International Commerce Secondary Schools, Inc. - Entity ID 4334

School: International Commerce High School - Phoenix (88232) and
Humanities and Sciences High School - Phoenix (5506)

Issue

International Commerce High School - Phoenix, a school operated by International Commerce Secondary Schools, Inc., was assigned an F letter grade by the Arizona Department of Education based on its academic performance during the 2013-2014 school year. The Board must determine whether to restore the charter to acceptable performance or to revoke the charter.

Background Information

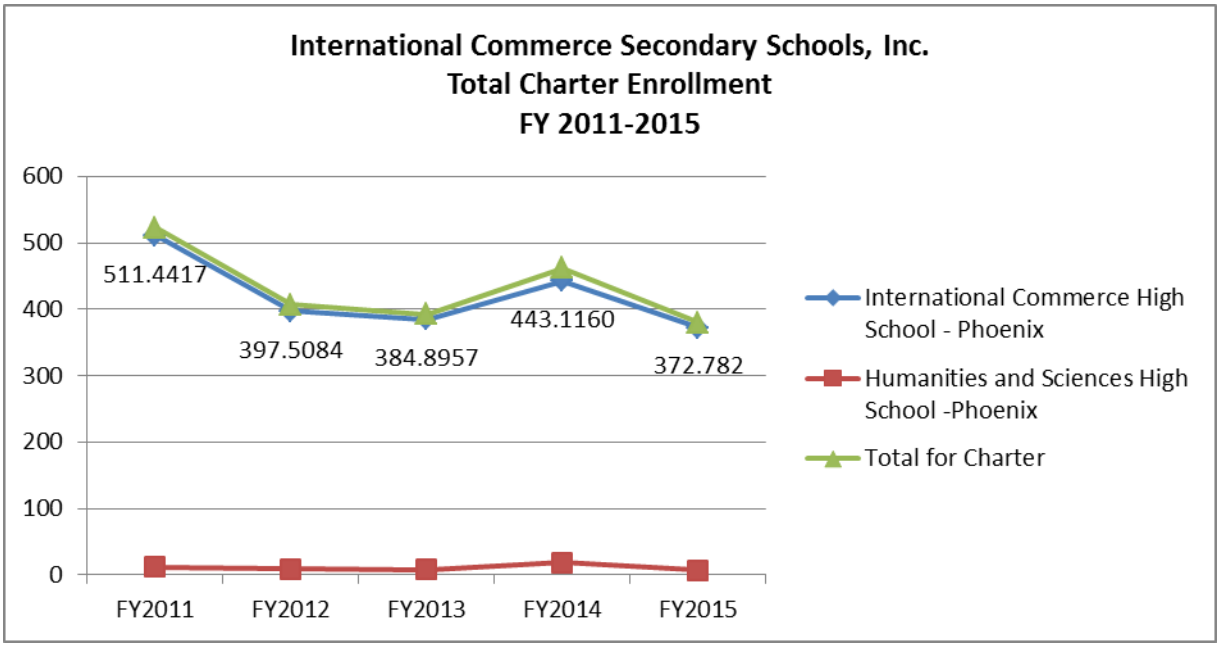
In FY2012, International Commerce High School - Phoenix received an Overall Rating of 42.86 (Does Not Meet) and a letter grade of D. In FY2013, the school received an Overall Rating of 46.25 (Does Not Meet) and a letter grade of D-ALT. In FY2014, the school received an Overall Rating of 46.25 (Does Not Meet) and a letter grade of F.

On October 2, 2014, the Arizona Department of Education (ADE) notified the Board of the F letter grade status (failing level of performance) of International Commerce High School - Phoenix (portfolio: b. Notifications, i**.** Notification of Charters with F Letter Grade for the 2014-2015 SY). Pursuant to A.R.S. § 15-241(U), if a charter school is assigned a letter grade of F, the ADE shall immediately notify the charter school's sponsor. The charter school's sponsor shall either take action to restore the charter school to acceptable performance or revoke the charter school's charter.

I. Profile

International Commerce Secondary Schools, Inc. currently has 2 school sites open under this charter. International Commerce High School - Phoenix and Humanities and Sciences High School - Phoenix both serve students in grades 9 – 12 in Phoenix.

The graph below shows average daily membership (ADM) for the charter based on 100th day ADM for fiscal years 2011-2014 and 40th day ADM for fiscal year 2015, as well as for each school site.

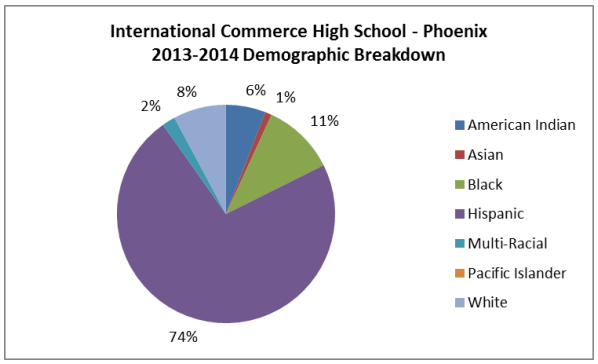


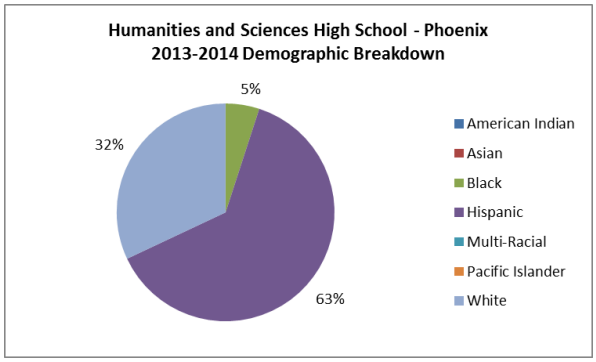
The academic performance of all schools operated by International Commerce Secondary Schools, Inc. is represented in the table below. Academic dashboards for each school can be seen in the portfolio: f. Academic Dashboards, i. Academic Dashboard – International Commerce High School - Phoenix and ii. Academic Dashboard – Humanities and Sciences High School - Phoenix.

School Name	Opened	Current Grades Served	2012 Overall Rating	2013 Overall Rating	2014 Overall Rating
International Commerce High School - Phoenix	7/01/2007	9 – 12	42.86 / D	46.25 / D-ALT	46.25 / F
Humanities and Sciences High School - Phoenix	10/12/2010	9 – 12	NR/ NR	NR/ NR	NR/ NR

The Charter Holder's website indicates that the mission of International Commerce High School - Phoenix is to prepare adult high school students, ages 16 to 21, academically for occupational education, postsecondary education, social responsibility, employability, and lifelong learning. Specifically, the website indicates the school provides Adult Basic Education, Adult Secondary Education, Literacy, and English Language Acquisition for Adults. According to data provided by the ADE, 56% of students tested in FY14 were 12th graders, and approximately 20% of students tested were at least 19 years old at the start of the school year.

The demographic data for International Commerce High School - Phoenix and Humanities and Sciences High School - Phoenix from the 2013-2014 school year is represented in the charts below.[1]





The percentage of students who were eligible for Free and Reduced Lunch, classified as English Language Learners, and classified as students with disabilities in the 2013-2014 school year is represented in the table below.[2]

Category	International Commerce High School - Phoenix	Humanities and Sciences High School - Phoenix
Free and Reduced Lunch (FRL)	*	*
English Language Learners (ELLs)	8%	*
Special Education	3%	*

[1] Information provided by the Research and Evaluation Division of the ADE

[2] Information provided by the Research and Evaluation Division of the ADE. If the percentage of students in a non-ethnicity-based demographic group is 0% or 100%, the percentage for that demographic group was redacted.

II. Additional School Choices

International Commerce High School - Phoenix is located in Phoenix near 7th Street and Camelback Road. The following information identifies additional schools within a 5 mile radius of the school and the academic performance of those schools.

There are 15 alternative high schools within a 5 mile radius of International Commerce. The table below provides a breakdown of those schools. Schools are grouped by the A - F letter grade assigned by the ADE. For each letter grade, the table identifies the number of schools assigned that letter grade, the number of those schools that are charter schools, the number of the charter schools that are meeting the Board's academic performance standard for FY14, and the number of schools serving a comparable percentage of students (± 5%) in the identified subgroups.[3]

Letter Grade	Within 5 miles	Charter Schools	Meets Board's Standard	Comparable FRL	Comparable ELL	Comparable SPED
B-ALT	4	3	3	*	3	1
C-ALT	8	8	4	*	3	6
D-ALT	2	2	0	*	2	1
F	1	0	N/A	*	1	0

III. Timeline of Activities

The following is a timeline of activities that have occurred related to the academic performance of International Commerce Secondary Schools, Inc.:

November 2010 International Commerce Secondary Schools, Inc. was notified that the Charter Holder was waived from the requirements of the Academic Performance Section of the renewal application and was waived from further review until its next five-year interval review which would occur in FY2016.

April 11, 2011 The Board approved the request for charter renewal and unanimously granted a renewal contract to International Commerce Secondary Schools, Inc. as part of the Consent Agenda. (Prior Board consideration materials and recording. Prior Board consideration summary and decision.)

October 15, 2014 In response to the October 2, 2014 notification by the ADE of the F letter grade status and in accordance with the Board's processes, the Charter Holder was notified in an email of its requirement to submit a Demonstration of Sufficient Progress (DSP) and Financial Performance Response as a requirement for a failing school that does not meet the Board's academic performance expectations (portfolio: b. Notifications, ii. F School Notification – Action Required). The Charter Holder was informed that the determination by the Board of whether to restore or to revoke the charter for International Commerce Secondary Schools, Inc. would be based on the evidence of the Charter Holder's performance in accordance with the performance framework adopted by the Board, including the Charter Holder's demonstration of

[3] Evaluation completed using information provided by the Research and Evaluation Division of the ADE. No evaluation completed for the FRL subgroup because the percentage for that demographic group was redacted either because the percentage of students in the non-ethnicity-based demographic group is 0% or 100%.

sufficient progress toward the Academic Performance Expectations of the Board.

November 14, 2014 The Charter Holder timely submitted a DSP Report (portfolio: g. Demonstration of Sufficient Progress Report) and Financial Performance Response to the Board.

Board staff sent an email to the charter representative (portfolio: b. Notifications, iii. F School DSP Site Visit Notification) which provided information about the site visit date and how to prepare for the site visit.

November 20, 2014 Board staff sent an email to the charter representative (portfolio: b. Notifications, iv. Failing School DSP Report Initial Evaluation and Site Visit) which confirmed the site visit date and provided a copy of the initial evaluation of the DSP Report that identified areas initially evaluated as not acceptable must be addressed with additional evidence and documentation at the time of the visit.

December 12, 2014 Board staff conducted the site visit to confirm the documentation presented in the DSP Report and review additional information to be considered in the final evaluation of the Charter Holder's DSP submission.

IV. Demonstration of Sufficient Progress

The following representatives of International Commerce Secondary Schools, Inc. were present at the site visit:

Name	Role
Michael Curd	Superintendent
David Curd	Charter Representative
Sue Durkin	Principal
Anita Cohen	Administrator

Board staff completed a document inventory for all evidence presented by the Charter Holder (portfolio: c. Inventory Documents) during the site visit. The Charter Holder was provided a copy of the document inventory at the end of the site visit. Following the site visit, Board staff completed a final evaluation of the DSP (portfolio: d. DSP Final Evaluation). The following is a summary of the final DSP Evaluation:

Evaluation Summary			
Area	DSP Evaluation		
	Meets	Does Not Meet	Falls Far Below
Data	☒	☐	☐
Curriculum	☒	☐	☐
Assessment	☒	☐	☐
Monitoring Instruction	☒	☐	☐
Professional Development	☒	☐	☐
Graduation Rate	☒	☐	☐

After considering information in the DSP Report and evidence provided at the time of the site visit, the Charter Holder demonstrated evidence of a sustained improvement plan that includes implementation of a comprehensive curriculum system, a comprehensive assessment system, a comprehensive instructional monitoring system, a comprehensive professional development system, a system for ensuring students in grades 9-12 graduate, and a system for keeping students motivated and engaged in

school. Data and analysis provided at the site visit demonstrates comparative improvement year-over-year for at least the two most recent school years based on data generated from valid and reliable assessment sources.

Based on the findings summarized above and described below, staff determined that the Charter Holder demonstrated sufficient progress towards meeting the Board's Academic Performance Expectations.

Data

The area of Data is evaluated as Meets. As evidenced at the site visit, the Charter Holder has, for each required measure, provided data and analysis generated from valid and reliable assessment sources that demonstrates comparative improvement year-over-year for at least the two most recent school years (portfolio: c. Inventory Documents, i. Site Visit Inventory – Data – International Commerce High School – Phoenix and ii. Site Visit Inventory – Data – Humanities and Sciences High School – Phoenix).

Curriculum

The area of Curriculum is evaluated as Meets. As demonstrated by the evidence provided at the DSP site visit, the Charter Holder has consistently implemented a comprehensive curriculum system that addresses each of the required elements. For more detailed analysis, see Curriculum Inventory (portfolio: c. Inventory Documents, iii. Site Visit Inventory – Curriculum).

Question	Sufficient Evidence	Document Inventory Item
Evaluating Curriculum		
What is the Charter Holder's process for evaluating curriculum? How does the Charter Holder evaluate how effectively the curriculum enables students to meet the standards?	Yes	C1
How does the Charter Holder identify gaps in the curriculum?	Yes	C2
Adopting/Revising Curriculum		
What is the Charter Holder's process for adopting or revising curriculum based on its evaluation processes?"	Yes	C3
Who is involved in the process for adopting or revising curriculum?"	Yes	C4
When adopting curriculum, how does the Charter Holder evaluate curriculum options to determine which curriculum to adopt?	Yes	C5
Implementing Curriculum		
What is the Charter Holder's process for ensuring consistent implementation of the curriculum across the school(s) operated by the Charter Holder?	Yes	C6
What tools exist that identify what must be taught and when it must be delivered? How does the Charter Holder ensure that all grade-level standards are covered within the academic year?	Yes	C7
What is the expectation for consistent use of these tools? How are these expectations communicated?	Yes	C8
What evidence is there to demonstrate usage of these tools in the classroom and alignment with instruction?	Yes	C9
Alignment of Curriculum		
How does the Charter Holder know the curriculum is aligned to standards?	Yes	C10

Adapted to Meet the Needs of Subgroups		
How has the Charter Holder ensured that the curriculum addresses the needs of students with proficiency in the bottom 25%/non-proficient students?	Yes	C11
How has the Charter Holder ensured that the curriculum addresses the needs of English Language Learners (ELLs)?	Yes	C12
How has the Charter Holder ensured that the curriculum addresses the needs of Free and Reduced Lunch (FRL) students?	N/A	C13
How has the Charter Holder ensured that the curriculum addresses the needs of students with disabilities?"	Yes	C14

Assessment

The area of Assessment is evaluated as Meets. As demonstrated by the evidence provided at the DSP site visit, the Charter Holder has consistently implemented a comprehensive assessment system that addresses each of the required elements. For more detailed analysis, see Assessment Inventory (portfolio: c. Inventory Documents, iv. Site Visit Inventory – Assessment).

Question	Sufficient Evidence	Document Inventory Item
Assessment System		
What types of assessments does the Charter Holder use?	Yes	A1
What was the process for designing or selecting the assessment system?	Yes	A2
How is the assessment system aligned to the curriculum and instructional methodology?	Yes	A3
What intervals are used to assess student progress? How does the assessment plan include data collection from multiple assessments, such as formative and summative assessments and common/benchmark assessments?	Yes	A4
Analyzing Assessment Data		
How does the assessment system provide for analysis of assessment data? What intervals are used to analyze assessment data?	Yes	A5
How is the analysis used to evaluate instructional and curricular effectiveness?	Yes	A6
How is the analysis used to adjust curriculum and instruction in a timely manner? What intervals are used to adjust curriculum and instruction?	Yes	A7
Adapted to Meet the Needs of Subgroups		
How is the assessment system adapted to meet the assessment needs of students with proficiency in the bottom 25%/non-proficient students?	Yes	A8
How is the assessment system adapted to meet the assessment needs of English Language Learners (ELLs)?	Yes	A9
How is the assessment system adapted to meet the assessment needs of Free and Reduced Lunch (FRL) students?	N/A	A10
How is the assessment system adapted to meet the assessment needs of students with disabilities?	Yes	A11

Monitoring Instruction

The area of Monitoring Instruction is evaluated as Meets. As demonstrated by the evidence provided at the DSP site visit, the Charter Holder has consistently implemented a comprehensive instructional monitoring system that addresses each of the following required elements. For more detailed analysis, see Monitoring Instruction Inventory (portfolio: c. Inventory Documents, v. Site Visit Inventory Monitoring Instruction).

Question	Sufficient Evidence	Document Inventory Item
Monitoring the Integration of Standards		
What is the Charter Holder's process for monitoring the integration of standards into classroom instruction? How does the Charter Holder monitor whether or not instructional staff implements an ACCRS-aligned curriculum with fidelity?	Yes	M1
How does the Charter Holder monitor the effectiveness of standards-based instruction throughout the year?	Yes	M2
Evaluating Instructional Practices		
What is the Charter Holder's process for evaluating the instructional practices? How does this process evaluate the quality of instruction?	Yes	M3
How does this process identify individual strengths, weaknesses, and needs?	Yes	M4
Providing Analysis and Feedback to Further Develop Instructional Quality		
How does the Charter Holder provide feedback on strengths, weaknesses, and learning needs based on the evaluation of instructional practices?	Yes	M5
How does this Charter Holder analyze this information? What does the data about quality of instruction tell the Charter Holder? What has the Charter Holder done in response?	Yes	M6
Adapted to Meet the Needs of Subgroups		
How does the Charter Holder monitor instruction to ensure it is meeting the needs of students with proficiency in the bottom 25%/non-proficient students?	Yes	M7
How does the Charter Holder monitor instruction to ensure it is meeting the needs of English Language Learners (ELLs)?	Yes	M8
How does the Charter Holder monitor instruction to ensure it is meeting the needs of Free and Reduced Lunch (FRL) students?	N/A	M9
How does the Charter Holder monitor instruction to ensure it is meeting the needs of students with disabilities?	Yes	M10

Professional Development

The area of Professional Development is evaluated as Meets. As demonstrated by the evidence provided at the DSP site visit, the Charter Holder has consistently implemented a comprehensive professional development system that addresses each of the following required elements. For more detailed analysis, see Professional Development Inventory (portfolio: c. Inventory Documents, vi. Site Visit Inventory – Professional Development).

Question	Sufficient Evidence	Document Inventory Item
Professional Development System		
What is the Charter Holder's professional development plan?	Yes	P1
How was the professional development plan developed?	Yes	P2
How is the professional development plan aligned with instructional staff learning needs?	Yes	P3
How does this plan address areas of high importance?	Yes	P4
Supporting High Quality Implementation		
How does the Charter Holder support high quality implementation of the strategies learned in professional development sessions?	Yes	P5
How does the Charter Holder provide the resources that are necessary for high quality implementation?	Yes	P6
Monitoring Implementation		
How does the Charter Holder monitor the implementation of the strategies learned in professional development sessions?	Yes	P7
How does the Charter Holder monitor and follow-up with instructional staff to support and develop implementation of the strategies learned in professional development?	Yes	P8
Adapted to Meet the Needs of Subgroups		
How does the professional development plan ensure that instructional staff receives the type of development required to meet the needs of students with proficiency in the bottom 25%/non-proficient students?	Yes	P9
How does the professional development plan ensure that instructional staff receives the type of development required to meet the needs of English Language Learners (ELLs)?	Yes	P10
How does the professional development plan ensure that instructional staff receives the type of development required to meet the needs of Free and Reduced Lunch (FRL) students?	N/A	P11
How does the professional development plan ensure that instructional staff receives the type of development required to meet the needs of students with disabilities?	Yes	P12

Graduation Rate

The area of Graduation Rate is evaluated as Meets. As demonstrated by the evidence provided at the DSP site visit, the Charter Holder has consistently implemented a system for ensuring students in grades 9-12 graduate that addresses each of the required elements. For more detailed analysis, see Graduation Rate Inventory (portfolio: c. Inventory Documents, vii. Site Visit Inventory – Graduation Rate).

Question	Sufficient Evidence	Document Inventory Item
Ensuring Students in Grades 9-12 Graduate		
How does the Charter Holder monitor and follow up on student progress toward completing courses to meet graduation requirements?	Yes	G1
How does the Charter Holder identify students that are not successfully progressing through required courses?	Yes	G2
How does the Charter Holder provide additional academic supports to remediate academic problems for struggling students?	Yes	G3
What data can the Charter Holder provide to demonstrate that these strategies are effective?	Yes	G4

Academic Persistence

The area of Academic Persistence is evaluated as Meets. As demonstrated by the evidence provided at the DSP site visit, the Charter Holder has consistently implemented a system for keeping students motivated and engaged in school that addresses each of the required elements. For more detailed analysis, see Academic Persistence Inventory (portfolio: c. Inventory Documents, viii. Site Visit Inventory – Academic Persistence).

Question	Sufficient Evidence	Document Inventory Item
System for Keeping Students Motivated and Engaged in School		
How does the Charter Holder identify students who are at risk of dropping out or failing?	Yes	P1
What strategies does the Charter Holder utilize to address student challenges to completing/continuing their education?	Yes	P2
How does the Charter Holder evaluate these strategies to determine effectiveness?	Yes	P3

V. Viability of the Organization

The Charter Holder submitted consolidated financial statements, which included financial information for three entities. In accordance with the Board's performance framework, if the Charter Holder, the consolidated entity, or both do not meet the Board's financial performance expectations, then a financial performance response must be submitted. Based on the fiscal years 2013 and 2014 audits, the Charter Holder meets the Board's financial performance expectations, but the consolidated entity did not meet the Board's financial performance expectations. Therefore, a financial performance response

was required (portfolio: h. Financial Response).[4] The following table includes the consolidated entity's financial data and financial performance for the last three audited fiscal years.

Financial Data - Consolidated Entity				
Statement of Financial Position	**2014**	**2013**	**2012**	**2011**
Cash	$364,021	$323,758	$393,546	$423,879
Unrestricted Cash	$262,956	$223,958	$363,736	
Other Liquidity	$100,348	$100,209		
Total Assets	$1,197,970	$1,319,274	$1,212,824	
Total Liabilities	$1,014,212	$870,005	$825,981	
Current Portion of Long-Term Debt & Capital Leases	$124,790	$240,551	$231,114	
Net Assets	$183,758	$449,269	$386,843	
Statement of Activities	**2014**	**2013**	**2012**	
Revenue	$4,541,190	$4,566,916	$4,150,026	
Expenses	$4,449,378	$4,479,846	$4,309,765	
Net Income	$91,812	$87,070	($159,739)	
Change in Net Assets	$91,812	$87,070	($159,739)	
Financial Statements or Notes	**2014**	**2013**	**2012**	
Depreciation & Amortization Expense	$67,709	$56,302	$47,784	
Interest Expense	$14,398	$14,515	$16,243	
Lease Expense	$926,566	$928,674	$927,373	
Financial Performance - Consolidated Entity				
	2014	**2013**	**2012**	**3-yr Cumulative**
Near-Term Indicators				
Going Concern	No	No	No	N/A
Unrestricted Days Liquidity*	29.80	26.41	30.81	N/A
Default	No	No	No	N/A
Sustainability Indicators				
Net Income	$91,812	$87,070	($159,739)	N/A
Cash Flow	$40,263	($69,788)	($30,333)	($59,858)
Fixed Charge Coverage Ratio	1.03	0.92	0.71	N/A

* For fiscal year 2012, the field reflects the charter holder's performance under the financial framework's previous "Unrestricted Days Cash" measure.

Staff's evaluation of the financial performance response resulted in no "Acceptable" and three "Not Acceptable" determinations (portfolio: e. Financial Response Evaluation).[5]

[4] The submitted financial performance response addresses both the Charter Holder and the consolidated entity because the Charter Holder was mistakenly asked to submit a response along with the consolidated entity.

[5] Only the consolidated entity's financial performance response was evaluated (see previous footnote).

VI. Adherence to the Terms of the Charter

Does the delivery of the education program and operation reflect the essential terms of the educational program as described in the charter contract?
Yes. Based on the available information in the current fiscal year, the Charter Holder's education program, in operation, reflects the essential terms as described in the charter contract.

Does the Charter Holder adhere with applicable education requirements defined in state and federal law?
Yes. Based on the available information in the current fiscal year, the Charter Holder adheres with applicable education requirements defined in state and federal law.

Do the Charter Holder's annual audit reporting packages reflect sound operations?
Yes. As reported in the current fiscal year, the Charter Holder complies with applicable laws, rules, regulations and provisions of the charter contract relating to the fiscal year 2014 annual audit reporting package.

Is the Charter Holder administering student admission and attendance appropriately?
Yes. Based on the available information in the current fiscal year, the Charter Holder complies with applicable laws, rules, regulations and provisions of the charter contract relating to administering student admission and attendance.

Is the Charter Holder maintaining a safe environment consistent with state and local requirements?
Yes. Based on the available information in the current fiscal year, the Charter Holder complies with applicable laws, rules, regulations and provisions of the charter contract relating to maintaining a safe environment.

Is the Charter Holder transparent in its operations?
Yes. Based on the available information in the current fiscal year, the Charter Holder complies with applicable laws, rules, regulations and provisions of the charter contract relating to transparency of operations.

Is the Charter Holder complying with its obligations to the Board?
Yes. Based on the available information in the current fiscal year, the Charter Holder complies with applicable laws, rules, regulations and provisions of the charter contract relating to its obligations to the Board.

Is the Charter Holder complying with reporting requirements of other entities to which the Charter Holder is accountable?
Yes. Based on the available information in the current fiscal year, the Charter Holder complies with applicable laws, rules, regulations and provisions of the charter contract relating to operational requirements monitored by other entities to which the Charter Holder is accountable.

Is the Charter Holder complying with all other obligations?
Yes. Based on the available information in the current fiscal year, the Charter Holder complies with applicable laws, rules, regulations and provisions of the charter contract relating to all other obligations.

VII. Board Options

Option 1: The Board may determine that there is a basis to restore the charter without any conditions. Staff recommends the following language provided for consideration: Having considered the statements of the representatives of the Charter Holder today and the academic performance, the fiscal compliance, and legal and contractual compliance of the Charter Holder, I move that the Board restore

the charter to acceptable performance in accordance with A.R.S. § 15-241(U). In this case, International Commerce High School - Phoenix was designated as an F school for FY 2014, but International Commerce Secondary Schools, Inc. was able to demonstrate sufficient progress toward the Board's expectations when it provided evidence that it has consistently implemented a sustained improvement plan that includes a comprehensive curriculum system, comprehensive assessment system, comprehensive instructional monitoring system, comprehensive professional development system, a system for ensuring students in grades 9-12 graduate, and a system for keeping students motivated and engaged in school and was able to provide data and analysis to demonstrate the effectiveness of these systems in improving academic performance for International Commerce High School - Phoenix and Humanities and Sciences High School - Phoenix. Additionally, the Board has adopted an academic performance framework that allows for additional consideration of the Charter Holder throughout the contract period.

Option 2: The Board may determine that there is a basis to restore the charter through a Consent Agreement. The following language is provided for consideration: Having considered the statements of the representatives of the Charter Holder today and the academic performance, the fiscal compliance, and legal and contractual compliance of the Charter Holder, I move that the Board restore the charter to acceptable performance in accordance with A.R.S. § 15-241(U). In this case, International Commerce High School - Phoenix was designated as an F school for FY 2014, but International Commerce Secondary Schools, Inc. was able to demonstrate sufficient progress toward the Board's expectations when it provided evidence that it has consistently implemented a sustained improvement plan that includes a comprehensive curriculum system, comprehensive assessment system, comprehensive instructional monitoring system, comprehensive professional development system, a system for ensuring students in grades 9-12 graduate, and a system for keeping students motivated and engaged in school and was able to provide data and analysis to demonstrate the effectiveness of these systems in improving academic performance for International Commerce High School - Phoenix and Humanities and Sciences High School - Phoenix. Therefore, the Board directs staff to work with International Commerce Secondary Schools, Inc. to create a Consent Agreement for the purpose of restoring the charter to acceptable performance in accordance with A.R.S. § 15-241(U) if the Charter Holder agrees that 1) it will provide valid and reliable internal benchmarking mid-year and end-of-year data for FY15 that demonstrates continued improved academic performance as compared to FY13 and FY14 for International Commerce High School - Phoenix; 2) if it cannot provide valid and reliable internal benchmarking mid-year and end-of-year data for FY15 that demonstrates continued improved academic performance as compared to FY13 and FY14 for International Commerce High School - Phoenix the Charter Holder will close International Commerce High School - Phoenix at the end of FY15; 3) if International Commerce High School - Phoenix can provide valid and reliable internal benchmarking mid-year and end-of-year data for FY15 that demonstrates continued improved academic performance as compared to FY13 and FY14 for International Commerce High School - Phoenix and continues operating after the end of FY15 the Charter Holder will, until a new Academic Dashboard is released, provide quarterly reports with supporting evidence to demonstrate continued implementation of the comprehensive curriculum system, comprehensive assessment system, comprehensive instructional monitoring system, comprehensive professional development system, system for ensuring students in grades 9-12 graduate, and system for keeping students motivated and engaged in school; and provide valid and reliable internal benchmarking baseline, mid-year and end-of-year data that demonstrates continued improving academic performance and if it cannot do so the Charter Holder will close International Commerce High School - Phoenix no later than the end of the fiscal year; and 4) if the next Academic Dashboard that is

released does not demonstrate improved academic performance as compared to FY13 and FY14 for International Commerce High School - Phoenix the Charter Holder will close International Commerce High School - Phoenix no later than the end of the fiscal year during which the Academic Dashboard is released.

I further move that if the terms of a Consent Agreement cannot be reached by the February 1, 2015 the Board issue a Notice of Intent to Revoke the charter for the reasons previously stated and that:

- Within 48 hours of receipt of the Notice the charter operator shall notify staff and parents/guardians of registered students of the Notice of Intent to Revoke and the Notice of Hearing and provide a school location where the copy may be reviewed;
- Within 20 days of receipt of the Notice the charter operator shall provide copies of all correspondence and communications used to comply with the preceding provision; and
- Within 20 days of receipt of the Notice the charter operator shall provide the Board with the names and mailing addresses of parents/guardians of all students registered with the school.

Option 3: The Board may vote to issue a Notice of Intent to Revoke the Charter Holder's charter contract unless the Charter Holder submits a school closure notification for the school that has been designated an F School which would restore the charter to acceptable performance. The following language is provided for consideration: Having considered the statements of the representatives of the Charter Holder today and the academic performance, the fiscal compliance, and legal and contractual compliance of the Charter Holder, I move that the Board issue a Notice of Intent to Revoke the charter of International Commerce Secondary Schools, Inc. on the basis of International Commerce High School - Phoenix's designation as an F school for FY 2014.

All that taken into consideration, the Charter Holder currently operates one other school, Humanities and Sciences High School - Phoenix. Therefore, I further move that if, by February 1, 2015, International Commerce Secondary Schools, Inc. submits a school closure notification for International Commerce High School - Phoenix to close at the end of FY15, the Board shall not issue a Notice of Intent to Revoke the charter of International Commerce Secondary Schools, Inc.

I further move that if the school closure notification is not submitted by February 1, 2015 the Board issue a Notice of Intent to Revoke the charter for the reasons previously stated and that:

- Within 48 hours of receipt of the Notice the charter operator shall notify staff and parents/guardians of registered students of the Notice of Intent to Revoke and the Notice of Hearing and provide a school location where the copy may be reviewed;
- Within 20 days of receipt of the Notice the charter operator shall provide copies of all correspondence and communications used to comply with the preceding provision; and
- Within 20 days of receipt of the Notice the charter operator shall provide the Board with the names and mailing addresses of parents/guardians of all students registered with the school.

Option 4: The Board may vote to issue a Notice of Intent to Revoke the Charter Holder's charter contract. The following language is provided for consideration: Having considered the statements of the representatives of the Charter Holder today and the academic performance, the fiscal compliance, and legal and contractual compliance of the Charter Holder, I move that the Board issue a Notice of Intent to Revoke the charter of International Commerce Secondary Schools, Inc. on the basis of International Commerce High School - Phoenix's designation as an F school for FY 2014.

I further move that:

- Within 48 hours of receipt of the Notice the charter operator shall notify staff and parents/guardians of registered students of the Notice of Intent to Revoke and the Notice of Hearing and provide a school location where the copy may be reviewed;
- Within 20 days of receipt of the Notice the charter operator shall provide copies of all correspondence and communications used to comply with the preceding provision; and
- Within 20 days of receipt of the Notice the charter operator shall provide the Board with the names and mailing addresses of parents/guardians of all students registered with the school.