance expectations was rated "Does Not Meet Standard" for the Operational Performance Framework measure that determines a charter holder complies with its obligations to the Board.

2.f. Arizona Department of Education

Pursuant to A.R.S. § 15-241.02(J), "[t]he department of education shall evaluate a school that has been assigned a letter grade of F pursuant to section 15-241 to determine whether the school, charter holder or district school failed to properly implement its school improvement plan. . . . If the school is a charter school, the department shall submit [the] report to the sponsor of the charter school."

In FY 2019, the School was identified for comprehensive support and improvement ("CSI") by ADE due to receiving an "F" letter grade for FY 2018. Schools identified for CSI remain in support with ADE for three fiscal years, and each school has specified requirements outlined by ADE.

On March 6, 2019, ADE notified the Charter Holder of its failure to submit specific school improvement requirements by the original due date of November 1, 2018, which included a comprehensive needs assessment and analyses, an integrated action plan and worksheets, a quarterly benchmark analysis, and an integrated action plan reflection.



Due to its failure to comply with the requirements of ADE, the Charter Holder was rated a “Does Not Meet Standard” for the Operational Performance Framework measure that determines a charter holder complies with reporting requirements of other entities to which the charter holder is accountable.

Subsequently, the Charter Holder did not comply with all of its school improvement requirements in FY 2019 an additional information has been submitted to ADE. This current fiscal year brings a new set of requirements which begins with a site visit by ADE in the month of September.

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. The School shares a joint website with the Charter Holder’s sister school, Lifelong Learning Academy. During a review conducted before a site visit to Lifelong Learning Academy, Board staff found that the Charter Holder’s website did not have the required teacher salary posting for the School.

The Charter Holder’s failure to post the required teacher salary information on its website resulted in a score 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. 30 Day Failure to Submit
- E. 30 Day Failure to Submit

Appendix A: Charter Holder Profile (Entity ID: 90754)

Governance

The Charter Holder's corporate board operates separately from the School's governing body.

Corporate Board Members	School Governing Body Members	Type
Mary Lou Klem	Mary Lou Klem	Charter Organization
Robert Klem	Robert Klem	Charter Organization
Shirley Williamson	Shirley Williamson	Charter Organization
	Kathleen Angelo	Unknown
	Rebecca Jones	Unknown
	Karen Hill	Unknown
	Robert Carlin	Unknown
	Irma Celez	Unknown

School Profile

School Name	Jack Thoman Air and Space Academy and Performing Arts Studio		
Date Open	August 2010		
Location	Green Valley		
Grades Served	K-8		
FY 18 Letter Grade	F		
FY 18 Overall Rating	Falls Far Below		
	FY 16	FY 17	FY 18
ELA AzMERIT (41% ⁺)	32%	77%	55%
Math AzMERIT (41% ⁺)	16%	82%	30%
Science AIMS (52% ⁺)	N/A	N/A	N/A

⁺FY 18 State Average Passing

Additional School Choices Serving Grades K-8 within 5 Miles of Jack Thoman Air and Space Academy and Performing Arts Studio

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%)
1	A	0	1	1	1	*	*	*
2	B	1	2	2	2	*	*	*
2	C	0	1	1	0	*	*	*

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

Comparison of Nearby Schools to Jack Thoman Air and Space Academy and Performing Arts Studio

Total Schools	FY 18 Letter Grade	Total Charter Schools	FY 18 State Assessment Data Greater than Jack Thoman Air and Space Academy and Performing Arts Studio		
			AzMERIT ELA (>55%)	AzMERIT Math (>30%)	AIMS Science
1	A	0	0	1	*
2	B	1	1	2	*
2	C	0	0	1	*
Total Number of Schools Performing Better than School Name (Percentage of Total)					
5		1 (20%)	1 (20%)	4 (80%)	N/A



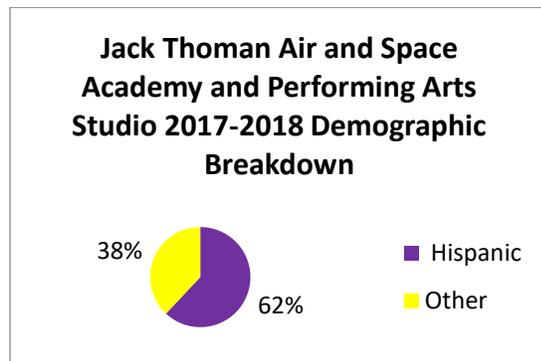
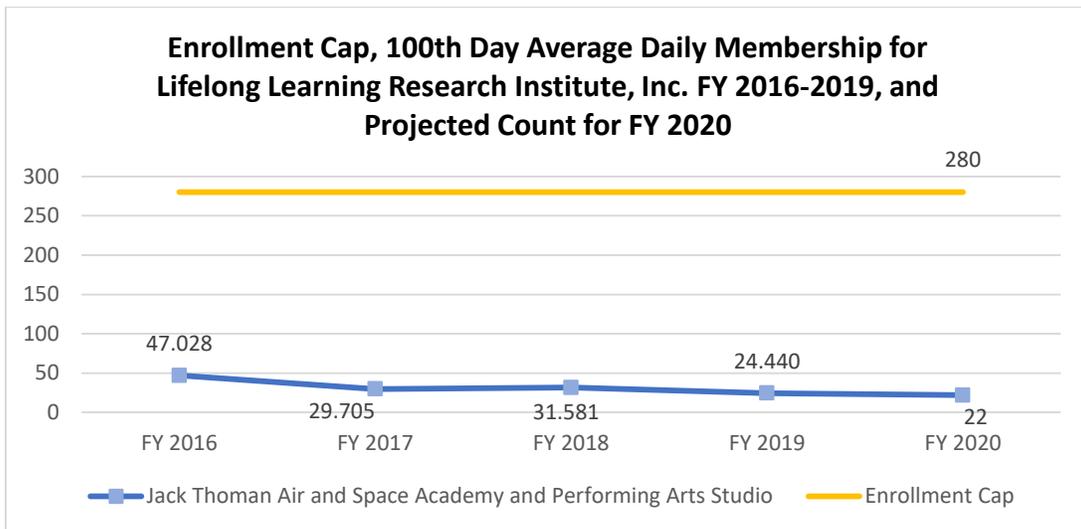
Schools Associated with the Charter Holder

School operated by the same charter holder			
Charter Holder Name	Lifelong Learning Research Institute, Inc. (Entity ID: 79926)		
School Name	Lifelong Learning Academy		
FY 18 Letter Grade	Not Reported		
FY 18 Overall Rating	Not Reported		
	FY 16	FY 17	FY 18
ELA AzMERIT (13% ⁺)	18%	N/A	N/A
Math AzMERIT (10% ⁺)	9%	N/A	N/A

+ FY 18 State Average Passing - Alternative Schools

Enrollment and Demographic Data

100th Day Average Daily Membership for FY 2016–FY 2019, and FY 2020 Estimated Counts ADM as of August 14, 2019.



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

Jack Thoman Air and Space Academy and Performing Arts Studio

	FY 2017		FY 2018	
	Traditional		Traditional	
	Elementary K-8		Elementary K-8	
	Measure	Rating	Measure	Rating
1a. A-F Letter Grade	NR	Not Rated	F	Falls Far Below
1b. School Improvement	No	Meets	Comprehensive	Falls Far Below
OVERALL RATING	Not Reported*		Falls Far Below Standard	

*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

	Fiscal Year 2017		Fiscal Year 2018	
	No	Meets	No	Meets
Going Concern				
Unrestricted Days Liquidity <small><30, but ≥15: Does Not Meet <15: Falls Far Below</small>	32.40	Meets	49.04	Meets
Default	No	Meets	No	Meets

Sustainability Measures*

	Fiscal Year 2017			Fiscal Year 2018		
	FY 2017	FY 2016	FY 2015	FY 2018	FY 2017	FY 2016
Net Income <small>≤0: Does Not Meet</small>	(\$46,794)	Does Not Meet		(\$26,622)	Does Not Meet	
Fixed Charge Coverage Ratio <small><1.10: Does Not Meet</small>	(0.57)	Does Not Meet		0.74	Does Not Meet	
Cash Flow (3-Year Cumulative) <small>Negative: Does Not Meet**</small>	(\$136,180)	Does Not Meet		(\$84,481)	Does Not Meet	
Cash Flow Detail by FY	FY 2017	FY 2016	FY 2015	FY 2018	FY 2017	FY 2016
	\$3,772	(\$112,540)	(\$27,412)	\$24,287	\$3,772	(\$112,540)

Does Not Meet Board's Financial Performance Expectations

* 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	Meets	--
1.b. Does the charter holder adhere with applicable education requirements defined in state and federal law?	Does Not Meet	Meets	Meets	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?	Does Not Meet	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	Does Not Meet	--
3. Is the charter holder complying with all other obligations?	Meets	Meets	Meets	Does Not Meet	--
OVERALL RATING	Meets Operational Standard	Meets Operational Standard	Meets Operational Standard	Does Not Meet Operational Standard	--
BOARD EXPECTATIONS	--	Meets Operational Expectations	Meets Operational Expectations	Does Not Meet Operational Expectations	Does Not Meet Operational Expectations

Last Updated: 2019-07-31 10:50:29



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	Meets	--
Educational Program - Essential Terms	No issue identified	No issue identified	No issue identified	No issue identified	--
1.b. Does the charter holder adhere with applicable education requirements defined in state and federal law?	Does Not Meet	Meets	Meets	Does Not Meet	--
Services to Student with Disabilities	No issue identified	No issue identified	No issue identified	Substantiated Complaint - ADE** ADE Monitoring CAP** (more info)	--
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)	ADE Monitoring CAP - Federal Title Funds (more info)	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* (more info)	--

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	Teacher Resumes (Site Visit)* (more info)	--
Open Meeting Law	No issue identified	No issue identified	No issue identified	Substantiated Complaint* (more info)	--
Board Alignment	No issue identified	No issue identified	No issue identified	Inconsistency in Reporting* (more info)	--
2.e. Is the charter holder complying with its obligations to the Board?	Does Not Meet	Meets	Meets	Does Not Meet	--
Timely Submissions	Financial Performance Response (more info)	No issue identified	No issue identified	Complaint Response* 7-day Requirement Failure to Submit* 30-day Requirement Failure to Submit* 30-day Requirement Failure to Submit-2* (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	Agreement to Restore Failing School* (more info)	--
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	Does Not Meet	--
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)	School Improvement Requirements* (more info)	--
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)	--
OVERALL RATING	Meets Operational Standard	Meets Operational Standard	Meets Operational Standard	Does Not Meet Operational Standard	--
BOARD EXPECTATIONS	--	Meets Operational Expectations	Meets Operational Expectations	Does Not Meet Operational Expectations	Does Not Meet Operational Expectations

Last Updated: 2019-07-31 10:50:29



Appendix B: Site Visit Report

Onsite Visit Final Report

CHARTER INFORMATION

Charter Holder Name	Lifelong Learning Research Institute, Inc.	School Name	Jack Thoman Air and Space Academy and Performing Arts Studio
Charter Holder Entity ID	90754	Site Visit Date	January 8, 2019
		Final Report Date	January 18, 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 January 8, 2019, Board staff conducted an unannounced site visit to Jack Thoman Air and Space Academy and Performing Arts Studio (“the School”). The unannounced site visit was prompted by information presented to the Board. During the site visit, Board staff met with 4th grade teacher, Ms. Andrea Joseph. The School’s site contact, Robert Klem, was not on site the day of the visit. Board staff communicated with the Charter Representative, Mary Lou Klem, via phone call during the visit.

School Background

School Name	Month/ Year Open	Location	ADM*	Grade Levels Served
Jack Thoman Air and Space Academy and Performing Arts Studio	August/2010	Sahuarita	25.56	K-8

*ADM as of 1/8/19/

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 issue(s) 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 **February 18, 2019**.

Lifelong Learning Research Institute, Inc. / Jack Thoman Air and Space Academy and Performing Arts Studio



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 **February 18, 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.

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.

Compliance Item	Findings	Required Submission
<p>Instructional Hours</p>	<p>Board staff requested instructional schedules during the site visit for the purpose of reviewing content and instructional hours pursuant to A.R.S. §15-901. School staff was unable to produce them onsite.</p> <p>Charter Representative, Mary Lou Klem, indicated on the phone call with Board staff that occurred during the visit that she would provide them to staff via email.</p> <p>January 9: A follow up email was sent to Ms. Klem by Board staff requesting a variety of documents, including the instructional schedules for each grade level being served at the school, to be submitted by January 11th.</p> <p>January 14: Board staff sent a second follow up email to Ms. Klem notifying her that she had not submitted the requested documents. Board staff had also attempted to call Ms. Klem, but there was no answer and the voicemail box was full.</p>	<p>Provide:</p> <ul style="list-style-type: none"> - Daily instructional schedules for each grade served by the School (grades Kindergarten through 8th grade).



Fingerprint Clearance Cards and Fingerprint Checks	<p>Fingerprint clearance cards (“FCCs”) and fingerprint checks were reviewed pursuant to A.R.S. §§15-183 (C) (5) and 15-512. At the site visit, no evidence of an FCC was provided for the Special Education teacher, Ms. Kates. Ms. Kates was not present at the School on the day of the site visit.</p> <p>Recorded in Measure 2.c: Fingerprinting</p>	<p>Provide:</p> <ul style="list-style-type: none"> - This issue is being addressed under a separate cover..
Instructional Staff Education and Experience	<p>Teaching background and experience information for the Special Education teacher, Ms. Kates was not available for viewing on the day of the site visit, pursuant to A.R.S. §15-183(F)</p> <p>Recorded in Measure 2.d.: Teacher Resumes</p>	<p>Provide:</p> <ul style="list-style-type: none"> - A copy of the teaching background and experience information for the Special Education teacher, Ms. Kates.
Enrollment Policies	<p>The following enrollment policies were reviewed and found NOT to be in compliance pursuant to Arizona Revised Statutes related to enrollment:</p> <p>Page 7 of the Student Handbook states, “Proof of immunizations is required before a child can be enrolled.”</p> <ul style="list-style-type: none"> - 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 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: <ol style="list-style-type: none"> 1. The parent or guardian of the pupil submits a signed 	<p>Provide:</p> <ul style="list-style-type: none"> - An updated copy of the Student Handbook demonstrating compliance with A.R.S. §15-872 E. - An updated copy of the enrollment packet demonstrating compliance with the associated statute.



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.

Page 1 of the enrollment packet asks, "Has your child ever been suspended or expelled from a previous school for any reason?"

- The statement is in conflict with A.R.S. § 15-184(I), which does not provide basis for denying enrollment due to suspension or past discipline records. "A charter school may refuse to admit any pupil who has been expelled from another educational institution or who is in the process of being expelled from another educational institution."

The PHLOTE form (home language survey) is missing from the enrollment/ registration forms. Pursuant to A.A.C. R7-2-306 (B), "The primary or home language of all students shall be identified by the students' parent or legal guardian on the enrollment form and the home language survey."

Furthermore, all three questions on the PHLOTE form must be asked



	<p>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.</p> <ul style="list-style-type: none"> - 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. 	
	<p>Recorded in Measure 2.b.: Enrollment Processes</p>	
<p>Program of Instruction</p>	<p>At the site visit, Ms. Joseph stated that the following instructional resources are used: Motivations, ALEKS, Galileo and Spalding Phonics. She also indicated that lesson plans are submitted weekly to Mrs. Klem and that Mrs. Klem conducts teacher evaluations three times per year, as well as walkthroughs</p> <p>January 9: A follow up email was sent to Ms. Klem by Board staff requesting lesson plans and teacher evaluations, to be submitted by January 11th.</p> <p>January 14: Board staff sent a second follow up email to Ms. Klem notifying her that she had not submitted the requested documents. Board staff had also attempted to call Ms. Klem, but there was no answer and the voicemail box was full.</p>	<p>Provide:</p> <ul style="list-style-type: none"> - Documentation of lesson plans for the week of January 7 for each grade level in the subject areas of ELA (Reading/Writing) and Math. The lesson plans and/or student objectives must demonstrate alignment to Arizona state standards. - Copies of completed teacher evaluations and walkthroughs conducted this school year 18-19 for your instructional staff.
<p>Academic Performance Notifications</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>Provide:</p> <ul style="list-style-type: none"> - An updated copy of the school calendar removing the statement indicated.



	<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, including AZ MERIT testing.</p> <p>Furthermore, per Arizona Administrative Code R7-5-602, charter schools with an “F” letter grade are required to accurately describe the charter school’s most current annual achievement profile assigned by the Department of Education.</p>	
<p>Changes to the Contract</p>	<p>Recorded in Measure 2.d.: Academic Performance Notifications</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 “Jack Thoman Air and Space Academy and Performing Arts Studio.”</p> <p>On the day of 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</p>	<p>Provide:</p> <ul style="list-style-type: none"> - Submission of an administratively complete school name change amendment request to properly update the charter contract.



	Holder is in violation of its contract.	
	Recorded in Measure 2.e.: Timely Submissions	
Board Alignment	Pursuant to A.R.S. §38-431.01-09, Corporate Board membership was found to not be consistent between ASBCS Online and the Arizona Corporate Commission (“ACC”). Ed Butchart is listed on ACC as a board member but is not listed on ASBCS Online.	Provide: <ul style="list-style-type: none"> - Submission of an administratively complete charter holder governance amendment request to properly align its board members through ASBCS Online. OR - Documentation demonstrating that the appropriate filing has been submitted with the ACC to align its board members.
	Recorded in Measure 2.d.: Board Alignment	



Appendix C: Communication Timeline (Entity ID: 90754)

January 8, 2019	Board staff conducted an unscheduled onsite visit to Jack Thoman Air and Space Academy and Performing Arts Studio in Sahuarita. Mary Lou Klem, the Charter Representative and school principal was not physically present on the day of the visit, but Board staff did speak with Mrs. Klem via a phone call. Board staff told Mrs. Klem that she would have an opportunity to submit the documents listed in a follow-up email.
January 9, 2019	As a follow-up to the site visit, Board staff emailed the Charter Representative with a list of documents still needed for review. The Charter Holder was given a deadline of January 11, 2019 to provide: instructional schedules, Student/Parent Handbook, attendance, enrollment, and discipline policies, lesson plans for the week of January 7, 2019, completed teacher evaluations and walkthroughs for the 2018 - 2019 school year.
January 14, 2019	Board staff called the Charter Representative to follow up on the January 9, 2019 email. Board staff did not receive an answer or returned call; the Charter Representative’s voicemail box was full, and Board staff was unable to leave a voicemail. Board staff emailed the Charter Representative notifying her that staff had not received any documentation in response to the January 9, 2019 email.
January 15, 2019	In an email to Board staff, the Charter Representative stated, “I will gather these today and send them to you. My computer hard drive crashed on Thursday and we are working to recover data from the machine. I do not anticipate any long delay.”
January 17, 2019	Robert Klem, a board member of the Charter Holder and school leader of Jack Thoman’s sister school, submitted the School’s Student/Parent handbook <ul style="list-style-type: none"> • January 18 - Board staff confirmed receipt of the handbook
January 18, 2019	Board staff emailed the Charter Representative notifying her of a fingerprinting requirement to provide proof of a valid FCC for the staff member which was not available for review at the time of the site visit. The deadline date was January 20, 2019 . In a second email, Board staff notified the Charter Representative 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 February 18, 2019 to submit the required documentation detailed in the report.
January 21, 2019	Mr. Klem submitted class schedules and lesson plans.



January 29, 2019	Board staff notified the Charter Holder of failure to submit the required FCC. <ul style="list-style-type: none"> Charter Representative responded that Mr. Klem had the FCC.
January 30, 2019	Mr. Klem submitted FCC and resume for missing staff member.
January 31, 2019	Mr. Klem submitted teacher evaluations. <ul style="list-style-type: none"> Board staff responded to confirm receipt of the evaluations.
February 6, 2019	Mr. Klem emailed to confirm staff received submissions. <ul style="list-style-type: none"> Staff responded confirming receipt of submissions.
February 7, 2019	Board staff emailed the report (originally sent on 1/18/2019) to Mr. Klem at the Charter Representative's request. Board staff confirmed that the FCC and resume were reviewed and in compliance.
February 14, 2019	Mr. Klem submitted a revised Student Handbook and Enrollment packet and PHLOTE form.
February 18, 2019	Mr. Klem emailed Board staff stating he left a voicemail and had questions about the final report. Mr. Klem submitted the FCC and resume for a newly hired teacher, school calendar, updated enrollment cover sheet and registration form.
March 6, 2019	Board staff notified the Charter Holder of its Failure to Submit F-School requirements to ADE by the original due date, November 1, 2018. The Charter Holder was given a deadline of March 16, 2019 to submit the documentation to ADE.
March 6, 2019	Board staff notified the Charter Holder of its 30-day Failure to Submit the required documentation from the report. 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 deadline of March 13, 2019 to submit the outstanding documentation.
March 12, 2019	Mr. Klem submitted class schedules and walkthroughs; he asked Board staff to resend the 30-day Failure to Submit letter.
March 13, 2019	Mr. Klem submitted governing body minutes for the January meeting, 3rd grade lesson plans, and documentation of corporate board updates.
March 14, 2019	Board staff sent the 30-day Failure to Submit notification to Mr. Klem at his request; the Charter Representative was carbon copied on the email, as well. The Charter Representative stated that she had not received the original notification. <ul style="list-style-type: none"> Board staff responded to the Charter Representative with a screenshot of the original 30- notification confirming that it was sent to her on March 6, 2019; the email included a reminder that the due date of March 13, 2019 had passed.
March 21, 2019	Board staff notified the Charter Holder that the School's website was out of compliance. The violation was recorded on the Charter Holder's operational dashboard The Charter Holder was given a deadline of April 22, 2019 to submit a screenshot or link to the website demonstrating compliance with A.R.S. § 15-189.05 (teacher salary posting).



April 9, 2019	After review of all submissions, Board staff issued a Site Visit Closeout notification to the Charter Holder based on issues identified at the onsite visit. This closeout did not include the issue related to the teacher salary posting. Board staff updated the Charter Holder's operational dashboard to reflect the closeout status.
June 3, 2019	Board staff notified the Charter Holder of its 30-day Failure to Submit the required submission to demonstrate compliance with A.R.S. § 15-189.05. The failure to submit was recorded on the Charter Holder's operational dashboard The Charter Holder was given a deadline of June 10, 2019 to submit the outstanding documentation.
June 10, 2019	Mr. Klem submitted a screenshot of the School's revised teacher salary posting in accordance with A.R.S. § 15-189.05. The operational dashboard was updated to reflect the correction on June 18, 2019 .
July 31, 2019	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.
August 1, 2019	Board staff called the Charter Representative at the representative's number and cell phone number. A message was left at the representative number and no message was left at the cell phone number because the voicemail box was full.
August 6, 2019	Board staff called the Charter Holder's attorney, Deanna Radar and left a voicemail. The Charter Representative or attorney have not called back.





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March 6, 2019

Lifelong Learning Research Institute, Inc.
Mary Lou Klem, Charter Representative
PO Box 36045
Tucson, AZ 85740

Sent via email: marylou@lifelonglearningacademy.com

RE: 30 Day Failure to Submit – Lifelong Learning Research Institute, Inc. – Entity ID 90754

Dear Charter Representative,

On January 18, 2019, Lifelong Learning Research Institute, Inc. ("Charter Holder") was notified of its 30-day follow-up requirement as part of an onsite visit conducted January 8, 2019. The Charter Holder did not submit all of the required information on or before the due date of February 18, 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 **March 13, 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 **March 13, 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.

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.

Compliance Item	Findings	Required Submission
Instructional Hours	<p>Initial submission requirement:</p> <p>Daily instructional schedules for each grade served by the School (grades Kindergarten through 8th grade).The submission was deemed insufficient due to the following:</p> <ul style="list-style-type: none"> The instructional schedules for 2nd, 3rd, 5th, 6th, and 7th grades were missing. 	<p>Current submission requirement:</p> <ul style="list-style-type: none"> Daily instructional schedules for the following grades <ul style="list-style-type: none"> 2nd 3rd 5th 6th 7th
Enrollment Policies	<p>Initial submission requirement:</p> <ul style="list-style-type: none"> Revised enrollment documents Revised student/parent handbook <p>The submission was deemed insufficient due to the following:</p> <ul style="list-style-type: none"> The registration form is missing the three home language survey questions 	<p>Current submission requirement:</p> <ul style="list-style-type: none"> An updated registration form which includes all three questions from the PHLOTE form 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.
Program of Instruction	<p>Initial submission requirement:</p> <ul style="list-style-type: none"> Documentation of lesson plans for the week of January 7 for each grade level in the subject areas of ELA (Reading/Writing) and Math. The lesson plans and/or student objectives must demonstrate alignment to Arizona state standards. Copies of completed teacher evaluations and walkthroughs conducted this school year 18-19 for your instructional staff. <p>Lesson plans were submitted for grades K-1 and 4 through 7. Upon review of the submitted lesson plans, Board staff identified the following common deficiencies:</p> <ul style="list-style-type: none"> Missing lesson plans for grades 2 – 3 Missing state standards for core content subjects (e.g. Math) Multiple grade-level state standards within one grade-level lesson plan State standard listed does not clearly 	<p>Current submission requirement:</p> <ul style="list-style-type: none"> Lesson plans for grades 2 and 3 to include the subject areas of ELA (Reading/Writing) and Math. Each lesson plan and/or student objectives must demonstrate alignment to state standards. Each state standard should specify the grade level, strand, cluster and standard. Documentation of informal classroom visits conducted this school year (2018-2019) for each classroom teacher

	<p>identify the grade-level strand, cluster and sub standard</p> <p>Teacher evaluations submitted by the Charter Holder demonstrate evaluations for the 2017-2018 school year. According to those observations, informal classroom visits are conducted mid-year.</p>	
<p>Board Alignment</p>	<p>Initial submission requirement:</p> <ul style="list-style-type: none"> • Submission of an administratively complete charter holder governance amendment request to properly align its board members through ASBCS Online. OR • Documentation demonstrating that the appropriate filing has been submitted with the ACC to align its board members. <p>The Charter Holder has verified that Ed Butchart is a corporate board member and is listed on ACC. Instructions on how to add him to the corporate board was requested via email on February 18, 2019.</p> <p>The submission was deemed insufficient due to not submitting an administratively complete charter holder governance amendment request.</p>	<p>Current submission requirement:</p> <ul style="list-style-type: none"> • Submission of an administratively complete charter holder governance amendment request to properly align its board members through ASBCS Online. Instructions for this amendment are found at this link: https://asbcs.az.gov/school-resources/amendment-notification



Arizona State Board for Charter Schools

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June 3, 2019

Lifelong Learning Research Institute, Inc.
Mary Lou Klem, Charter Representative
PO Box 36045
Tucson, AZ 85740

Sent via email: marylou@lifelonglearningacademy.com

RE: 30 Day Failure to Submit – Lifelong Learning Research Institute, Inc. – Entity ID 90754

Dear Charter Representative,

On March 21, 2019, Lifelong Learning Research Institute, Inc. (“Charter Holder”) was notified of its 30-day follow-up requirement to come into compliance with A.R.S. §15-189.05. The Charter Holder did **not** submit the required information on or before the due date of April 22, 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. Currently, the Charter Holder is out of compliance with A.R.S. §15-189.05 due to the following:

- The required posting per A.R.S. §15-189.05 was not submitted by the required deadline.
- The teacher salary posting that is currently on the website 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.
- Additionally, the posting does not clearly delineate the average teacher salary for Jack Thoman Air and Space Academy separate from the sister school, Lifelong Learning Academy. Each school is required to have its own information posted.
-

Therefore, as a final opportunity, by June 10, 2019, the Charter Holder must address these noncompliance issues by providing:

- A screenshot of or link to the updated website home page with the required teacher salary posting for Jack Thoman Air and Space Academy, including the following information per A.R.S. § 15-189.05
 - The average salary of all teachers employed by the charter school for the current year.
 - The average salary of all teachers employed by the charter school for the previous year.
 - The dollar increase in the average salary of all teachers employed by the charter school for the current year.
 - The percentage increase in the average salary of all teachers employed by the charter school for the current year.

Failure to resolve/address the issue(s), as described above, by **June 10, 2019** may result in the Charter Holder being placed on a subsequent Board meeting agenda for possible disciplinary action pursuant to A.A.C. R7-5-505(G).

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. To request an extension, please email the Charter Holder's rationale for the extension to charterschoolboard@asbcs.az.gov. At that time, the request for extension will be considered by the Executive Director for approval or denial.

The Charter Holder is currently out of compliance with the terms of its contract until the issues identified are addressed. Any other requests submitted to the Board will be rejected and closed until the above noncompliance issues have been addressed.

Sincerely,

Serena Campas
Special Projects & Program Manager
Arizona State Board for Charter Schools