B. 1 Applicant Entity

B.1.a Applicant History

Phoenix Collegiate Academy, Inc. is a non-profit corporation registered with the Arizona Corporation Commission on October 23, 2007. On December 21, 2007 the official publication of the articles of incorporation occurred in the Arizona Capitol Times. The Federal EIN number for the organization is 90-0364347 and was obtained on March 3, 2008. The 501c3 status was officially granted on June 2, 2008. All supporting documents are attached including the relevant required exhibits: Phoenix Collegiate Academy, Inc. Bylaws, Articles of Incorporation and amendments, recent Annual Report, and documentation of director or officer changes.

In January of 2009, Phoenix Collegiate Academy Charter, Inc. was awarded a charter from the Arizona State Board for Charter Schools. The original charter was to serve 6th-12th grade students by preparing them to succeed in college and be leaders in the community. That charter was amended to add 5th grade in 2011, and was amended to add K-4th grade in 2013.

It is important to the Governing Board that all sites operate with separate charters so that accountability is directly tied to the specific site. Thus, Phoenix Collegiate Academy High School will be applying as its own charter, as shown on the attached board approved minutes.

Phoenix Collegiate Academy, Inc. was founded with the support of Building Excellent Schools, a national program dedicated to training the founders of high-performing charter schools. As such, the Founding Corporate Board of Phoenix Collegiate Academy received Building Excellent Schools board training, which consisted of an extensive retreat and multiple trainings on best governance practices. Since then, the Corporate Board has maintained professional development opportunities though Building Excellent Schools, the Arizona Charter Schools Association and recently in working with The High Bar.

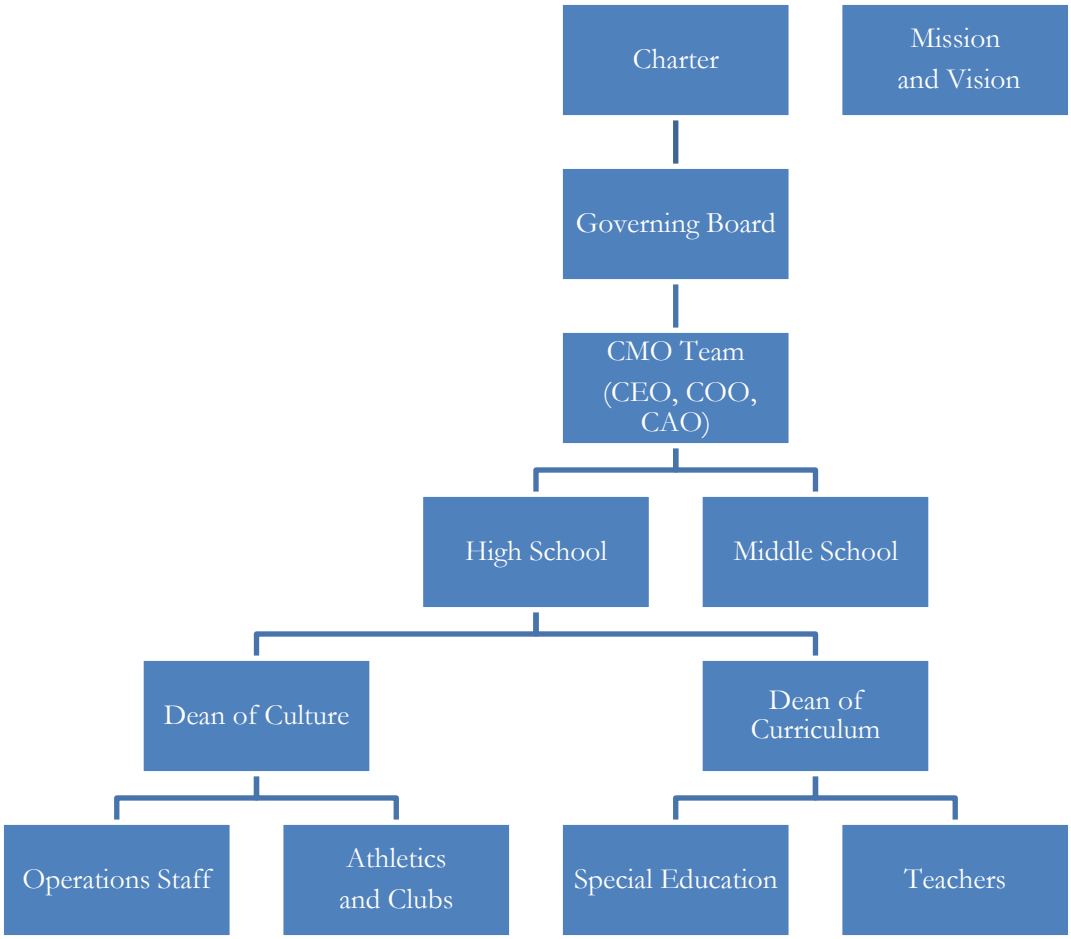
PCA has operated an Arizona charter middle school site for five years and high school site for one year that serves disadvantaged students living in the South Mountain community. Its academic and operational successes have led supporters to encourage its expansion. PCA was one of 3 schools nationally to be selected for Walton Family Foundation expansion funding through the Inflexion Fund for slow-growth of successful charter schools in low-income communities.

At Phoenix Collegiate Academy, Inc., we believe a well-structured effort cannot succeed without strong and effective leadership at all levels. Therefore, we have recruited and continue to recruit accomplished professionals, whose wide range of experiences in managing and governing for-profit and not-for-profit organizations contribute clarity to the vision and mission, and evidence their collective ability to oversee the successful start-up and governance of high-performing charter schools. The Corporate Board has reviewed, contributed to, and supported this charter application and all elements of the school design. Board members were recruited by founder Rachel Yanof or current board members and were selected after a comprehensive process. They were evaluated on the criteria of skills/expertise, teamwork, available time and energy, and philosophical alignment

with the mission of Phoenix Collegiate Academy. The Corporate Board was organized in November 2007 and has been meeting since that date.

At present, we intend that founder and CEO Rachel Yanof will serve as the Chief Executive Officer of Phoenix Collegiate Academy, Inc. In this role, she will oversee all operations and educational planning of all schools (Phoenix Collegiate Academy Middle School, High School and Elementary) and oversee CMO and CMO functions. At the time of chartering, the Governing Board of Trustees will review this intent and re-hire the Founding School Deans (Instructional and Culture) as they have been serving in these capacities for the 2013-14 and 2014-15 school years very effectively under the existing charter.

B.1.b Organizational Chart



The mission, vision, and charter of Phoenix Collegiate Academy drive all decision making for every level. The Governing Board manages Phoenix Collegiate Academy, Inc., which is the current charter holder for all three schools, the Elementary, Middle and High School. The Elementary and High School are both seeking separate charters, but they will be held by the same central organization, Phoenix Collegiate Academy, Inc. The Charter Management Organization level supports operations for all schools (centralized processing and back-office tasks), oversees major

academic initiatives, ensures quality of all schools is of the highest degree, and promotes and fundraises for the organization as a whole.

Reporting Structure Narrative
The narrative defines the reporting structure for each position listed in the organizational chart. (see Figure B.1.b)

The final responsibility to hire, evaluate and terminate employees belongs solely to the School Leaders of each campus. Likewise, in all years, the responsibility to hire, evaluate and terminate the School Leader belongs to the CEO and CMO team of Phoenix Collegiate Academy, Inc. The responsibility to hire, evaluate and terminate the CEO of Phoenix Collegiate Academy, Inc. belongs solely to the Governing Board of Phoenix Collegiate Academy, Inc.

Governing Board: The Governing Board holds the charter and is legally and ethically responsible for the schools. Comprehensively, the board is responsible for all governance issues. Specifically, they oversee:
a) Mission, policy and strategic planning - Articulate and ensure alignment with the school's mission, vision and charter, create and update policy related to the mission and governance, set the strategic direction and review progress against articulated goals over time
b) Financial oversight - Ensure the school's financial health, review and approve the annual budget and ensure adherence to it, participate in fundraising and help secure external funding sources as needed
c) Legal and regulatory compliance - Ensure compliance with all laws and regulations and review compliance on a regular basis, ensure filing of all legal and regulatory documents
d) Chief Executive Officer (CEO) oversight - Select, manage, support, and evaluate the CEO who will be responsible for the organization's day-to-day management, evaluate CEO regularly based on agreed-upon, clearly outlined performance criteria, set CEO compensation annually, offer guidance and support
e) Promotion and accountability to the public - Promote the school to the public, expand the school's networks and relationships, respond to community and stakeholder concerns, and participate actively in the South Phoenix neighborhood.

Charter Management Organization (CMO): The CMO is charged with leading the organization of Phoenix Collegiate Academy, Inc. toward ambitious goals in pursuit of the mission. Comprehensively, the CMO is responsible for organizational health. Specifically, they oversee:

a) Operational and Back-Office Structures – Select vendors for school use, prepare and manage compliance and reporting, bookkeeping, payroll, benefits, IT, auditing, and facilities.
b) Academic Quality Control – Oversight of progress toward school-wide and system-wide goals, monitoring for areas of concern, offering insight and resources to School Leaders, Coordinating CMO-wide professional development.
c) Promotion and Fundraising – Seeks and obtains grants, private donations, and competitive Department of Education monies, promotes the schools and organization, and directs marketing and branding for all schools.
d) Human Resources - Takes on the initial work of recruiting and hiring talent.
e) Student Recruitment- Takes on the initial work of marketing and advertising to students and families.

School Leaders: The School Leaders oversee school performance, provide executive management and ensure organizational viability. The School Leaders oversees academics, budget, and operations for the school site. The School Leaders manage the Operations Team (Operations Manager and Receptionist) and all instructional staff. The School Leaders manage special education compliance with the special education teachers. The School Leaders are hired by, report to, and are evaluated by the CMO team.

Operations Manager (Y1-Y3): The Operations Manager manages daily operations and provides logistical oversight. S/he ensures school records are accurate and up-to-date and programmatic guidelines for reporting and implementation are followed. In addition, with the School Leaders, s/he manages the tracking of data. The Operations Manager reports to and is evaluated by the School Leaders.

Special Education Teacher(s): SPED teachers maintain special needs records, oversee the IEP process, ensure that students with special needs receive accommodations and/or modifications within the classroom, and will be AZ certified in special education. The SPED teacher is hired by, reports to and is evaluated by the School Leaders.

Teachers (including Teaching Fellows and Specials Teachers): Teachers develop and implement curriculum and support all students in reaching clear academic goals. All teachers are Highly Qualified (Teaching Fellows are the only exception) as defined by No Child Left Behind. Teachers are hired by the School Leaders, report to the School Leaders, and are evaluated by the School Leaders

Receptionist: The Receptionist oversees office operations. S/he develops office procedures/policies, files and maintains records, and trains staff members in procedures, systems, and equipment. The Receptionist is hired by the School Leaders with the input of the Operations Manager. The Receptionist reports to and is evaluated by the Operations Manager with the input of the School Leaders.

Janitor: The Janitor will maintain the cleanliness of the building and perform basic repairs as needed. The Janitor is hired by the School Leaders with input from the Operations Manager.

B.1.c Subsidiary Relationships and Prior Charter Operation

Phoenix Collegiate Academy High School is a separate charter held by the Phoenix Collegiate Academy, Inc. Charter Management Organization. The CMO holds the charters of Phoenix Collegiate Academy (MS) and Phoenix Collegiate Academy Elementary School upon authorization.

B.1.d Prior Charter Operation

Phoenix Collegiate Academy, Inc. was chartered to open Phoenix Collegiate Academy (MS and HS) in 2009 and has been in good standing every year of its operation. It was chartered by the Arizona State Board for Charter Schools and will be up for renewal in 2024. The applicant, Rachel Bennett Yanof, is currently the CEO of Phoenix Collegiate Academy, Inc. Phoenix Collegiate Academy, Inc. will serve as the CMO and have oversight authority over Phoenix Collegiate Academy Elementary. Principals at Phoenix Collegiate Academy MS and ES will not have authority or decision making powers at Phoenix Collegiate Academy High School.

B.1.e Role of Principals

Our Governing Board members represent a diverse group of civic leaders with vast expertise and an array of leadership experience that will be essential to the strong governance of Phoenix Collegiate Academy High School. The table below provides an outline of the each member's area of expertise and officer status. Resumes for each principal are attached.

Governing Board Member	Area of Expertise	Officer Status
Rachel Bennett Yanof CEO, Phoenix Collegiate Academy, Inc.	Organizational Management, Education and Instruction, Development and Fundraising.	Non-Voting, *ex-officio* Charter holder of Phoenix Collegiate Academy, Inc. Founder of PCA, Inc.
Janene Miller	Strategic Planning, Talent and Recruitment, Organizational Design	Vice-President
Tomas Reveles	Human Resources, Legal and Compliance, Strategic Planning	Secretary/Treasurer
Michael Zimmerman	Legal and Compliance, Education, School Finance	President

Rachel Yanof, CEO, Phoenix Collegiate Academy, Inc.
Rachel Yanof serves as the Chief Executive Officer for Phoenix Collegiate Academy, Inc. Ms. Yanof spearheaded the development and submission of a successful charter school application in 2009 for Phoenix Collegiate Academy. In pursuit of an excellent school design, and to ensure the strongest educational opportunity for the middle and high school students of the South Mountain area of Phoenix, Ms. Yanof completed a year-long Fellowship with Building Excellent Schools (in 2007-08) which included a residency at Excel Academy, recognized by The Center of Education Reform as one of the top charter schools of 2007. A graduate of Georgetown University in Washington, D.C., Ms. Yanof received a B.A. in Economics and History before she joined Teach For America, a nationally acclaimed and highly selective teaching program. While a member of Teach For America, Ms. Yanof earned her MA in Curriculum and Instruction from Arizona State University. She taught 8th grade for four years at C.O. Greenfield Elementary School. Ms. Yanof has obtained her Certificate in Administration from the University of Phoenix. In the past four years she has led Phoenix Collegiate Academy to obtain two "A" rankings in 2011 and 2012, and the Arizona Charter School of the Year Award from the Arizona Charter School Association in 2012.

Description of the Building Excellent Schools Fellowship: The mission of Building Excellent Schools (BES) is to develop and support school leaders who have the capacity to lead consistently high performing schools and who view solid academic achievement as a necessity for transforming children's lives. BES develops in leaders the skill to: articulate a powerful vision; translate vision into reality; develop their own skills; develop the skills of others; and drive student achievement.
The Fellowship includes the following elements: individual in-school observations and consultations with school principals and their senior staff, written evaluations and recommendations, an off-site retreat with leadership teams from all participating schools, development by leadership

teams of building-level action plans, follow-up visits and retreats to confirm progress and update action plans. BES, in collaboration with participating schools across the country, has documented best practices and has developed leadership training materials.

In addition to the services described above, Building Excellent Schools included the following programmatic components:

- Dedicated training space for leadership seminars and off-site school "action team" meetings.
- Opportunities for cross fertilization of ideas and best practices with other BES participants through a regular series of informal events and focused workshops.
- Development of additional leadership trainers, recruited from the graduates of Building Excellent Schools.

Unlike most other school leadership training programs, which are delivered in an academic environment over a period of days or at most weeks, BES has provided participating charter school leaders with regular, sustained feedback and support, grounded in practice and customized to the specific circumstances of each school. This approach ensures that the concepts of effective leadership are not left on a college campus.

Due to this extensive training, Ms. Yanof is qualified to support in all areas of the school operations.

Michael Zimmerman, President of the Board
Michael Zimmerman serves as the President of the Phoenix Collegiate Academy, Inc. board. He joined the efforts of founding PCA in 2008 and has served as Vice-President and now President. His passion for working to close the achievement gap stems from his experiences as Teach For America corps member in Baltimore, MD where he taught Middle School English for four years. Mr. Zimmerman obtained his B.A. in English from the University of Wisconsin, Madison, his M.A. in The Art of Teaching from Johns Hopkins University, and his J.D. from the Arizona State University Sandra Day O'Connor College of Law. After working with the U.S. Bankruptcy court, he joined Polsinelli Shughart as an associate attorney focusing on tax law and is now at Zwillinger, Greek and Knecht. Mr. Zimmerman is qualified to support the Educational plan through his own passions and experiences serving low-income youth and the Operational plan through his legal and tax background.

Janene (Jan) Miller, Vice-President of the Board
Jan Miller has served on the Phoenix Collegiate Academy board since 2010. She serves as the Vice-President. Ms. Miller is the Director of Talent Management at SRP. She oversees several areas including Talent Acquisition, Learning and Development, Skills Training, and Learning Technology. Ms. Miller has over 25 years of experience in the energy industry. She is a graduate of the Global Leadership Certificate Program at the American Graduate School of International Management (Thunderbird). Ms.Miller has held Principal Analyst and management positions in several areas at SRP including Forecasting and Economic Development, Strategic Planning, Energy Management and Information, Distribution Area Marketing, Research and Development, and Resource Planning. She started work at SRP on the rotational engineering program in 1987, and was an engineer in the Research and Development division for five years prior to becoming a manager. She worked for San Diego Gas and Electric for three years as a Residential Energy Auditor prior to returning to

college to obtain a Bachelor of Science in Mechanical Engineering from Cal Poly State University at San Luis Obispo. Ms. Miller also has Bachelor of Arts degree in Government from Pomona College. Ms. Miller is qualified to support the business plan due to her extensive experience in the corporate work and strategic planning, and to support the operational plan through her ability to source talent and build capacity of programs.

Tomas Reveles, Secretary/Treasurer of the Board
Tomas Reveles has served on the Phoenix Collegiate Academy board since 2011. Mr. Reveles is the Human Resources Manager of US Airways Group for the Phoenix and West Region. Prior to this, Tomas was the Human Resources manager for Las Vegas, Corporate Finance and the Central Region. Mr. Reveles is a native of the South Mountain area of Phoenix and has a passion to serve his home community through providing guidance for an excellent school. He obtained his B.A. in Political Science from Arizona State University, his M.A. in Counseling an Leadership from Northern Arizona University and his J.D. from the University of Wisconsin- Madison Law School. Mr. Reveles is qualified to support the business plan through his knowledge of Human Resources and Organizational Management and the educational plan through his own personal experiences being a student in the system we are working to directly impact at PCA.

B.1.f Current or Prior Charter Operation

The Governing Board has a current charter operation they govern. Phoenix Collegiate Academy MS was chartered in 2009 by the Arizona State Board for Charter Schools. Ms. Miller, Mr. Zimmerman and Mr. Reveles are the Governing Board for Phoenix Collegiate Academy MS, and will also be the Governing Board for Phoenix Collegiate Academy High School.

Required Exhibits:

Please see the following attachments for the required exhibits.

1) Articles of Incorporation, amendments, director changes, and annual report.
2) Minutes to apply for a separate charter for Phoenix Collegiate Academy High School.

Please see the following pages for the required exhibits.

1) Bylaws

Bylaws of Phoenix Collegiate Academy, Inc.

ARTICLE I

Phoenix Collegiate Academy Charter School

5610 S Central Avenue, Phoenix, AZ 85040

Phoenix Collegiate Academy Charter School prepares kindergarten to twelfth grade students to succeed in college and be leaders in our community.

Section 0: The Corporate Board of Phoenix Collegiate Academy Charter School ("Phoenix Collegiate Academy") will meet quarterly and oversee strategic growth of the organization of Phoenix Collegiate Academy Inc. In all local school matters, the Corporate Board of Phoenix Collegiate Academy, Inc. will delegate responsibility for the governance of Phoenix Collegiate Academy to the School Governing Board.

Section 1: The name of the organization will be Phoenix Collegiate Academy, Inc.

Section 2: The initial principal location of Phoenix Collegiate Academy shall be at:

5610 S Central Avenue

Phoenix, AZ 85040

Phoenix Collegiate Academy may also have offices at such other places as the Governing Board (Board) shall determine the business of Phoenix Collegiate Academy requires; provided, however, that the registered office be registered with the Secretary of State of Arizona and the agent so registered be located at the same address, or otherwise as provided by the Governing Board.

Section 3: The purposes for which the Phoenix Collegiate Academy Charter School is organized is to prepare students in grades kindergarten through twelve for success in elementary, middle and high school through college, through a demanding education based on high standards, structure, and accountability.

Section 4: If, for any reason, the organization should dissolve, upon dissolution of the organization assets shall be distributed for one or more exempt purposes within the meaning of section 501 (c) (3) of the Internal Revenue Code, or corresponding section of any future federal tax code, or shall be distributed to the federal government, or to a state or local government, for a public purpose.

ARTICLE II

Members

Phoenix Collegiate Academy does not have members. While persons who associate or attend programs of, participate in, contribute to, or benefit from Phoenix Collegiate Academy may be referred to as "member," no rights, voting or otherwise, will inure to such person.

ARTICLE III

Board of Trustees

Section 1: The Governing Board ("the Board") shall consist of at least three Trustees and no more than thirteen Trustees. All Trustees shall have identical rights and responsibilities. The Chief Executive Officer will be an advisory, non-voting member of the Board (*ex officio*). Any current employee may not be a Trustee.

Section 2: Board members shall be sought who reflect the qualities, qualifications and diversity determined by the Board delineated in the Board Member Expectations document.

Section 3: The Phoenix Collegiate Academy nominating committee, known as the Governance Committee, shall present a slate of potential Trustees and officers for election by the Governing Board. This slate shall be presented at the annual meeting of the Board.

Section 4: Trustees shall serve a term of three (3) years from the date of their appointments with annual renewal, or until their successors are seated. A full three-year term shall be considered to have been served upon the passage of three (3) annual meetings. After election, the term of a Trustee may not be reduced, except for cause as specified in these bylaws. No Trustee shall serve more than two (2) consecutive, three-year terms. Trustees shall serve staggered terms to balance continuity with new perspective.

Section 5: The initial Governing Board will serve staggered terms. The initial Board shall consist of at least two Trustees who will serve a one-year term (ending in Winter 2010), at least two Trustees who will serve a two-year term (ending in Winter 2011), and at least two Trustees will serve a three-year term (ending in Winter 2012).

Section 6: Any vacancy occurring in the Governing Board and any position to be filled by reason of an increase in the number of Trustees may be filled, upon recommendation of a qualified candidate by the Governance Committee, by two-thirds (2/3) vote of the seated Trustees. A Trustee elected to fill the vacancy shall be elected for the unexpired term of his/her predecessor in office.

Section 7: A Trustee may resign at any time by filing a written resignation with the Chair of the Board.

Section 8: The Board may remove any Officer or Trustee with or without cause by two-thirds (2/3) vote of the entire Governing Board at any regular or special meeting of the Board, provided that a statement of the reason or reasons shall have been mailed by Registered Mail to the Officer or Trustee proposed for removal at least thirty (30) days before any final action is taken by the Board. This statement shall be accompanied by a notice of the time when, and the place where, the Board is to take action on the removal. The Officer or Trustee shall be given an opportunity to be heard and the matter considered by the Board at the time and place mentioned in the notice.

Section 9: Members of the Governing Board:

(a) Shall receive no payment of honoraria, excepting reimbursement for expenses incurred in performance of voluntary Phoenix Collegiate Academy activities in accordance with Phoenix Collegiate Academy Charter School policies.
(b) Shall serve the Phoenix Collegiate Academy Charter School with the highest degree of undivided duty, loyalty, and care and shall undertake no enterprise to profit personally from their position with the Phoenix Collegiate Academy Charter School.
(c) Shall be bound by the Code of Conduct, Conflict of Interest and Confidentiality policy statements.
(d) Shall have no direct or indirect financial interest in the assets or leases of the Phoenix Collegiate Academy Charter School; any Trustee who individually or as part of a business or professional firm is involved in the business transactions or current professional services of the Phoenix Collegiate Academy Charter School shall disclose this relationship and shall not participate in any vote taken with respect to such transactions or services.

ARTICLE IV

Officers

Section 1: There shall be three (3) elected Officers of the Board: a Chair, a Vice Chair, and a Secretary/Treasurer. Each office will be held by a separate person.

Section 2: The Governance Committee shall present a slate of Officers to the Governing Board. The nominated Officers shall be drawn from among the members of the Governing Board. The election of Officers shall be held at the annual meeting of the Board.

Section 3: The newly elected Officers shall take office on the Monday following the annual board retreat (held in January/February of each year) following the close of the meeting at which they are elected and the term of office shall be one year, or until respective successors assume office. A Trustee may serve more than one (1) year in the same office.

Section 4: In the event that the office of the Chair becomes vacant, the Vice-Chair shall become Chair for the unexpired portion of the term. In the event that the office of Vice-Chair or Secretary/Treasurer becomes vacant, the Chair shall appoint and approve interim Officers to fill such vacant offices until a scheduled meeting of the Board can be held and elections can take place.

ARTICLE V

Meetings

Section 1: The annual meeting of the Governing Board shall occur in the third quarter of the fiscal year. There shall be at least 6 other regular meetings of the Board held each year. Notice shall be given to each Trustee thirty (30) days prior to the date of every regular meeting of the Board.

Section 2: Special meetings of the Governing Board may be called by the Chair or by a majority of the Board filing a written request for such a meeting with the Chair and stating the object, date, and hour therefore, due notice having been given each Trustee two (2) calendar days prior to the meeting.

Section 3: One-half of the Trustees then in office shall constitute a quorum for the transaction of business at any regular or special meeting of the Governing Board, except where otherwise required by these Bylaws.

Section 4: The Board shall select its own meeting format in any method allowed by the laws of the state of Arizona. Any such meeting, whether regular or special, complying with Sections 1 or 2 of Article V shall constitute a meeting of the Governing Board and shall subscribe to the policies, procedures, and rules adopted by the Board.

Section 5: Notice of all regular and special meetings of the Board, an agenda of all items to be discussed at such meetings, and agenda support materials shall be circulated to all Trustees 24 hours prior to the meeting. Any Trustee may waive notice of any meeting. The attendance of a Trustee at any meeting also shall constitute a waiver of notice of such meeting, except where a Trustee attends a meeting for the express purpose of objecting to the transaction of any business because the meeting is not lawfully called or convened.

Section 6: An absentee Board member may not designate an alternate to represent him or her at a Board meeting. A member of the board may be deemed to be present for purposes of achieving a quorum and may cast a vote if he/she grants a signed, written proxy to another board member who is present at the meeting. The proxy must direct a vote to be cast with respect to a particular proposal that is described with reasonable specificity in the proxy. No other proxies are allowed.

ARTICLE VI

Committees and Task Forces

Section 1: A Board resolution shall appoint committees or task forces of the Board, except the Governance Committee. Committees may be composed of Trustees or community members, or both but all committees must have at least one board member involved. The Board may prescribe the need and/or the composition of such committees.

Section 2: There shall be a standing nominating committee, known as the Governance Committee. This committee shall be composed of at least two (2) persons recommended by the Chair and elected by the Governing Board at its annual meeting. Each committee member shall serve a term of one (1) year, and these terms shall be staggered to ensure continuity of committee membership. The committee should be chaired by the Board Chair.

Section 3: The duties of the Governance Committee shall be:

(a) to study the qualifications of candidates and present a slate of the best qualified as nominees for the vacant Trustee positions on the Board;

(b) to present a slate of nominees for Officers to the Board for election at the annual meeting;

(c) to recommend candidates to the Board to fill vacancies that arise outside the regular nominating process;

(d) to provide ongoing orientation to Trustees;

(e) to oversee a Trustee assessment process to ensure optimum performance; and

(f) to recommend the appointment of a past Chair to the Board, if necessary, in the interests of continuity.

ARTICLE VII

Fiscal Year

The fiscal year of the Phoenix Collegiate Academy Charter School shall begin on July 1 of each calendar year and terminate on June 30 of the following year.

ARTICLE VIII

Rules of Order

In case of conflict or challenge, the rules of order of Parliamentary Procedure shall govern the conduct of all meetings of Phoenix Collegiate Academy Charter School.

ARTICLE IX

Amendments

These Bylaws may be amended at a regular meeting by a two-thirds vote of all Trustees then in office; provided that notice of the proposed amendment, together with a copy thereof, is distributed to each Trustee at least five (5) days prior to the meeting at which the amendment is to be considered.