



Iftin Charter School

Enlightenment through Academic rigor, Cultural literacy and Compassion

CHARTER PETITIONER'S RESPONSE TO SAN DIEGO UNIFIED SCHOOL DISTRICT STAFF REPORT AND WRITTEN FACTUAL FINDINGS IN SUPPORT OF DENIAL

This document provides petitioner's response to the San Diego Unified School District's (the "District") staff report and written factual findings adopted on February 4, 2020 (the "Staff Report") in support of its denial of the charter renewal petition for Iftin Charter School ("Iftin").

The District's findings are based on false, stale, or unsubstantiated allegations. By dredging up and focusing on old issues, the District no longer sees the forest for the trees. Iftin is a prime example of what the California Legislature intended to create by adopting the Charter Schools Act almost three decades ago, and why charter schools are vital to our public education system. Iftin was founded in 2005 by a group of parents and educators who needed an alternative to the traditional public school setting for the children in their community. Iftin is one of the few African American-founded and operated public charter schools in California serving a predominantly African American population who are among the most vulnerable pupils in the County and State. 86.9% of students at Iftin are African-American, 89.2% are socioeconomically disadvantaged, and 72.9% are English learners. We are unique and families travel from all over San Diego County by choice to attend Iftin because of that uniqueness. Iftin currently draws students from 22 different District-operated elementary schools and 10 District-operated middle schools. It would be extremely harmful to hundreds of families in the County if Iftin was forced to close.

As explained below, Iftin has explained or refuted each and every negative "finding" made by the District. We are more than happy to sit down and discuss any lingering issues with County staff, and we are willing to do whatever is necessary to keep the doors open on our small school.

District Finding 1: "Iftin presents an unsound educational program, pursuant to Education Code section 47605(b)(1), based on its failure to achieve a diverse student population at the school."

This finding is frustrating and should be a non-issue. Under the State Board of Education's ("State Board") charter review criteria, which the District cites to in the Staff Report, an "unsound educational program" is narrowly defined as one that will cause physical, educational, or psychological harm to pupils, one that will be of no educational benefit to the pupils who attend, or if the charter school has not met the renewal criteria or outcomes in the charter. None of these factors apply to Iftin.

In fact, the opposite is true. Iftin was founded 15 years ago to be a safe learning environment with high expectations for a vulnerable and historically underserved student population. Many of our families came to the United States looking for better opportunities for their young children to succeed, but what they found are traditional public schools without the necessary support and structures to serve their students' unique cultural needs. Iftin fills a void

for these families. We respect and celebrate the uniqueness of *all* our students and provide them with the education, confidence, and other tools they need to be successful in high school and beyond.

The District denied our charter renewal because our racial and ethnic balance does not match the demographics of the District or the neighborhood public schools. The District apparently thinks we serve too many African-American students and not enough Hispanic or Latino and white students. Charter schools are schools of choice and must admit all students who wish to attend, subject only to capacity. The only way to achieve a matched student population would be selective enrollment based on race or ethnicity, which is discrimination. The demographic makeup of our student population is determined by interest from families. Our families chose Iftin because our program is designed to help and serve *all* students: low achieving students, high achieving students, English learners, students with disabilities, students from all racial and ethnic backgrounds, and all others.

The Staff Report falsely states that Iftin reduced spending and overall efforts on marketing and outreach in 2018-19. Actually, the opposite is true. We recognize the value in a diverse student body so we have invested heavily in marketing and outreach at the District's request and tailored our recruitment plan to attract students from all walks of life. For example, we hired an Outreach Coordinator who is bilingual in English and Spanish who can converse with interested Spanish-speaking families and help translate marketing materials. This was an important and intentional component of our outreach plan and the costs are reflected in the renewal budget submitted to the District. We have also ramped up digital marketing and traditional print advertising, we use a translating service for all marketing materials, we've placed ads on MTS buses, we display enrollment banners in and around our facility, we run ads on KPBS, we regularly go door-to-door in the surrounding neighborhoods, and we advertise in local news publications in Vietnamese, Spanish, and other world languages. We are a grassroots organization and constantly have boots on the ground recruiting students from all backgrounds by flooding our communities with informational materials and in-person conversations.

District Finding 2: The District improperly found “Iftin is demonstrably unlikely to successfully implement the program, pursuant to Education Code section 47605(b)(2), as set forth in its charter based on a past history of operations that the authorizer regards as unsuccessful.”

Under the State Board's charter review criteria, whether a petitioner is “demonstrably unlikely to successfully implement the program” is about a charter operator's capacity to run a successful school: whether the operator has a history of charters that have been revoked, whether the operator is unfamiliar with the charter or charter law, whether the operator's financial and operational plan is realistically able to be implemented, and whether the operators have an adequate educational background. (5 C.C.R. § 11967.5.1(c).) The stale allegations cited in this section of the Staff Report have all been addressed and are no longer issues. As Iftin stands today, there is no doubt that we can continue successfully implementing the high quality educational program described in the charter, which we've already been doing for 15 years.

The Staff Report criticizes Iftin because we were “not in good standing” with the District during the 2016-17 and 2017-18 school years. We recognize and accept responsibility for the issues that occurred during those two difficult years, but they are in the past and have been

resolved. Iftin received confirmation from the District on June 25, 2019 that we are back in “good standing.” We believed this meant the District was satisfied with our solutions to the problems listed in the Staff Report and ready to work with us toward a productive future.

The Staff Report brings up alleged “complaints” from 2017 about failing to enroll two homeless students, a special education (“SPED”) student, and a foster student. These allegations by the District are false, which we explained to the District at-length years ago. The two homeless students *were* immediately enrolled and provided uniform vouchers for two free sets of uniforms each. The students attended Iftin for 88 days and then voluntarily decided to enroll in another school for personal reasons. The family of the deaf/hard of hearing student was a friend of the Iftin Principal at the time, and chose to enroll the child at another school voluntarily. The foster student was enrolled at Iftin during an early release day when school was already out of session. Rather than having the student start school the following Monday, the social worker voluntarily chose to enroll the student at Horace Mann Middle School, which is less than a block away from Iftin, to begin school that Friday. We are still in contact with these families, all of whom are willing to write a statement in support of how Iftin handled their unique situations. Importantly, even though we disagreed with the District’s description of events at the time and continue to disagree, Iftin nonetheless changed its uniform policy and enrollment practices in response, and we haven’t had any complaints since.

The Staff Report criticizes the high employee turnover rate during the same two school years under the previous administration. In 2018-19, Iftin brought on new leadership, which resulted in a complete program review, staffing changes, and development of school goals that truly address the needs of our students. Our strategies quickly yielded positive results—95% of the teaching staff who finished the 2018-19 school year returned for the 2019-20 school year. We have recently received calls from former staff members interested in coming back to Iftin because of our positive changes. We are confident that Iftin is back on track and poised to enter another successful five year renewal term.

The Staff Report criticizes the enrollment decline during the same two school years, but fails to recognize that our enrollment has remained steady ever since. As explained above, we are already investing heavily in marketing and outreach and ramping up our efforts to increase enrollment. And importantly, despite the momentary dip in enrollment, Iftin’s financial health remains incredibly strong. The District’s year-end fund balance requirement for charter schools it authorizes is the greater of \$50,000 or 3% of expenditures, which would amount to \$117,924 for Iftin based on its most recent board-approved budget. Iftin’s second interim financial report is showing a cash balance of \$1.8 million and a fund balance of \$1.95 million through January 31, 2020—far exceeding the District’s reserve requirement.

The Staff Report criticizes the previous administration’s handling of the afterschool program. We recognize there were issues, and we understand why the program needed to be closed in 2017. Going forward, we are committed to ensuring that every program at Iftin operates transparently and in compliance with all applicable laws.

The Staff Report criticizes certain payments made to consultants years ago under the previous administration. Iftin has since updated its fiscal policies and procedures, which now require that all payments to consultants are evidenced by written agreements and invoices. This issue has not come up again during the District’s recent oversight visits.

The Staff Report makes a huge deal out of clerical errors in Iftin’s Prop 39 application for facilities for the 2020-21 school year that have since been fixed. When the District alerted us to the clerical errors in our application, we quickly followed-up and clarified our in-District ADA projections. We have since accepted the District’s preliminary offer to remain in the same facility where Iftin has operated for 12 years. This is yet another non-issue.

The Staff Report resurrects old complaints about a perceived lack of forums for parental involvement. This criticism is disappointing because it could not be further from the truth. Our school was founded by parents and continues to be run by parents. From the moment you step foot on campus, the level of parental involvement is clear—the security guard who greets visitors at the door is a parent, our principal is a parent, several staff members are parents, and the majority of members of the Board are parents. Parents regularly attend Board meetings and speak directly to the Board during public comment. Our School Site Council is composed of the principal, teachers, staff, and parents/guardians or other community members as required by law, and meets regularly to develop the content of the School Plan for Student Achievement. Our Parent Committee is made up of parents only and meets regularly to discuss a variety of issues affecting the school, such as PowerSchool training, volunteer opportunities, and high school placement. The Parent Committee was part of the hiring committee for the principal position and recommends candidates for vacant Board positions. We also have an informal “parent breakfast” the last Friday of every month where we invite parents to come to the campus, meet with administrators, visit classrooms, and engage in an open dialogue. Our website may be a little outdated, but there is no legal requirement to post School Site Council or Parent Committee agendas online. We are nonetheless committed to ensuring all parents are aware of the various ways their voice can be heard at Iftin.

District Finding 3: The District improperly found “Iftin presents an unsound educational program, pursuant to Education Code section 47605(b)(1), based on its failure to maintain compliance with Special Education laws and regulations.”

This finding is based entirely on old allegations from the previous administration that have since been resolved. Iftin is committed to ensuring students with disabilities receive the necessary supports and services described in their IEP and required by law. Iftin has been in “good standing” with the District since June 25, 2019, and we recently took active steps to improve our SPED program even further by hiring a new Instructional Leader and an Education Specialist, in addition to our five paraeducators. Together, they have created a new, restructured Student Success Team to streamline the identification process any time teacher charted data, specialist observations, or informal assessments demonstrate a need for SPED services. We have contracted with different vendors to ensure a variety of SPED services are readily available at all times, even if it means spending more than we are allocated from the state and federal government for SPED programs. And despite any past issues, *our SPED program works* as evidenced by standardized assessment results. Based on 2019 CAASPP scores, students with disabilities at Iftin outperformed the top three resident schools (Mann Middle, Marshall Elementary, and Fay Elementary) in *both* ELA and Math.

The list of SELPA professional development opportunities in the Staff Report is misleading. Our staff members regularly participate in professional development opportunities through San Diego State University, the San Diego County Office of Education, and the District

on a variety of SPED topics, including PBIS and Accommodations and Modifications. Our Educational Specialist has attended all SELPA Steering Committee Meetings and the Annual Legal Forum this year. The Education Specialist and Instructional Leader recently attended the SELPA’s annual Inspiration to Action Symposium on February 20, 2020, and will attend four additional professional learning opportunities—two trainings (including CPI training) and two Steering Committee Meetings—for a total of 10 professional development events in 2019-20. Iftin also employs two instructional aides and three behavior intervention specialists, all of whom completed or are currently in the process of completing the SELPA’s online paraeducator web module training series comprised of eight different modules, including specific training on supporting students with autism.

We recognize that Iftin has a smaller SPED population than the District average and we are working to change that. However, Iftin largely serves a community that has historically been resistant to assessment and SPED services because of a perceived stigma. This has been difficult for us because the law requires parental consent before we can assess or provide services to a student. Iftin has been able to serve as a community leader in this respect recently, as families that previously revoked or denied consent are now reaching out to us to receive additional services for their children. We expect that as more families work with us and recognize the value of SPED services for their child, the number of students receiving services at Iftin will increase.

District Finding 4: The District improperly found “Iftin is demonstrably unlikely to successfully implement the program, pursuant to Education Code section 47605(b)(2), as set forth in its charter because it is unfamiliar with the contents of the charter renewal documents.”

In this section of the Staff Report, the District alleges that because sections of the Iftin renewal charter appear to be similar to another successful District-authorized school’s charter, the descriptions “may not accurately reflect Iftin.” This is false and not a valid reason to deny renewal. We are always looking for new and innovative ways to improve our program and better serve our students. This past year, we worked with an educational consultant familiar with key components of other programs in San Diego that serve large numbers of African-American students, socioeconomically disadvantaged students, and English learners. We did not randomly “copy and paste” from a charter that doesn’t reflect our program. Rather, we worked with our consultant and carefully and thoughtfully selected successful facets of their program that we believe will be successful for our own students at Iftin, and we inserted those descriptions into our renewal charter and intend to implement them during the renewal term. There is nothing wrong with trying to improve our program for the benefit of our students. We hoped this would draw praise from the District, not criticism.

District Finding 5: The District improperly found “Iftin is demonstrably unlikely to successfully implement the program, pursuant to Education Code section 47605(b)(2), as set forth in its charter because it has presented an unrealistic financial and operational plan.”

The Staff Report claims we cannot successfully implement our program because we do not have a realistic financial plan. This is false. Our budget and financial projections submitted with the charter are sound and based on 15 years of operating this school and serving this

community. Iftin's current fiscal condition is strong and we are projecting to improve our already healthy reserves over the renewal term. In fact, Iftin's second interim financial report is showing a cash balance of \$1.8 million and a fund balance of \$1.95 million through January 31, 2020. This is the result of years of being responsible stewards of the school's funds and shows that our financial plans are realistic and attainable.

The concerns in the Staff Report about our plans to increase enrollment are unfair. We understand that enrollment projections are critical for the budgeting and planning process for the school years ahead, and we worked with our back-office consultant, Charter School Management Corporation, to ensure our projections were sound and based on realistic growth. We recognize that our enrollment dipped during the 2016-17 and 2017-18 school years, but it has remained steady ever since. In fact, we actually increased enrollment over the course of this current school year by 40 students. We expect to see a big enrollment push this summer coming off the positive momentum of a successful charter renewal.

As for the budgeted operational expenses, the school has built its multi-year expenditures in a conservative manner to maintain a healthy financial budget. Given the schools healthy financial reserves, the school has set itself up to prepare for any instance where the budget needs to be revised based on needs of the students and operations of the school.

The retirement classification errors were simply typos in the budget, and are not a valid basis to deny charter renewal.

The Staff Report falsely claims our renewal budget does not contain substitute teacher costs. Substitutes are contracted through a vendor named Teachers on Reserve, so this amount is budgeted and expensed under object code 5810 for "Educational Consultants." We would have been happy to clarify this with the District but they never gave us the chance.

As described on page 132 of the charter, Iftin only contracts with responsible vendors possessing the ability to perform successfully under the terms and conditions of a proposed procurement, and in compliance with all conflict of interest laws. This description sufficiently meets legal requirements, but we would have been happy to add more detail if the District had requested. This has never been an issue in our three previous charter renewals.

The criticism about payments made to consultants years ago under the previous administration has been resolved. We intend to review our contracts with all consultants to ensure they're in compliance with our fiscal policies and procedures and all applicable legal requirements. We also intend to develop a high quality form consultant agreement we can use going forward.