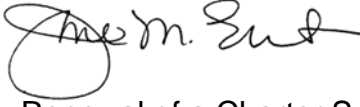


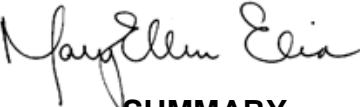


TO: P-12 Education Committee

FROM: Jhone M. Ebert 

SUBJECT: Charter Schools: Renewal of a Charter School Authorized by the Board of Education of the City School District of the City of Buffalo

DATE: April 11, 2016

AUTHORIZATION(S): 
SUMMARY

Issue for Decision

Should the Board of Regents approve the proposed renewal charters for the following two charter schools authorized by the Board of Education of the City School District of the City of Buffalo:

1. Enterprise Charter School (3 year renewal)
2. Westminster Community Charter School (5 year renewal)

Reason(s) for Consideration

Required by New York State law.

Proposed Handling

This issue will be before the Board of Regents P-12 Education Committee and the Full Board for action at the April 2016 Regents meeting.

Procedural History

The Board of Education (BOE) of the City School District of the City of Buffalo (Buffalo BOE) approved two renewal charters which are being presented to the Board of Regents for approval and issuance of the renewal charters as required by Article 56 of the Education Law.

Background Information

I forward the recommendations for the proposed renewal charters for the following charter schools as proposed by the Buffalo BOE as a charter school authorizer under Article 56 of the Education Law.

Pursuant to Education Law §2852, the Board of Regents have the authority to issue charters to all charter schools in New York State. The process for Buffalo BOE authorized charter schools is as follows:

- Buffalo BOE recommends that the Board of Regents issue a charter renewal or a revision of an existing charter.
- The recommendation is sent to the Department and the Board of Regents have 90 days to act or the recommendation goes into effect by operation of law (“OOL”).
- Once a charter is received by the Department, the Board of Regents have four options:
 1. Consider the recommendation and vote on it. If the vote is affirmative, the action is effective immediately, or as otherwise recommended by Buffalo BOE.
 2. If the Board of Regents choose not to vote in the affirmative, the recommendation is sent back to Buffalo BOE with comments. Buffalo BOE must reconsider its recommendation, and can choose to either resubmit the proposed charter to the Board of Regents with modifications, provided that the applicant consents in writing to such modifications, resubmit the proposed charter to the Board of Regents without modifications, or abandon the proposed charter. If the recommendation is resubmitted to the Board of Regents, the 90-day clock is reset.
 3. The Board of Regents can defer action to a later date. The 90-day time period continues to accrue.
 4. The Board of Regents can choose to not take action on a Buffalo BOE recommendation and allow the charter renewal or revision to an existing charter to go into effect by OOL 90 days after the initial submission to the Department.

ENTERPRISE CHARTER SCHOOL

Table 1: School Summary

Name of Charter School	Enterprise Charter School
Board Chair	Thomas Ess
District of Location	Buffalo City School District
Opening Date	August, 2003
Charter Terms	Initial charter term: March 2003 - March 2008 First renewal term: March 2008 - June 30, 2010 Second renewal term: July 1, 2010 - June 30, 2013 Third renewal term: July 1, 2013 - June 30, 2014 Fourth renewal term: July 1, 2014 - June 30, 2016
Facility	275 Oak Street Buffalo, NY 14203
Current Grade Levels / Number of Students	K-8 405
Mission Statement	<p>“The Mission of Enterprise Charter is to engage young minds through projects and partnerships.”</p> <p>The school mission will become: “We are leaders who push to succeed through partnerships, hard work, and a commitment to our future”.</p>
Proposed Renewal Term	Three years, from July 1, 2016 to June 30, 2019, with academic corrective action.

In 2003, the Buffalo Board of Education, in its capacity as a charter school authorizer under Article 56 of the Education law, approved the initial five-year charter for Enterprise Charter School as a K-12 school, and a charter was approved and issued by the Board of Regents. In 2008, the Buffalo Board of Education approved and submitted to the Board of Regents a five-year renewal for Enterprise, which would have allowed the School to serve grades K-12 until the end of the 2007-08 school year and then to serve grades K-8 for the remainder of the proposed charter renewal term. Citing weak academic results, especially at the secondary level in ELA, and an audit by the Comptroller that raised questions related to the school’s financial and accounting practices, the Board of Regents did not approve the proposed five-year renewal charter for Enterprise and instead returned the proposed renewal charter to the Buffalo BOE for

reconsideration. The Board of Regents recommended that the Buffalo BOE only approve a short-term renewal for Enterprise until the end of the 2009-10 school year (June 30, 2010). The Buffalo BOE subsequently approved, and submitted to the Board of Regents, a short-term renewal for Enterprise that allowed Enterprise to serve grades K-12 until the end of the 2007-08 school year and then to serve grades K-8 until June 30, 2010 (a two-year renewal).

In 2010, the Buffalo BOE approved and submitted to the Board of Regents, a second charter renewal for Enterprise to operate as a K-8 school until June 30, 2013 (a three-year renewal). The Board of Regents approved and issued the second renewal charter as submitted by the Buffalo BOE. In 2013, the Buffalo BOE approved and submitted to the Board of Regents, a third renewal charter for Enterprise Charter School that would have expired on June 30, 2016. Citing weak academic results, the Board of Regents voted to return that renewal recommendation to the Buffalo Board of Education for reconsideration, pursuant to Education Law §2852(5-a). The Buffalo Board of Education subsequently approved a one-year charter renewal for Enterprise. In July 2013, the Board of Regents approved the one-year charter renewal for Enterprise which expired on June 30, 2014.

In January 2014, the Buffalo BOE approved a fourth renewal charter for Enterprise Charter School and submitted the proposed renewal charter to the Board of Regents for approval and issuance of the renewal charter. The proposed renewal term is a two-year term expiring on June 30, 2016. The Buffalo BOE did not approve the School's request for permission to expand maximum enrollment from 405 to 432 students.

In February 2016, Enterprise Charter School was identified as a Priority School as a result of being among the lowest performing schools in the State (bottom 7th percentile) and failing to demonstrate progress in ELA or math. In February 2016, the Buffalo BOE approved a fifth renewal charter for Enterprise Charter School and submitted that proposed renewal charter to the Board of Regents for approval and issuance of the renewal charter. The proposed renewal term is a three-year term expiring on June 30, 2019. Buffalo will require Enterprise to develop and implement an academic corrective action plan to improve academic achievement. Buffalo, as the charter authorizer, recognizes the need for continued growth at the school, and intends to work collaboratively with the charter school's leaders during the renewal period.

Buffalo considered the following factors in making the renewal recommendation:

- Enterprise's recruitment of community partners;
- Enterprise Enrollment Demographics – See table below; and
- Proposed Academic Interventions, which include 1) Reimagined human and fiscal resources to provide more intensive and cohesive support to both teachers and students (i.e. coaching, embedded professional development, and student interventions to increase the number of level 3 and 4 students on the NYS assessments, and 2) As reported by Enterprise: the use of

Independent Reading Level Assessment (IRLA) demonstrates that there has been an almost 10% gain in student reading. The school notes that IRLA has a correlation between the number of students at or above grade level in IRLA and the performance on the ELA assessment.

- The school’s Corrective Action Plan will include:
 - A. Highlights of the corrective action plan's initiatives
 - B. Current student outcome data and yearly targets to close the achievement gap between the charter school, the Buffalo Public School District and the State average during the renewal period (Overall average and subgroups)
 - C. School Leader Practices and Decisions
 - D. Curriculum Development and Support
 - E. Teacher Practices and Decisions
 - F. Quarterly progress monitoring reports submitted to the District for ELA, Math, Attendance and Suspensions (Overall average and subgroups)

In addition, Buffalo also considered the school’s proficiency, progress towards meeting goals; Culture, Climate and Family Engagement; Organizational and Fiscal Soundness; Board Oversight and Governance; Organizational Capacity; Mission and Key Design Elements; Enrollment, Recruitment and Retention; and Legal Compliance, as set forth below.

Table 2: Enrollment

School Year	Chartered Enrollment	Actual Enrollment	Grades Served
2015-2016	405	405	K-8
2014-2015	405	405	K-8
2013-2014	405	405	K-8
2012-2013	405	405	K-8
Maximum enrollment: 405			

Table 3: Current Board of Trustees

Board Member Name	Term	Position/Committees
Thomas Ess	July 1, 2014-July 1, 2017	Board Chair
David Cantaffa	July 1, 2014-July 1, 2016	Academic
Michael Donlon	July 22, 2015-July 1, 2018	Vice-Chairperson, HR Personnel
Crystal Elias	July 1, 2014-July 1, 2017	Academic
Denise Terrell	July 22, 2015-July 1, 2018	Parent
Maritza Baez	September 16, 2013-July 1, 2016	Board Secretary, Academic
Jason Ulatowski	May 11, 2015-July 1, 2017	Audit/ Finance

Table 4: School Leader(s)

School Year	School Leader(s) Name and Title
December 7, 2015-Present	Paul Hashem, Interim Head of School
November 26- December 6, 2015	Melissa Laun, Acting Head of School
September 2011- November 25, 2015	Heather Lyon Ph. D., Head of School

Table 5: Enterprise Charter School Academic Achievement

All Students	ELA					Math				
	Enterprise CS	Buffalo CSD	Variance to District	NYS	Variance to NYS	Enterprise CS	Buffalo CSD	Variance to District	NYS	Variance to NYS
2013-2014	16%	12%	+4%	31%	-15%	12%	14%	-2%	39%	-27%
2014-2015	10%	12%	-2%	32%	-22%	6%	15%	-9%	39%	-33%

Table 6: Enterprise Charter School Demographics Compared to District of Location

	2013-2014			2014-15		
	Enterprise	Buffalo CSD	Variance	Enterprise	Buffalo CSD	Variance
Students with Disabilities	20%	21%	-1%	18%	21%	-3%
Limited English Proficient	12%	13%	-1%	9%	13%	-4%
Economically Disadvantaged	98%	75%	+23%	97%	75%	+22%

Enterprise Charter School Reported a 78% retention rate for the 2014-2015 academic year.

Summary of Public Comment

The Buffalo Board of Education directly provided notice to public and private schools in the region of the charter school regarding the renewal. The Public hearing was held on January 20, 2016, to solicit comments from the community. Forty-five members of the community were present and nine individuals commented during the hearing. Thirty-six individuals sent written comments. All forty-five comments were in favor of the proposal and zero comments were in opposition. Comments in favor focused on the positive school community, the academics and the professional development offered at the school.

See Attachment A for additional information regarding the school's performance in the following categories:

- Teaching and Learning
- Progress Towards Goals
- Culture, Climate and Family Engagement
- Organizational Soundness
- Organizational Capacity
- Faithfulness to the Charter and Law

WESTMINSTER COMMUNITY CHARTER SCHOOL

Table 1: School Summary

Name of Charter School	Westminster Community Charter School (WCCS)
Board Chair	David K. Chamberlin
District of Location	Buffalo Public School District
Opening Date	September 2004
Charter Terms	Initial charter term: July 2004– June 2009 First renewal term: July 2009 – June 2014 Second renewal term: July 2014– June 2016
Facilities	24 Westminster Avenue Buffalo, NY 14215
Current Grade Levels/Number of Students	K-8 550
Partners	M & T Bank
Mission Statement	“To challenge the status quo – to encourage people to think differently about their station in life. We do this through assuring that there are high levels of learning, by creating a safe and caring environment, and promoting community involvement in order to prepare students for a successful secondary experience.”
Proposed Renewal Term	Five years, from July 1, 2016 to June 30, 2021, with academic corrective action.

In 2004, the Buffalo BOE, in its capacity as a charter school authorizer under Article 56 of the Education Law, approved the initial five-year charter for Westminster Community Charter School as a K-8 conversion charter school, and a charter was approved and issued by the Board of Regents. The School commenced instruction as a charter school in September 2004. It currently serves 550 students in grades K-8. The Buffalo BOE approved a five-year renewal charter in 2009 which was approved and issued by the Board of Regents. That charter expired on June 30, 2014.

In January 2014, citing some concerns about student performance at the School, the Buffalo BOE approved a two-year renewal charter for Westminster Community

Charter School and in May 2014, submitted that proposed renewal charter to the Board of Regents for approval and issuance of the renewal charter. The proposed renewal term for a two-year period was approved and expires on June 30, 2016. The Buffalo BOE did not approve the School's request for permission to expand maximum enrollment from 550 students to 575 students.

In February 2016, the Buffalo BOE approved a second renewal charter for Westminster Community Charter School and submitted that proposed renewal charter to the Board of Regents for approval and issuance of the renewal charter. The proposed renewal term is a five-year term expiring on June 30, 2021. Buffalo will require Westminster Community Charter School to develop and implement an academic corrective action plan to improve academic achievement. Buffalo, as the charter authorizer, recognizes the need for continued growth at the school, and intends to work collaboratively with the charter school leaders during the renewal period.

Buffalo considered the following factors in making the renewal recommendation:

- Westminster's services of Buffalo students – See table below
- The school's Corrective Action Plan will include:
 - Highlight of the corrective action plan's initiatives
 - Current student outcome data and yearly targets to close the achievement gap between the charter school, the BPS District and the NYSED average during the renewal period (Overall average and subgroups)
 - School Leaders Practices and Decisions
 - Curriculum Development and Support
 - Teacher Practices and Decisions
 - Quarterly progress monitoring reports submitted to the District for ELA, Math, Attendance and Suspensions (Overall average and subgroups)

In addition, Buffalo also considered the school's proficiency, progress towards meeting goals, Culture, Climate and Family Engagement, Organizational and Fiscal Soundness, Board Oversight and Governance, Organizational Capacity, Mission and Key Design Elements, Enrollment, Recruitment and Retention, and Legal Compliance, as set forth on the following page.

Table 2: Enrollment

School Year	Chartered Enrollment	Actual Enrollment	Grades Served
2015-2016	550	542	K-8
2014-2015	550	545	K-8
2013-2014	550	549	K-8
2012-2013	550	553	K-8
Maximum enrollment: 550			

Table 3: Current Board of Trustees

Board Member Name	Term	Position/Committees
Ronald E. Banks	Elected August 2004 Current term expires June 2016	Member/HR/Personnel
Terenda Brown	Elected October 2004 Current term expires June 2016	Parent/Parent Representative
Dianne Cozzo	Elected October 2014 Current term expires June 2016	Member/Education; HR/Personnel
Mark J. Czarnecki	Elected August 2004 Current term expires June 2016	Board Chair/Finance
Rita Eisenbeis	Elected December 2005 Current term expires June 2016	Member/Education, HR/Personnel
Yvonne S. Minor-Ragan	Elected August 2004 Current term expires June 2016	Member/Education, HR/Personnel
Rosalyn Taylor	Elected October 2014 Current term expires June 2016	Member/Education, HR/Personnel
Robert G. Wilmers	Elected August 2004 Current term expires June 2016	Member/Finance
Board Member Name	Term	Position/Committees

Table 4: School Leader(s)

School Year	School Leader(s) Name and Title
January 2015-Present	Robert Ross, Principal
2013-January 2015	Dr. Ayindé Rudolph, Principal

Table 5: Westminster Community Charter School Academic Achievement

All Students	ELA					Math				
	WCCS	Buffalo CSD	Variance to District	NYS	Variance to NYS	WCCS	Buffalo CSD	Variance to District	NYS	Variance to NYS
2013-2014	10%	12%	-2%	31%	-21%	14%	14%	0%	39%	-25%
2014-2015	16%	12%	+4%	32%	-16%	17%	15%	+2%	39%	-22%

Table 6: Westminster Community Charter School Demographics Compared to District of Location

	2013-2014			2014-15 ³		
	School Enrollment	Buffalo CSD Enrollment	Variance	School Enrollment	Buffalo CSD Enrollment	Variance
Students with Disabilities	12%	21%	-9%	12%	21%	-9%
Limited English Proficient	0%	13%	-13%	0%	13%	-13%
Economically Disadvantaged	89%	75%	+14%	90%	75%	+15%

Westminster Community Charter School Reported an 80% retention rate for the 2014-2015 academic year.

Summary of Public Comment

The Buffalo Board of Education directly provided notice to public and private schools in the region of the charter school regarding the renewal. The Public Hearing was held on January 20, 2016, to solicit comments from the community. Fifty-three members of the community were present and seven individuals commented during the hearing. Thirty-four written comments were submitted on behalf of the attendees. All fifty-three of the comments were in favor of the proposal and zero comments were in opposition. Comments in favor focused on various academic and ancillary course offerings as well as strong parent and family connection in the community. WCCS is supported by M and T bank.

See Attachment B for additional information regarding the school's performance in the following categories:

- Teaching and Learning
- Progress Towards Goals
- Culture, Climate and Family Engagement
- Organizational Soundness
- Organizational Capacity
- Faithfulness to the Charter and Law

Recommendations

VOTED: That the Board of Regents finds that the proposed charter school: (1) meets the requirements set out in Article 56 of the Education Law, and all other applicable laws, rules and regulations; (2) will operate in an educationally and fiscally sound manner; (3) is likely to improve student learning and achievement and materially further the purposes set out in subdivision two of section twenty-eight hundred fifty of Article 56 of the Education Law; and (4) will have a significant educational benefit to the students expected to attend the charter school, and the Board of Regents therefore approves and issues the renewal charter of **Enterprise Charter School** as proposed by the Board of Education of the City School District of the City of Buffalo, and that its provisional charter be extended for a term up through and including June 30, 2019.

VOTED: That the Board of Regents finds that the proposed charter school: (1) meets the requirements set out in Article 56 of the Education Law, and all other applicable laws, rules and regulations; (2) will operate in an educationally and fiscally sound manner; (3) is likely to improve student learning and achievement and materially further the purposes set out in subdivision two of section twenty-eight hundred fifty of Article 56 of the Education Law; and (4) will have a significant educational benefit to the students expected to attend the charter school, and the Board of Regents therefore approves and issues the renewal charter of **Westminster Community Charter School** as proposed by the Board of Education of the City School District of the City of Buffalo, and that its provisional charter be extended for a term up through and including June 30, 2021.

Timetable for Implementation

The Board of Regents action for the above named charter schools will become effective immediately.

Attachments

ENTERPRISE CHARTER SCHOOL

Teaching and Learning

During the Renewal visit, BPS staff evaluations found that instruction was not high quality or rigorous. Learning time was not maximized, student engagement varied. BPS staff evaluations found that the school has a clearly documented curriculum for all academic areas. ECS employs a Reader and Writer's Workshop for ELA. The school follows the NYSED ENGAGENY Math modules. The school acknowledged the need to improve the quality of instruction of the recently adopted Math Modules, the need for better monitoring of pacing and the need for teachers to better understand the strands and Math standards. During the 2015-2016 school year, ECS has contracted with an outside vendor (Metamorphosis) that will focus on Math instruction and curriculum.

Formative and summative assessments are purposefully administered at ECS. The school uses at the Independent Reading Level Assessment to determine the instructional level of students. The school uses the Response to Intervention Model. As evidenced in visits during the term of the current Renewal, Data Driven Instruction meetings occur on a weekly basis and student goals are developed using the Steven Covey model for developing student goals. Teachers review data, but data has not been effectively used to inform, guide, or improve instructional practice

The school has put some systems and procedures in place to monitor the academic program. However, these strategies have not led to improved student achievement on the Common Core tests. ECS leadership has acknowledged that the leadership team must provide follow-up classroom observations to ensure rigorous instruction is taking place in the classroom on a regular basis.

The school has not made significant/continuous progress toward meeting its performance goals. For the current charter term (July 1, 2014-June 30, 2016) ECS provided goals for student performance. The goals and outcomes are listed below and include self-reported data from the Renewal Application.

Progress Towards Goals (Self-Reported by ECS)

Goal	Outcomes: Met or Not Met
1. Annually increase the number of students at Level 3 by 10%	2014-2015 ELA- Met in Grade 6 Not met in all other grades Math – Not met
2. Increase Enterprise’s scores according to the Commissioner’s Performance Index for AYP.	2014-2015 ELA- Not met Math – Not met Met in Science for Hispanic
3. By the end of the renewal term, students in grades 3-8 who have been continuously enrolled at Enterprise will perform on par with State proficiency rates on the NYS ELA and Math assessments.	2014-2015 ELA- Not met Math- Not met
4. 80% of students continuously enrolled in Enterprise will achieve benchmark status according to AIMSWeb by year-end test results.	2014-2015 ELA- Not Met Math – Met in Grade 2 Not met in all other grades
5. 80% of students continuously enrolled in Enterprise will maintain a Level 3 or increase to a Level 4 on the NYS ELA and math assessment.	2014-2015 ELA- Met in 5 th and 8 th grade Not met in all other grades Math – Met in Grade 6 Not met in all other Grades
6. 75% of the continuously enrolled students in grades 1-8 will demonstrate a year’s growth on the Terra Nova Reading and Math Assessment.	This test is no longer used at Enterprise Charter School

Culture, Climate and Family Engagement

ECS demonstrates an environment that is generally physically safe and free from harassment and discrimination (2015 Site Visit Report). The school employs the Leader in Me protocol. This protocol develops leaders among the students. The school also participates in the Positive Behavior Interventions and Support (PBIS). PBIS implementation demonstrates that all adults and students have a common language regarding specific expectations in the classroom. It should be noted that the Renewal visit in the Fall of 2015 did find that some behaviors of students outside the classroom needed to be addressed. The BPS team spoke to the leadership team to put some procedures in place in hallways so that all student were

safe. The visit on December 10, 2015 demonstrated that the school put some procedures in place (main hallway divided into left and right side for student travel).

Organizational Soundness

Financial Condition

Enterprise Charter School has a sound financial condition as evidenced in the school's financial statements. The school is determined to have a strong financial condition.

Overall Financial Outlook

Overall, the financial outlook for Enterprise Charter School is positive and the charter school is fiscally sound. The composite score which is an overall measure of the financial health of the charter school calculated by the NYSED office of Audit Services for Enterprise Charter School in 2014 was 2.60 and for 2013 was 2.50. The 2015 composite score calculated by the NYSED office of Audit Services have not been released. Based on a review of financial information from the year ended June 30, 2015 financial statements, data indicates the 2015 composite score will be comparable to the 2014 composite score. Charter schools are measured on three financial ratios that are blended to produce a single composite score. The financial ratios used to calculate the composite score are the primary reserve ratio, equity ratio and net income ratio. A composite score between 1.5 and 3.0 is considered to be in strong financial health.

Near-Term Indicators

Near term financial indicators are used to understand current and short-term financial performance and viability of the charter school. The financial ratios include the current ratio, unrestricted days cash, and revenue variance enrollment.

The current ratio is a measure of operational efficiency and short-term health. For the years ending June 30, 2015 and 2014, the current ratio was 4.4 and 4.6. A current ratio over one is considered a healthy organization.

Unrestricted days cash is a measure of how many days a school can pay its expenses without another inflow of cash. For the years ending June 30, 2015 and 2014, the unrestricted days cash was 294 and 256. Thirty or more days unrestricted cash on hand is considered low risk.

Enrollment stability indicates whether or not the school is meeting its enrollment projections and generating sufficient revenue to fund ongoing operations. For the years ending June 30, 2015 and 2014, the enrollment stability is 100% for both years, which shows the actual enrollment is meeting enrollment projections. Enrollment variances equal to or exceeding 95% is considered to meet the standard.

Overall, the near term financial indicators for Enterprise Charter School indicate the school is fiscally sound and operating effectively. For the year ending June 30, 2015, net assets increased \$317,928 from \$4,340,545 to \$4,658,473 for the years ended June 30, 2014 and 2015.

Long-Term Indicators

Long-term financial indicators are used to understand long-term financial performance and viability of the charter school.

The four financial ratios used are total margin, debt to asset ratio, cash flow, and debt service coverage ratio.

The total margin measures the deficit or surplus of revenue to determine if a school is operating within its available resources. For the years ending June 30, 2015 and 2014, the total margin was 5% and 4%. A positive total margin is an indicator of low risk. Debt to assets ratio measures the extent to which the school relies on borrowed funds to finance its operations. For the years ending June 30, 2015 and 2014, the debt to assets ratio was .56 and .58. A ratio under .9 is considered to meet the standard for low risk. Cash flow for the years ending June 30, 2015 and 2014, increased \$496,380 and \$205,565, respectfully. The increase in cash flow indicates the Charter School is operating efficiently. Debt service coverage ratio is a measure of cash flow available to pay debt obligations for the years ending June 30, 2015 and 2014, is 1.94 and 1.87, respectfully. A debt service coverage ratio exceeding 1.10 is considered low risk.

Overall, Enterprise Charter School is fiscally sound based on the long-term financial indicators.

Financial Management

Financial oversight is completed by Enterprise Charter School's Board. Additionally, financial data is provided to the Buffalo Public Schools Finance office on a monthly basis. The Buffalo Public Schools Finance office financial monitoring includes reviewing monthly financial statement reports, monthly check registers, monthly board meeting minutes, budgets, and annual Form 990. Enterprise Charter School adheres to a balanced budget and follows generally accepted accounting practices.

The Charter School follows generally accepted accounting policies (GAAP). The Charter School adheres to a balanced budget that is reviewed by the Buffalo Public Schools Finance office. The school is operating pursuant to a long-range financial plan reviewed by the Buffalo Public Schools Finance office.

In March 2015, the Office of the State Comptroller issued an audit of Enterprise Charter School's enrollment and billing over the period from July 1, 2013- October 28, 2014. The objective of the audit was to examine the student enrollment and billing processes. The audit

report recommended that school officials periodically verify students' residences and should require new proof of residence when a student moves.

Audited Financial Statements

An annual audit of the school's financial statements is conducted by an independent certified public accountant in accordance with Government Auditing Standards. The independent auditor's opinion for the years ending June 30, 2015 and 2014 is unqualified. Further, the audit for year-end June 30, 2015 and 2014, did not identify any deficiencies in internal control that would be considered to be a material weakness. The audited financial statements are included as part of annual report to the charter entity and Board of Regents. For oversight purposes, the financial reports are also shared with the Buffalo Public Schools Finance Office.

Internal Controls

It should be noted that an internal audit risk assessment has not been performed since 2011. It is recommended that an internal audit risk assessment be performed for Enterprise Charter School periodically.

Enterprise Charter School has a formal accounting policies and procedures manual that has been reviewed by the School's board as well as Buffalo Public Schools Finance Office.

Auditor Independence

Annually, an audit of the school's financial statements are conducted by an independent certified public accountant in accordance with Government Auditing Standards. For the fiscal years ending June 30, 2015 and 2014, the financial statements are in accordance with Government Accounting Standards.

Audit Guide

The financial statements audited by the independent auditor for fiscal years ending June 30, 2015 and 2014 adhere to the Charter School Audit Guide.

Board Oversight and Governance

The Enterprise Charter School Board of Trustees (BOT) provides adequate stewardship or oversight of the school.

According to ECS 2016 renewal application, the board has established goals outside of the school's performance goals, by engaging in strategic planning such as using Board on Track, an online board management system to develop knowledge and skills as an

effective BOT member. Further, the BOT is collecting data (Employee Services Corporation) on school climate and culture to inform future planning. The ECS Board of Trustees evaluates the performance of the school leader using a protocol based on the Vanderbilt Assessment of Leadership in Education (VAL-ED). The school leader is evaluated on core components (i.e. performance accountability) to improve the academic and social learning as well as the processes chosen to accomplish improved academic performance (i.e. plan, support, communicate, and monitor). The BOT meets monthly. Financial statements and minutes are shared with Buffalo Public Schools on a regular basis. During the recent ECS visit, the BOT members described how they evaluate their strengths and concerns during the August Retreat. On the same ECS site visit, the board chair was able to describe the school's current academic performance. ECS will be adding a new BOE member in January.

Organizational Capacity

The school's organizational chart is clear and accurately reflects school structure. The leadership team consists of the head of school, student support services director, two directors (K-5, 6-8), a director for student and support services, a curriculum instructional specialist, and an operations manager. There was a recent change in the Head of School position. It is currently filled with an Interim Head of School. The teaching staff has experienced turnover. During the 2013-2014 school year, of the thirty two teachers who began the school year, nine teachers left during the school year and five left at the end of the school year. Additionally, during the 2014-2015 school year, of the thirty four teachers who began the school year, seven left during the school year and five left at the end of the year.

Faithfulness to the Charter and Law

Mission and Key Design Elements

The current mission of Enterprise Charter School is to *"Engage young minds through projects and partnerships."* There is a materials change request of the mission statement to the following: *"We are leaders who push to succeed through partnerships, hard work, and a commitment to our future"*.

ECS lists the following Key design elements:

1. Authentic Differentiation: The school visits identified that authentic differentiation according to the Head of School is taking place. However, the team noted that differentiation including higher order questions and thinking skills did not occur on a regular and routine basis.
2. Athletics and Music: All students in Grades 3-8 are provided the opportunity to participate in instrumental and/or athletic programs.

3. Before and After School Extended Day: The Willie Hutch Jones, Big Brothers Big Sisters, Boy and Girl Scouts, Boys and Girls Clubs, and the Y all offer programs for students.
4. Common Planning: Focus Group Interviews identified that Common Planning time is used routinely.
5. Staff Development: Based on Teacher surveys and evidenced in the ECS calendar, PD is provided. Discussion of the leadership team follow-up occurred during the December 10, 2015 meeting.
6. RtI: As evidenced in Teacher schedules, RtI block occurs each day for Tier 2 and Tier 3 students.
7. Data Teams: As evidenced in Focus Group meetings, teachers meet to discuss student data and create Wildly Important Goals (WIGS) for students.
8. Field Trips: Occur on as needed curriculum basis.
9. 5 Specials: All K-8 students participate in special area classes as evidenced in Teacher schedules.
10. The Leader in Me: Opportunities for students to become leaders in their classrooms/school.
11. Looping Classrooms: Not seen by the BPS team –used only when needed.
12. Meals: AS evidenced by BPS visit
13. Monthly Family Fun Night: Occurs on a monthly basis. Parent sign in is required.
14. Reader and Writer’s Workshop: AS evidenced by Classroom visits.
15. Standards Based Report Cards: AS evidenced during Document Review.
16. Summer Enrichment
17. The Whole Child: Socio-Emotional needs of students met with partnerships (i.e. Gateway Longview).

Enrollment, Recruitment and Retention

During the term of the current charter, the school’s population of students with disabilities fell below the BPS district by 1% and 3% and the LEP population was below BPS by 1% and 3% respectively. Its’ percentage of economically disadvantaged students were above BPS by 22.8% and 22%.

In its application for charter renewal, the school states that it has made good faith efforts to attract and retain students with disabilities, English language learners and economically disadvantaged students. According to the 2016 Application for Charter Renewal, Enterprise Charter School implemented the following strategies:

- Staff regularly attends open houses at Head Start programs and community nights of other organizations
- Flyers are distributed in multiple languages
- Parents can receive admissions packets during Open House or during a tour of the school.

Legal Compliance

The school has adhered to all relevant laws, rules, and regulations. All issues related to Special Education and English as a New Language operate in compliance with local, state, and federal laws. Further, the school states it is compliant with Child Find, McKinney-Vento, the Dignity for All Students Act, and Family Educational Rights and Privacy Act. Board membership has been aligned with bylaw requirements throughout the charter term. A review of the ECS application found that the board of trustees' membership has remained stable for the entire term of the charter and that one new trustee will be added.¹ The number of board members complies with the board's bylaw.

¹ Source: December 10, 2015 meeting with school administration

WESTMINSTER COMMUNITY CHARTER SCHOOL

Teaching and Learning

Throughout the charter term, the Westminster Community Charter School (WCCS) has employed Reader's and Writer's Workshop as well Eureka Math Program (Eureka Math is founded on the ENGAGENY Math modules). It was noted during the September 28-29, 2015 Renewal visit that Buffalo Public Schools (BPS) staff evaluations found that questioning techniques for instruction was not high quality or rigorous. The BPS team brought this to the attention of the Leadership team. The Leadership team stated that professional development for teachers on higher order thinking skill questions would occur later in the school year.

Formative and summative assessments are purposefully administered at WCCS. Teachers review data, but student performance on state education tests have been inconsistent during the course of the current charter. The 2014-2015 data did demonstrate student achievement growth in ELA in all grades except 4, while in Math, students in grades 3, 5, 7, and 8 demonstrated growth, grade 4 remained stagnant, and grade 6 showed decline.

School leaders acknowledge that WCCS data does not meet or exceed overall state averages for ELA and Math. WCCS does demonstrate some of the sub-groups making progress towards the goals.

During this charter term, the school has begun to put systems and procedures in place to monitor the academic program with emphasis on using data. School leaders were able to discuss how data is collected and displayed on the data wall for teacher use. A technology specialist for the school provides teachers with data within 24-48 hours after students have been tested.

The goals and outcomes are listed below and include self-reported data from the 2016 Renewal Application.

Table 7: Progress Towards Goals
(Self-Reported by WCCS)

Evidence of Attainment of Academic Goals during Current Charter Term			
Academic goal	Measure used to evaluate progress toward attainment of goal	Progress toward attainment of goal	If not met or partially met, describe efforts to be undertaken to meet goal
Aggregate growth meets state average	Unadjusted Mean Growth Percentile (MGP) for all students on NYS assessments.	Combined: 54.5 ELA: 57.5 Math: 51	Exceeds state averages
Subgroup growth meets state average	Unadjusted Mean Growth Percentile (MGP) for all accountability subgroups.	Male:52.4 Female:56.1 Black:54.3 Economically Disadvantaged: 54.9 Students with Disabilities:55.8	Exceeds state averages
Performance Index - Aggregate growth to proficiency meets Effective Annual Measurable Objective Target	Performance Index (which accounts for the number of students who are proficient or those making growth sufficient to achieve proficiency within 3 years or by Grade 8).	ELA: 72 Math: 74	WCCS exceeds the state EMO in Math (74-72) and misses the target in ELA (72-76). The education plan in this application addresses the building's new emphasis on the state ELA modules that were buoyed by several weeks of summer staff development.
Performance Index - Subgroup growth to proficiency meets Effective Annual Measurable Objective Target.	Performance Index (which accounts for the number of students who are proficient or those making growth sufficient to achieve proficiency within 3 years or by Grade 8).	ELA Black:71 Economically Disadvantaged: 68 Students with Disabilities:28 Math Black:71 Economically Disadvantaged:69 Students with Disabilities:38	WCCS meets or exceeds targets for all subgroups in mathematics. Although gaps were closed between 2013-14 results as compared to 2014-15, WCCS does not meet the ELA targets. As indicated above, the education plan section of this application addresses the move to the state ELA modules and significant staff development this summer as an effort to ensure progress towards meeting the ELA goals.

Aggregate Proficiency meets state average	% of students proficient on 3-8 state assessments for all students	While WCCS does not meet the state averages in ELA (16.4-31.3) or math (17 – 38.1), the building did close the gap a bit by improving almost six points in ELA compared to less than one point by the state and almost 7 points in math compared to 2 points by the state.	The building will continue to provide staff training using the state mods, improving its extended day program, and using very creative and supportive new grouping strategies.
Subgroup Proficiency meets state average	% of students proficient on 3-8 state assessments for all accountable subgroups	WCCS students made a significant improvement comparing 2013-14 scores with 2014-15. Performance increased by 7% in mathematics and 6% in ELA. WCCS did not exceed state averages but closed the gap a bit when comparing with NYS as state scores stagnated in ELA in 2014-15 and increased by only 2% in mathematics.	WCCS will continue professional development in the state mod units and in even better utilizing data driven instruction to make better use of BOY and MOY benchmark assessments. Students will continue to experience various grouping practices to better focus on AIS.
Similar Schools Comparison shows statistically significant positive effect size	Effect Size in Comparative Regression Analysis controlling for prior academic performance (when possible) and student characteristics	Data not available by the deadline to submit the charter renewal application	Data not available by the deadline to submit the charter renewal application
District Comparison: exceeds the District average	% of students proficient on 3-8 state assessments	WCCS students who are proficient exceed district in both ELA (16.4 – 11.9) and math (17 – 15.1)	NA

<p>Subgroup Comparison exceeds the district average</p>	<p>% of students proficient on 3-8 state assessments</p>	<p>Females outperformed males on the ELA assessment (23% proficient to 10%). That trend exists statewide but there is a larger gap at WCCS. Three percent of students with disabilities were proficient as compared to 6% statewide. The building is now employing more strategic grouping practices for instruction and AIS supports and looks to narrow those gaps in 2015-16. Since almost all students are Black (95%) and economically disadvantaged in the building (90% free and reduced lunch), proficiency percentages in those subgroups matched the building results. There were no significant statistical differences for subgroups in mathematics. Females performed slightly better (19% to 15%) and results for Black and Economically Disadvantaged were very similar (15% for each). There was a larger gap for students with disabilities, only 3% proficient as compared to 11% statewide. The building is now employing more strategic grouping practices for instruction and AIS supports and looks to narrow those gaps in 2015-16.</p>	<p>WCCS will continue professional development in the state mod units and in even better utilizing data driven instruction to make better use of BOY and MOY benchmark assessments. Students will continue to experience various grouping practices to better focus on AIS.</p>
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State Accountability Designation is Good Standing	Reward, Good Standing, Local Assistance Plan, Focus or Priority School Status	Good Standing	NA
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Evidence of Attainment of Organizational Goals during Current Charter			
Organizational goal	Measure used to evaluate progress toward attainment of goal	Progress toward attainment of goal	If not met or partially met, describe efforts to be undertaken to meet goal
Acknowledging that parents are an integral part of the school community, WCCS will report that they are satisfied with WCCS based off of a parent survey	This survey will be administered yearly during the spring and results will be analyzed and measured over the summer; areas of concern will be addressed in the development of the school improvement plan.	Survey results were outstanding. More than 83% of the parents rated every survey question as Highly Effective/Effective. More than 80% of the parents also responded "yes" (a positive response) to the yes-no questions (See Section 1E on page 15 for more information on survey responses).	The lowest rated topics were related to discipline (still more than 80% approval) and communicating child's progress (67% said they were satisfied. The building is establishing this as an area in need of improvement.
To continue the cycle of improvement teachers will be granted access to high quality P.D.	This will be measured by teachers meeting the requirements to maintain their certification, as well as an internal survey	Significant strides have been made in this area. This summer three, 3-week summer institutes have been provided on 12 curr/instruction areas from NYS P.D. Standards	The school day has been extended for staff – one hour provided daily for PLC and weekly for grade level meetings

Culture, Climate and Family Engagement

The school fully recognizes the Common Core Learning Standards has enhanced testing rigor and that WCCS needs to continue making progress to meet or exceed SED average scores. The school has established a climate and culture that encourages student learning. The majority of classroom visits demonstrated clear and consistent evidence that classroom procedures and routines were in place.

The school environment appears physically and emotionally safe. The school employs a Positive Behavioral Intervention Support (PBIS) team that consists of 8-10 individuals with representation from Special Education, General Education, Special areas, Guidance, and related services in place to address the social, emotional, and health needs of its students. Through a partnership with Kaleida Health, a clinic is housed at the school employing a full time social worker and nurse.

The school distributes an annual handbook to each family. The information in the handbook includes: Code of Conduct, Discipline Policies, and in accordance with the Dignity for All Students Act - Anti-Harassment.

Organizational Soundness

Financial Condition

Westminster Community Charter School has a sound financial condition as evidenced in the school's financial statements. The school is determined to have a strong financial condition.

Overall Financial Outlook

Overall, the financial outlook for Westminster Community Charter School is positive and the charter school is fiscally sound. The composite score which is an overall measure of the financial health of the charter school calculated by the NYSED office of Audit Services for Westminster Community Charter School in 2014 was 1.8 and for 2013 was 1.8. The 2015 composite score calculated by the NYSED office of Audit Services has not been released. Based on a review of financial information from the year ended June 30, 2015 financial statements, data indicates the 2015 composite score will be comparable or higher than the 2014 composite score. Charter schools are measured on three financial ratios that are blended to produce a single composite score. The financial ratios used to calculate the composite score are the primary reserve ratio, equity ratio and net income ratio. A composite score between 1.5 and 3.0 is considered to be in strong financial health.

Near-Term Indicators

Near-term financial indicators are used to understand current and short-term financial performance and viability of the charter school. We used three near term financial ratios to calculate financial performance. The financial ratios include the current ratio, unrestricted days cash, and revenue variance enrollment.

The current ratio is a measure of operational efficiency and short-term health. For the years ending June 30, 2015 and 2014, the current ratio was 3.4 and 2.1. A current ratio over one is considered a healthy organization. The current ratio increase in 2015 is due to an increase in assets, specifically an \$810,102 contribution from M&T Charitable Foundation.

Unrestricted days cash is a measure of how many days a school can pay its expenses without another inflow of cash. For the years ending June 30, 2015 and 2014, the unrestricted days cash was 227 and 160. The unrestricted cash increase in 2015 is from an increase in cash of an \$810,102 contribution from M&T Charitable Foundation. Thirty or more days unrestricted cash on hand is considered low risk.

Enrollment stability indicates whether or not the school is meeting its enrollment projections and generating sufficient revenue to fund ongoing operations. For the years ending June 30, 2015 and 2014, the enrollment stability is 100% for both years, which shows the actual enrollment is meeting enrollment projections. Enrollment variances equal to or exceeding 95% is considered to meet the standard.

Overall, the near term financial indicators for Westminster Community Charter School indicate the school is fiscally sound and operating effectively. For the year ending June 30, 2015, net assets increased \$742,602 from \$9,243,015 to \$10,512,861. The increase in net assets is due to the M&T Charitable Foundation contribution of \$810,102 in 2015.

Long-Term Indicators

Long-term financial indicators are used to understand long-term financial performance and viability of the charter school.

The four financial ratios used to calculate long-term financial ratios include total margin, debt to asset ratio, cash flow, and debt service coverage ratio. The total margin measures the deficit or surplus of revenue to determine if a school is operating within its available resources. For the years ending June 30, 2015 and 2014, the total margin was 8% and 9%. A positive total margin is an indicator of low risk. Westminster Community Charter School's total margin increased significantly in 2015 to a positive percentage due to an increase in revenue from an M&T Charitable Foundation contribution of \$810,102.

Westminster Community Charter School does not have any bonded debt. However, they do maintain a long-term liability related to postemployment benefits for retiree healthcare in the amount of \$4,706,512 and \$3,883,653 at June 30, 2015 and 2014, respectively. The ratio of this long-term liability to total assets is 0.46 and 0.43 at June 30, 2015 and 2014, respectively.

Cash flow for the year ending June 30, 2015 increased \$1,613,172 from \$3,787,575 to \$5,400,747. The increase in cash flow in 2015 indicates the Charter School is operating efficiently. The increase in cash flow in 2015 is from an M&T Charitable Foundation contribution of \$810,102.

Debt service ratio is not applicable for the Westminster Community Charter School, as the school does not have any debt payments related to its postemployment benefit obligation.

Overall, Westminster Community Charter School is fiscally sound based on the long-term financial indicators.

Financial Management

The Westminster Community Charter School (WCCS) Board of Trustees is responsible for the financial oversight of the School. The President, Principal, Treasurer, and Fiscal Officer serve as the Finance Committee to monitor the school's finances and review all expenditures. Financial statements are prepared by the Fiscal Officer and are reviewed monthly by the Finance Committee. These financial reports are presented to and reviewed by the Board of Trustees at every monthly board meeting.

In partnership with the Board and the Principal, the Charter School's finances are

managed by M&T Bank personnel including the President, the Treasurer, and the Fiscal Officer under the M&T/WCCS Agreement. A certified public accountant is available, as needed, to provide accounting support to ensure that all finances are managed in accordance with generally accepted accounting principles (GAAP).

The Finance Committee develops an annual budget based on the school's financial history, specifications, and expectations. The Board of Trustees reviews the proposed budget and approves the budget by June 1 of the immediately preceding fiscal year. The Board also approves any amendments proposed during the year. The Board of Trustees compares year-to-date revenues and expenditures to the budget and reviews significant variations at monthly Board meetings.

Audited Financial Statements

An annual audit of the school's financial statements is conducted by an independent certified public accountant in accordance with Government Auditing Standards. The independent auditor's opinion for the years ending June 30, 2015 and 2014 is unqualified. Further, the audit for year-end June 30, 2015 and 2014, did not identify any deficiencies in internal control that would be considered to be a material weakness. The audited financial statements are included as part of the annual report to the charter entity and Board of Regents. For oversight purposes, the financial reports are also shared with the Buffalo Public Schools Finance Office.

Internal Controls

It should be noted that an internal audit risk assessment is not completed on an annual basis. It is recommended that an internal audit risk assessment be performed for Westminster Community Charter School periodically. This could potentially be completed by M&T Bank's internal audit department as part of their operating agreement with Westminster Community Charter School.

Westminster Community Charter School has a formal accounting policies and procedures manual that have been reviewed by the School's board as well as Buffalo Public Schools Finance Office.

Auditor Independence

Annually, an audit of the school's financial statements are conducted by an independent certified public accountant in accordance with Government Auditing Standards. For the fiscal years ending June 30, 2015 and 2014, the financial statements are in accordance with Government Accounting Standards.

Audit Guide

The financial statements audited by the independent auditor for fiscal years ending June 30, 2015 and 2014 adhere to the Charter School Audit Guide.

Board Oversight and Governance

The Westminster Community Charter School Board of Trustees (BOT) provides adequate stewardship and/or oversight of the school. The BOT maintains minutes and financial statements that are sent to BPS on a monthly basis. The BOT sends a survey to parents, staff members and students on a bi-annual basis regarding school culture and climate. The BOT reviews the results with the Principal.

According to Westminster's 2016 renewal application, five of the eight Board of Trustees (BOT) have served since 2004. One BOT member joined the Board in 2005 and two others joined in 2014. Board membership is maintained according to bylaws. The Board members who joined in 2014 had specific skills in either Special Education or Early Childhood as these areas were identified by the BOT as areas of need. The school leader is evaluated annually by the Board of Trustees.

The board evaluated its collective effectiveness, and there is evidence of board governance training or development over the course of the charter period. On the most recent Buffalo School site visit, board members were able to describe the school's current academic performance and progress. Further, BOT members described informal classroom visits and meetings with the Principal occur on a regular basis.

Organizational Capacity

The school's organizational chart is clear and accurately reflects school structure. The leadership team consists of the principal, one assistant principal, a dean of students, a special education coordinator, a curriculum and instruction coordinator consult, and four Math and ELA coaches. Westminster Community Charter School experienced a change in school leadership in January 2015. The current Principal has been an employee of the school for over seventeen years. Teacher turnover for the 2014-2015 school year demonstrated that four teachers out of fifty – six left during the school year and seven more teachers left at the end of the school year. Westminster Community Charter reports in the 2016 renewal application that the turnovers occurred as a result of resignations, position eliminations, and terminations. New teachers are onboarded with the following support: a full day orientation to the school, a meeting with the principal who provides clear direction on the school's vision and goals, a mentor is then assigned to the new teacher, and professional development provided by an Instructional Coach as well as veteran teachers is ongoing throughout the year.

Faithfulness to the Charter and Law

Mission and Key Design Elements

The mission of Westminster Community Charter School is to *"To challenge the status quo – to encourage people to think differently about their station in life. We do this through assuring that there are high levels of learning, by creating a safe and caring environment, and promoting community involvement in order to prepare students for a successful secondary experience."* While the school continues to meet its commitment to

meeting or exceeding State Academic averages, it has established a climate and culture that, for the most part, encourages student achievement in Math and Literacy with technology integration. A healthy lifestyle is encouraged at the school for all students.

During the course of this Renewal, key design elements have been implemented.

<ul style="list-style-type: none"> • Balanced Literacy: For the development of strong readers through the use of multiple literary texts as evidenced in classroom visits during the current Charter term.
<ul style="list-style-type: none"> • Extended learning day and summer enrichment program: Programs include a four week summer program focusing on Math and ELA and after school activities such as AmeriCorps Tutoring, Boys and Girls Club, and various clubs and sports as evidenced during the preliminary meeting discussion with the Principal.
<ul style="list-style-type: none"> • 1:1 iPad Initiative: All students in grades 3 through 8 have been provided with an iPad and a keyboard to develop technology skills and help prepare students for the work environment after WCCS. Students were observed using the iPads for multiple applications during classroom observations. Kindergarten through second grade students have a shared iPad cart that travels between the grades as evidenced during the Renewal visit on September 28-29 of 2015.
<ul style="list-style-type: none"> • Healthy Living: Emphasis on healthy living through physical fitness and nutrition which was supported by a federal PEP grant as evidenced by the Cafeteria manager food choices for students' lunches.

Enrollment, Recruitment and Retention

In the 2014-15, as well as 2015-16, the school's population of students with disabilities and students with limited English proficiency were below the Buffalo Public School district, while its percentage of economically disadvantaged students were above the district location (2014-15: +14.2%, 2015-16: +11%).

During the 2015 school visit for charter renewal, a school's BOT Focus Group member stated, "In the recruitment bulletins, both students with disabilities (SWD) and English as a New Language (ENLs) students are invited to come to our schools. We hired a director of special education to work with our inclusion teachers." According to the 2016 Application for Charter Renewal.

WCCS implemented the following strategies:

- Advertisements and notifications were created for the Buffalo Promise Neighborhood mailer and flyer (January-February, 2015) as well as placement of the notifications in community newspapers.
- Advertisements for applications for enrollment were placed in local community centers and churches.

- All printed materials, where applicable, (applications, flyers, website) and advertisements (newspapers, ads, posters) clearly indicate that enrollment is open without regard to ethnicity, national origin, gender, disability and or limited English proficiency.
- Open Houses are held at the school at the school.
- Flyers are distributed to neighborhood homes via direct mail.

Legal Compliance

Per the 2014 Charter Application, the school has adhered to all relevant laws, rules and regulations. An annual report has been submitted to the Buffalo Board of Education and the New York Department of Education on time during the charter term. All policies are reviewed with staff. All staff members receive written copies of the policies as evidenced by the Focus Group meeting with Leadership Team.

The board's attorney reviewed the school's discipline policy to assure that the policy includes disciplinary procedures for students with disabilities that address section 300.519-300.529 of the Code of Federal Regulations, as well as New York State Dignity for All Students Act regulations. The policies are found to be current and in compliance with applicable laws and regulations, and no recommendations for revisions were made.