

American Principles Academy

Application Summary Sheet

Information

Name of Proposed Charter School: American Principles Academy

Name of Applicant: Cedar Charter holders

Authorized Agent Karen Thelin

Location: Cedar City, Iron County

The school is not seeking a waiver.

The school is not seeking priority consideration.

Enrollment Plan

Year	K	1	2	3	4	5	6	7	8	9	10	11	12	Max
SY25	90	96	96	96	96	96	96	96	96					858
SY26	90	96	96	96	96	96	96	96	96					858
SY27	90	96	96	96	96	96	96	96	96					858

District Feedback

From the Superintendent,

“The Iron County School District wishes to acknowledge that we are aware of the **American Principles Academy** application to establish a charter school in our county.

We seek to provide a variety of education options for students and families. We have worked hard to develop and implement multiple education options within our organization. However, in spite of our efforts, we still find that some would like to have education options that currently do not exist in our school district.

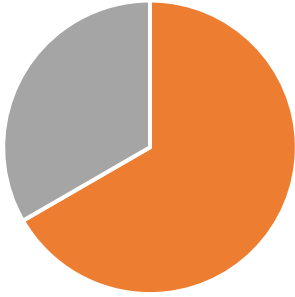
Charter schools, such as **American Principles Academy**, help to provide those options. Although we strive to meet the needs of every student and family, our collaboration with charter schools has been beneficial and we expect it will continue to be beneficial with **American Principles Academy** should their charter be authorized.

Please know that the Iron County School District has no opposition to the **American Principles Academy's** charter and we look forward to an open and collaborative relationship with them if the charter is successfully authorized.”

Report on Application

The application was read by three different groups. One group was SCSB staff members; one was USBE staff members; and one group was individuals from Utah’s charter community with an additional reader providing a national view.

Section	SCSB Rating	Reader Rating	USBE Rating
Executive Summary	Partially met	Partially Met	Partially Met
Exhibit A	Not Met	Partially Met	Partially Met
Program of Instruction	Not Met	Partially met	Not Met
Market Analysis	Partially Met	Not Met	Partially Met
Governance	Not Met	Not Met	Partially Met
Staffing	Partially Met	Partially Met	Partially Met
Business Plan	Partially Met	Not Met	TBD
Contracts	Not Met	Partially Met	TBD



Ratings

■ Met ■ Partially Met ■ Not Met ■ NA

Executive Summary

SCSB Rating	External Reader Rating	USBE Rating
Partially Met	Partially Met	Partially Met
Findings		
<ul style="list-style-type: none"> • The mission is more about the founders than the community. • There are questions about how much community input was actually received for this application. • The group uses the term classical education, but at least in this section it seems like they are using homeschool references. • There is a question of whether the argument for the school is “compelling” • 25 students is not small group instruction. • There doesn’t seem to be transparency about how American Preparatory Academy is involved. 	<ul style="list-style-type: none"> • There is a question of whether the argument for the school is “compelling” or “convincing.” • There is a concern about what the school will actually look like if it is achieving its mission. • The character education is vague. 	<ul style="list-style-type: none"> • Why cursive from kindergarten? • Is the classical model undermined when the school can’t complete the third phase of the trivium? • It appears that you’re starting with four classes in each grade. What is your plan if you don’t get that many students? • The application talks about homogenous student groupings (which only has an effect size of .30). Will heterogeneous student groupings be leveraged at all? • How do other “classical” models compare to what the

		<p>performance of schools in the region?</p> <ul style="list-style-type: none">• With the school's focus on ethics and morals, who is going to be deciding what is ethical and moral?• Homework in Elementary has an effect size of 0. Is there a better way to engage parents?• It is good to see a Para in each classroom. That is great support.• Why only have parent/teacher meetings once a year? Could these be more regular?• Is the Core Knowledge the same as the program by Amplify CKLA? The group should familiarize themselves with the ELA requirements in SB 127 before adopting a program.• What is the plan for 4-8 reading?• What is the reason for not using the state Math assessments?• There are concerns about the sources of information used to back up claims. They come from sources that are not peer reviewed and are faith-based.• Cursive in Kindergarten is not developmentally appropriate. The school should familiarize themselves with the Kindergarten standards.• Spelling should be taught during phonics instruction. Is there staff, time, and reason for separating them?• "small group" size is not 25 students. That is class size.
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		Small group size should not exceed 6 students.
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Exhibit A

SCSB Rating	External Reader Rating	USBE Rating
Not Met	Partially met	Partially Met
Observations		
<ul style="list-style-type: none"> • The provided justification isn't compelling for how the school will meet the purpose of charter schools. They included 5, but really should only focus on 1. • The mission specific goals and key elements aren't well aligned. • The academic goals are not rigorous. • The goals would be stronger if they used externally validated data. • The goals do not discuss the classical education model • The goals are focused on elementary but the school is K-8 	<ul style="list-style-type: none"> • There was a question about how well the three phases of the classical model really aligned with the grades and development of the students. • There was a question about whether the enrollment preferences would be legally permitted. • There is a concern that the goals were not strong enough. • There is also a concern about whether the other APA schools have ever been able to achieve the goal. 	<ul style="list-style-type: none"> • The written academic goals are not rigorous enough • There seems to be a disconnect between the key elements listed and the purpose of the school idea. • Target grade points seems like a problematic goal. It seems better to base it on student improvement or progress. • Mixed-ability groups have been shown to have a positive impact on student learning, is there a way this could be leveraged? • There is a concern about the use/role of formative assessments • There are concerns that this is just an APA satellite school •

Program of Instruction

SCSB Rating	External Reader Rating	USBE Rating
Not Met	Partially Met	Not Met
Observations		
<ul style="list-style-type: none"> • The applicant has a philosophy described, however, it appears to mostly be phrases taken from the Great Hearts America Charter Schools Website, as well as links to code, and it is unclear what the American Principles philosophy truly is. It would be beneficial to see them expound on these statements. 	<ul style="list-style-type: none"> • Generally, well written but lacking in any real plan for students with IEPs or ELL. • 25 students does not qualify as small group instruction. • There was a question about if there was sufficient clarity around the criteria for promotion from one level to the next. 	<ul style="list-style-type: none"> • How do you propose to fairly measure someone's character? • With a focus on character, morals, ethics, classical ed, visible learning, etc., what exactly is the focus of the school, and how do these pieces relate • How are you going to ensure that your literature programs meet the

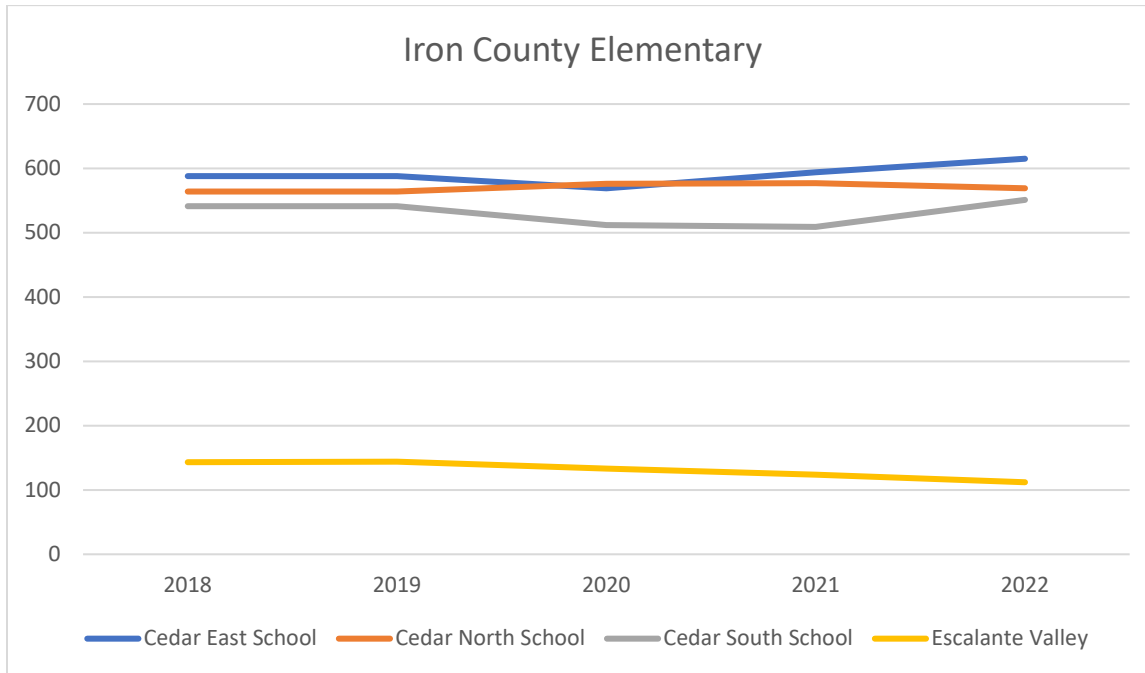
<ul style="list-style-type: none"> • A description of leveled learning in elementary is given. A list of curriculum is provided, and a very short explanation is given as to why these curricula have been chosen. It is unclear what sort of process will be in place if new curriculum is needed. The junior high appears to be operating off a different or altered mission statement. This should be included at the beginning of the application. • There is not a clear promotion structure from grade to grade. • Referenced research is from 1970 and 1982, which looked at “characteristics of effective schools”. This research is quite old, and the applicant may want to look at more current findings. The research to support curriculum choices was from 2009. • A method or rationale for how they will assess student outcomes is not provided. The applicant states that testing will be done in the junior high, but does not provide any specifics. 	<ul style="list-style-type: none"> • The plans for assessing students outcomes does not seem robust enough. • The curriculum materials for science, social studies and character development were not listed. • There is no plan for disadvantaged students • It is a question how the created math curriculum will be complete and coherent. 	<p>evidence-based requirements set forth in SB127?</p> <ul style="list-style-type: none"> • CHAMPS is a great program. Who is going to train your staff to implement it? • How can retention be replaced with MTSS or RTI since retention has a negative effect size? • There is a question for how the intended math programs support mathematical procedural fluency (accuracy, efficiency, and flexibility) often shortened to “math Facts.” • There does not appear to be a viable plan for how students with special needs, or multilingual learners will be served. • Only 1 special education teacher for 858 students is an unmanageable case load. • It is concerning that the is not a coherent educational program • There are 12 different literature programs included. How are you going to make sure they are aligned? • The Heggerty program listed for spelling is actually only for phonics, and not vocabulary. • The research shows that grammar is most effective when taught with writing, not separately. • The math program is a “recommended limited” curriculum, and “does not meet” the standards. • It is concerning that homeschool parents with little training or support are
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		being hired as Paraprofessionals.
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Market Analysis

SCSB Rating	External Reader Rating	USBE Rating
Partially Met	Not Met	Partially Met
Observations		
<ul style="list-style-type: none"> • Generally, pretty sparse and lacking detail and supporting evidence • Included data and letters are old and not about this school • Iron County is showing growth which is a positive indication • The rationale for the location is because of the founders 	<ul style="list-style-type: none"> • There is a question if the applicant has been specific enough in where they want to locate. • The market analysis seems to be conjecture • The local charters do have high enrollment • The application does not adequately explain what challenges exist when finding a location and how they will address them. • There is a difference of 720 students between those surveyed and projected enrollment • There is not sufficient evidence that the enrollment projections are realistic. • The plan to recruit students is limited. • There is not a strong case for why students will select this school over any other. • 	<ul style="list-style-type: none"> • There are questions that the enrollment projections are realistic for the proposed market. • There is an opportunity to better explain how the model fits the needs of the market. And there isn't a clear explanation for why the students will chose this school over others. • The recruitment plan does not seem strong enough to get the projected enrollment, especially considering that the target population is homeschool families. • It isn't helpful to include a letter from another school that is outside your area. • Is there not going to be overcrowding in the market in Cedar City? • The survey doesn't appear to be distributed enough to explain why the projected enrollment was set. • Some letters of support are for an APA satellite campus. • The marketing plan is weak due to a poor delineation of what board/staff members will be promoting the school.

Enrollment of Neighboring Schools



Governance

SCSB Rating	External Reader Rating	USB E Rating
Not met	Not Met	Partially met
Observations		
<ul style="list-style-type: none"> The board doesn't include any admin, law, school finance, or curriculum experience. There are a lot of promises here about what "will" happen, but nothing that is verifiable or demonstrable to the board's capacity to govern a school and represent the community well. 	<ul style="list-style-type: none"> The background sheets were included but didn't give a good sense about the qualifications or capacity to develop a school. There are questions about the board's plan for professional development Will the board's plan for meetings meet the vision, mission, and philosophy of the school? There is a concern that the Cedar Charter holders are waiting until after the receipt of the charter to become non-profit status. There is a concern about no term limits for board members 	<ul style="list-style-type: none"> The philosophy seems to just leave everything up to the ESP. There seems to be a diverse group of board members, but lacking capacity to oversee development of the school and management of public funds. There are concerns that there is a "pre-existing" organization. Having most of the administration handled by an ESP seems counterproductive to efficient management of the school.

	<ul style="list-style-type: none"> • There is a concern that there is no legal expertise on the board • There are concerns about the role of the board, and the interactions/ accountability with Leadership and ESP. • There is a concern about the board capacity to manage public funds and be compliant with legal obligations • There are concerns that the governing board can represent the whole community. • There is a concern that there are too few board members to provide sufficient governance 	
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Staffing

SCSB Rating	External Reader Rating	USBE Rating
Partially Met	Partially Met	Partially Met
Observations		
<ul style="list-style-type: none"> • If the board has outsourced all leadership to a contractor, who/how will they hold anyone accountable? • There seems to be a lot of administrator positions for a school of this size. • The budget talks about nursing staff, but it isn't described here. • The staffing plan assumes that parents who homeschool will want to work for them. But there isn't much evidence of that. • The policies only say they will meet the law, and it seems to leave a lot up to interpretation. 	<ul style="list-style-type: none"> • Is there a reason why there is no SpEd Director listed? Or an Assistant Principal? • The special education staffing is inadequate. • The application does not address the school's position on the employment of relatives. • It is concerning that the roles and responsibilities of the administration are not clearly defined. • The staffing plan does not appear to adequately meet the needs of the school 	<ul style="list-style-type: none"> • Not additional comments given

Business and Operations Plan

SCSB Rating	External Reader Rating	USBE Rating
Partially met	Not Met	Partially Met
Observations		
<ul style="list-style-type: none"> • The school intends to hire a management company, but they don't appear to understand that they are responsible for financial management. • The business plan was partially met. • The facilities were partially met. The Vivint facility says it is available in 2024. What if it isn't available? What is the plan. • The budget in the start-up grant is more than 250k (pg. 31). The first year you can only get a max of 200k. • In the start-up grant, the annual amount for the salary actually equals 60k, not 50k. Can you explain where the 10k difference is coming from? • It doesn't make sense why you would eliminate entire classes if there is an enrollment shortfall. What happens if the enrollment is spread across multiple grades? 	<ul style="list-style-type: none"> • The budget was only for the planning year. • Why is 20% of the revenue earmarked for savings? • The financial priorities only partially align to the key elements. • There is a question if the reserve funds will be sufficient to meet the required minimum. • There are questions about why the ESP is being tasked with monitoring the finances. • The plan for the facilities does not fit within the budget. Will the facilities be able to meet E-Occupancy? • The explanation for the school's plan to self-evaluate its performance is not sufficient. • The expenditure assumptions for the first few years are not realistic or evidence-based. • There is a limited understanding of the options for facilities and financing. • The strategies for meeting potential budget and cash flow challenges seemed partially viable. • There were questions about the organization's commitment to maintaining financial viability of the school. • The implication is that American Preparatory Academy has already been determined to be the provider. 	<ul style="list-style-type: none"> • The application assumes that the educational management company will take care of the financial responsibilities, but at the end of the day, the charter is responsible. The financial plan is weak because of this assumption. • The school estimates average total funding per student at about \$8,300. This can be accomplished if students qualify for sufficient add-on funding. However unrestricted state funds for students will range from \$6,500-\$7,000. • The application is overly optimistic in its revenue estimates which does not seem to align with projected enrollment • There is not sufficient detail for how the school would effectively meet cash flow issues.

	<ul style="list-style-type: none"> • There is no pre-opening timeline, and the pre-opening plan lacks specificity. • One concern is that pg. 37 begins discussing expeditionary learning, but that hasn't been included before. 	
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Contracts

SCSB Rating	External Reader Rating	USBE Rating
Not Met	Partially Met	Partially Met
Observations		
<ul style="list-style-type: none"> • This section is concerning that all of the ops and management are outsourced, which means the school could be entirely different from what is written here. • 	<ul style="list-style-type: none"> • There is no clear distinction between American Principles Academy and American Preparatory Academy. 	<ul style="list-style-type: none"> • What is the connection to APA?

Board Member Verification

Karen Thelin

- No known criminal concerns. Nursing license was initially denied (could indicate a complaint in another state or criminal charge not disclosed, but appears the denial was superseded and she now has an active license.) Background in Nursing. Was APA district nurse. See this 2021 article: <https://www.sltrib.com/news/2021/10/15/more-utahns-die-covid/>
- Previous lawsuits: The Thelin's sued NuTone company in 2013: https://www.govinfo.gov/content/pkg/USCOURTS-utd-2_11-cv-01046/pdf/USCOURTS-utd-2_11-cv-01046-0.pdf
- On 5/22, registered 'Cedar Charter Holders' with husband James Thelin and fellow board member Kami Merrell. It's the nonprofit that's applying for the school.
- Has a social media presence, not very active and nothing to note. Will her educational support business be contracted with APA? How is her husband involved?

Scott Herrick

- No known criminal concerns or lawsuits.
- States he is currently a 'religious educator', but his LinkedIn says he's an APA teacher. Could be seminary teacher there.
- No known lawsuits and not much of a social media presence.

Kami Merrell

- No criminal background found, affiliated with “Moms for America” which is an organization that sponsored the January 6th event at the US Capital, the founders participated in the insurrection. Friends with Sharette family online, as seen on her on Facebook.

Kelly Hofeling

- No known criminal concerns or lawsuits. Experience in NPO is “I have been a member of a nonprofit organization in Cedar City that is aimed towards helping mothers and families in Iron County.” But fails to mention the organization. Could indicate a lack of transparency? Facebook privacy settings are locked down. Home school advocate and not much else. Maiden name is Christensen. Husband works as a business manager in treatment center industry at NPO called “Havenwood Academy”.

Matt Howard

- No known criminal concerns or lawsuits. Worked with Anaszai Foundation, an outdoor “troubled youth” NPO in AZ, and other treatment centers. No criminal concerns or lawsuits. Does not have a Facebook/social media presence. Owns business named, “Quiet Zion”, rents out a part of property on hipcamp.com

Casey Anderson

- No known criminal concerns (outside of traffic-related) or lawsuits. Was appointed to the Senate in 2011 and lost race in 2012. Says he serves with a local NPO but omits the name – lack of transparency? What is the NPO? Social worker, Utahns Against Common Core members wanted him to be elected in 2012. Does not have a Facebook/social media presence. Did have a consulting business at some point.

Additional Appendices

Appendix B lacks sufficient information to give an understanding of what the group is allowed to do.

Appendix C: The board members have no term limits. And only having 3 board members creates problems as far as voting goes.

The bylaws only require the board to meet quarterly. That isn't often enough to really understand what is going on within the school.

In the bylaws it speaks of a business manager, yet this is something that in the narrative is included in the ESP. This adds to the confusion about who is responsible to whom.

In Appendix D: there is no concerns.

Appendix E. No applicable because there are no waiver requests.

Appendix F is marked as not applicable. But in examining the contracts section it seems that there should be additional information here.

Appendix G. See the comments in the section for the Business and Operations Plan. There are questions about how certain figures were calculated.