

Elevated Charter School Application Review

Application Summary Sheet

Information

Name of Proposed Charter School: Elevated Charter School

Name of Applicant: Amy Edwards

Authorized Agent: Amy Edwards

Location: Statewide, virtual school with an administrative office in Springville, UT.

This school is not seeking a waiver

This school is not seeking priority consideration

Enrollment Plan

Year	K	1	2	3	4	5	6	7	8	9	10	11	12	Max
SY25	50	50	50	40	40	40	30							300
SY26	50	60	60	60	50	50	50	40	30					450
SY27	50	60	70	70	70	60	60	60	50	35	25	20	20	650
SY28	50	60	65	75	75	80	70	70	70	50	40	25	20	750
SY29	50	60	75	75	85	85	85	75	75	75	70	45	45	900

District Feedback

Since this is a statewide school, feedback was solicited from all districts within the state.

Staff received feedback from 10 districts that stated they did not receive the application for the applicant group

Logan

The experiences of the last two years have illustrated that virtual only instruction is a viable option for a very small number of students. Although the proposal for Elevated Charter School describes a "virtual classroom" environment that blends assessment, instruction, and hands-on learning activities, there are multiple issues the school's design does not adequately address. They include:

- Fully virtual instruction, with licensed teachers, is currently available through Utah Online School, making Elevated Charter School a redundant service.
- The online structure is primarily successful with students who have an adult present with them to monitor activity and encourage engagement (particularly if the student is receiving supplemental services such as reading intervention or services provided on an Individualized Education Plan). This is particularly relevant in the primary grades.
- Because the success of this model is dependent on parents being present (or readily accessible during instruction) it only serves the needs of students whose caregivers are able to be present during instruction, something which an increasing number of our families in Utah are unable to do because of economic stressors.

- The data on early literacy development suggests that virtual instruction has limited impact. Having a virtual-only approach to reading instruction raises concerns.

In short, I am concerned that the instructional framework described by the proponents of Elevated Charter School is not based on relevant, accurate data related to student learning. Although I am sure there are many parents who would be eager to try this structure, I worry that its impact will not be what is desired.

Sevier, South San Pete, North San Pete

Charter and online charter schools have a unique impact on rural schools, generally the impact is negative because of economy of scale issues. Our resources are limited, for example, if we lose even one single teacher for loss of enrollment, that almost always means that we lose an educational program. Our desire is to provide a system where all of our local students will participate within our flexible and adaptive programs. The State Online Education Program (SOEP/SEATS), while not ideal, is a reasonable solution for us as it provides choice and allows us to keep students enrolled and fully participating. We feel strongly that there are already more than enough online charter options in the state to allow for choice and we question the ability of online charter schools in providing adequate educational opportunities to rural students. We also believe that face-to-face instruction is the most likely path to success for students. Thank you for providing us the opportunity to respond.

Morgan County (Same feedback as PEAK Academy)

We do not stand in any opposition to the application.

Iron County (Same feedback as American Principles Academy)

The Iron County School District wishes to acknowledge that we are aware of the Elevated Charter School 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 Elevated Charter School, 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 Elevated Charter School should their charter be authorized.

Please know that the Iron County School District has no opposition to Elevated Charter School'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. In past years there was a degree of consistency between the reader groups. However, this was not the case this year for this application. There was consensus on the Governance portion of the application, but the Program of Instruction, Market Analysis, and Business and Operations Plan sections had diverse opinions.

On the Program of Instruction readers noticed an improvement from last year's application but still did not feel the program meets the requirements for public education. The primary concerns in the program of instruction were focused on access. Not only were there lingering questions about how special education will work, but readers questioned the feasibility and reliability of shipping materials. If there are delays in postal service how can we guarantee that students will all be given the same opportunities to participate. In addition to shipped materials there are still concerns about statewide access to the internet. Portions of the state do not have reliable internet connectivity. The solutions for this have been far costlier than the budget in this application suggests. While readers valued the synchronous lesson there were questions of exactly how student attendance would be tracked.

The Market Analysis raises serious concerns that the school would survive. While online enrollment increased over the last few years, this is largely thanks to the pandemic. At charter and district online schools enrollment has dropped and in many cases has decreased even lower than pre-pandemic levels. For example, a school with a similar model to that proposed in the application lost nearly 90% of its student population in one year. Another online school that opened this year projected enrollment above 1000 students, but only enrolled 66. This ultimately led to the school having to payback millions of dollars in funding.

For the Business and Finances, the readers typically felt that the proposed budgets were not realistic and that while an online school avoids some of the costs associated with buildings and facilities, there are nonetheless real needs that were not included. In addition, the application indicates that the school intended to use of Education Service Providers but there were concerns about the lack of information around how these entities would be identified, vetted, etc. Poor vetting could potentially lead to additional concerns about student safety.

The following sections outline the comments and notes from the three reader groups. The overall section rating is included but should not be construed to be a recommendation of "pass" or "fail." Met, Partially Met, and Not Met indicate the closest that the readers got to a consensus on each individual metric within a section.

Executive Summary

SCSB Rating	External Reader Rating	USBE Rating
Partially Met	Partially Met	Met
Observations		
<ul style="list-style-type: none"> • The motto is catchy, but there is a lot of jargon throughout that detracts more than it adds • Life Elevated is never really clarified. • While the board identified that the school exists online, it doesn't speak about the educational foundation it wishes to establish. • There are questions about how impactful this proposal is so many years after the pandemic. • This is more streamlined than last year. • This is not innovative and may not be a school that is needed. 	<ul style="list-style-type: none"> • There isn't a "compelling" argument for why this school is needed. • Liked seeing synchronous instruction. • Having fluid grade enrollments is allowed, but it seems like this would be difficult to plan for and to provide correct staffing. 	<ul style="list-style-type: none"> • It is smart to build into future grades. • There were concerns because of lack of description around K-6 educators and licensing. • National and state data indicates that online instruction doesn't boost outcomes in lower grades, would it not be better to consider just doing a secondary school?

Exhibit A

SCSB Rating	External Reader Rating	USBE Rating
Met	Met	Partially Met
Observations		
<ul style="list-style-type: none"> • Mostly a compelling explanation for how the school would meet the purposes of charter school • The enrollment preferences do not seem to meet the legal requirements • Generally this section is good, but lacks direction. • The mission specific goals are focused on teachers and not students • There seem to be too many things the school is focusing on. But the reasons they include do seem compelling. • The group can be more clear how there will be accountability in testing. For example if they are counting standardized test, the school-wide test, or the portfolio, who decides that? It needs to be clear for all stakeholders 	<ul style="list-style-type: none"> • The goals aren't very specific, and despite having a focus on hands-on learning there isn't a goal about that. • It is confusing to try and figure out exactly what role the portfolios have, and how they will be utilized and there wasn't a clear standardized measure for evaluation. 	<ul style="list-style-type: none"> • Key Elements seemed to match the general purpose of the school. • The application seems very teacher centric, and perhaps there is an opportunity to build a more robust collaborative PLC group. • What will the "virtual classroom experience" be like? • Professional learning plan for teachers sounds like an intriguing idea. Will teachers have access to coaches? Will that be enough to help teachers be successful? • The idea of an education coordinator sticking with a family is great. • What will collaboration look like when teachers are so heavily focused on a single content area? • Where are you getting your teachers who will be trained to teach virtually? What program did they use? What is your plan for addressing turnover? • How are you going to ensure that all students will have access? For example, students in San Juan, will there be tech support? • How will kindergarten students be able to engage in this model without constant adult supervision and scaffolding? • Teachers are not trained in curriculum design, and the plan to have teachers and students create curriculum

		will not meet the requirements set forth in SB 127 for literacy instruction.
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Program of Instruction

SCSB Rating	External Reader Rating	USBE Rating
Partially Met	Partially Met	Not Met (plus)
Observations		
<ul style="list-style-type: none"> • They discuss visible learning as well as collaborative teaching and learning. The philosophies complement each other. • It is easy to understand what the school day would be like for students. • It isn't clear how this school will be different from other schools that already exist in Utah. • We've seen a lot of growth from the application last year. • The method for assessing students is more clear in this section. • The group has included some additional resources that could be provided for students with IEP and 504 plans. 	<ul style="list-style-type: none"> • The instruction and mission of the school are well aligned. • There were questions about how SPED students would exactly be served. • It seems like some special education services are going to be contracted out. Is that correct? • It isn't clear what the criteria for promotion or graduation will be. Additionally it isn't clear exactly how the High School will work. • K-3 literacy and math instruction doesn't align with the requirements. • The evidence presented for the method of instruction does not seem very strong. • The current application doesn't have a clear plan for tracking student attendance. And if student persistence and effort are going to be measured there needs to be clear and accessible rubrics for how they are measured. 	<ul style="list-style-type: none"> • Will shipping materials to students really be a sustainable practice? Who will be in charge of gathering and mailing all of these supplies? • The student online safety was good. What is the plan for bringing the parents up to speed? • How involved are the teachers on the 30 day conferences run by the Education Coordinators? • How are other subjects being taught besides ELA, Math, Science, and Social Studies? • There is a good understanding of the state's testing ethics policy. • Science does not seem to be adequately addressed. How will this content be delivered? • It isn't clear how teachers will have time to create both synchronous and asynchronous instruction for all students that is also individualized (pg. 18). And the Visible Learning is strategies for teaching, but isn't a curriculum. • The sample schedules provided don't seem to provide enough time for all content areas? • How will mathematics instruction align with USBE's Promising Practices in K-12 framework for Mathematics Software? For example (pg. 23) lists 60 minutes of math

		<p>instruction for 3rd grade, but the state recommends 90 min.</p> <ul style="list-style-type: none">• The plan for assessments is similar to what other online schools have proposed, but this has been problematic and less effective.• The description provided for ELA 4-5 doesn't include accurate writing types for UT standards.• There is not a lot of evidence that the additional programs included (eg. MobyMax) have strong impacts on students learning. How will these be aligned to the instruction provided by teachers? Furthermore, the programs listed to support students with disabilities and multilingual learners are not certified to be the best supports for students, nor are they considered interventions.
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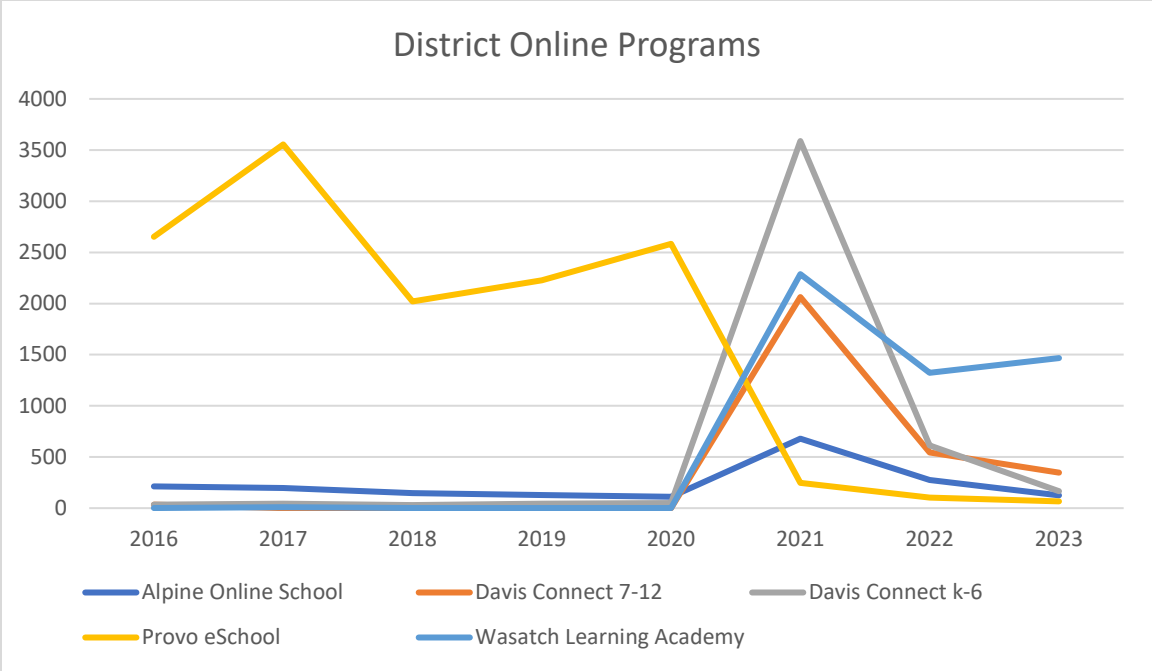
Market Analysis

SCSB Rating	External Reader Rating	USBE Rating
Not Met	Partially Met	Partially Met (minus)
Compliments and Observations		
<ul style="list-style-type: none"> • Online enrollment is down across the state. A new charter online school opened this year with very low enrollment • The districts' online programs were not even mentioned. • There is an assumption that parents like certain elements of the proposed school, but that doesn't translate directly to enrollment. 	<ul style="list-style-type: none"> • Leadership Academy also offers synchronous classes. So there is already a provider offering something similar. • The market analysis was done with an outside vendor to conduct the market analysis. This didn't seem productive because there is very little data to support any of the statements. • It is great that the school plans on serving all students, but it still doesn't seem like there is a good plan for how that will be done. • The state is getting rid of other online service providers because they haven't been getting what they were contracted for. How will this be any different? 	<ul style="list-style-type: none"> • The case for the school model is unique, but there isn't a strong case that the market needs another school like it. • The comparison to other online schools is concerning because of the added supports due to poor outcomes.

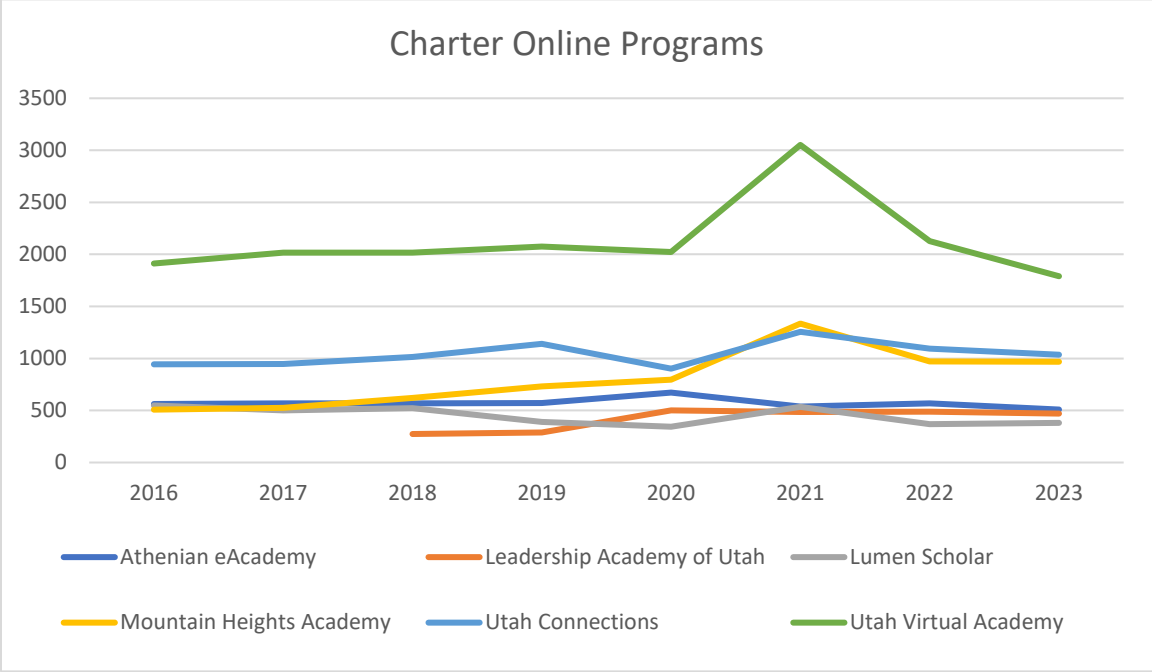
Enrollment of Similar Schools

The graphs below show the online enrollment across the state. The date along the X-Axis corresponds with the Oct. 1 count day. Because of the number of existing online programs and the variations in their enrollment we have created 4 different graphs rather than including all the comparable schools in one graph. There were also a number of schools where the enrollment data was easier to understand in a table format. This was done so that it is easier to see differences.

The first graph is for districts and district sponsored schools. In this graph you can clearly see that the pandemic led to tremendous growth in online enrollment during the 2021 school year. However, since 2021 these programs have all seen significant decreases in enrollment. Two of the schools appear to have 0 enrollment between 2016 and 2020, but that is not the case. Each of these programs had enrolment in the single digits during those years.

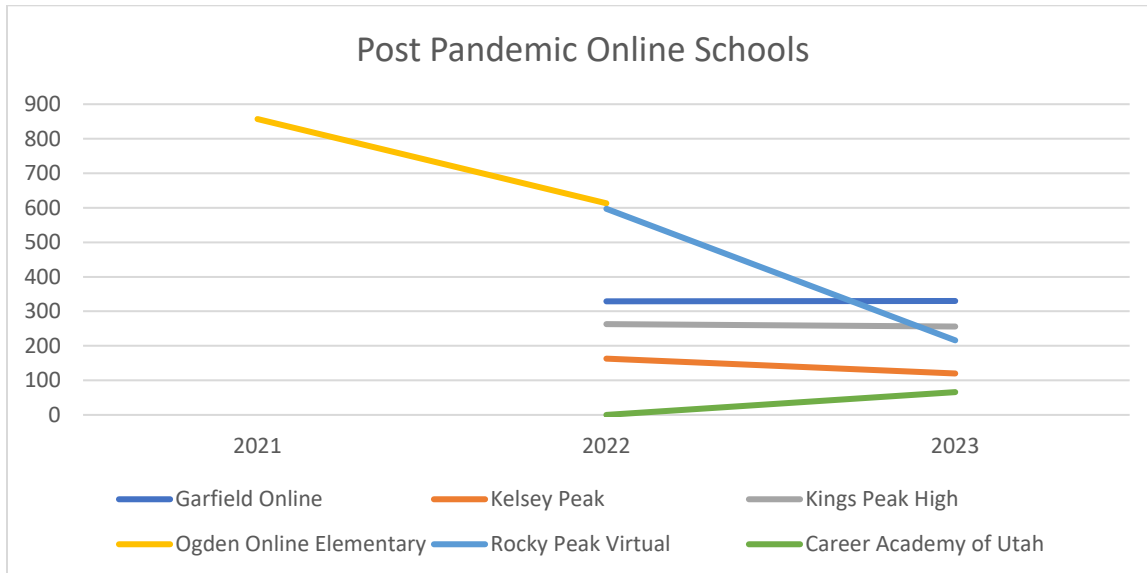


The second table shows enrollment over time for online charter schools. In this graph you can see again that the pandemic led to significant growth. However, since then the pandemic enrollments at each of these programs have decreased. Career Academy of Utah is a charter school, but it is not included in this table. It is included in the next table because it opened since the pandemic and the scale of the graph would render the information unusable.

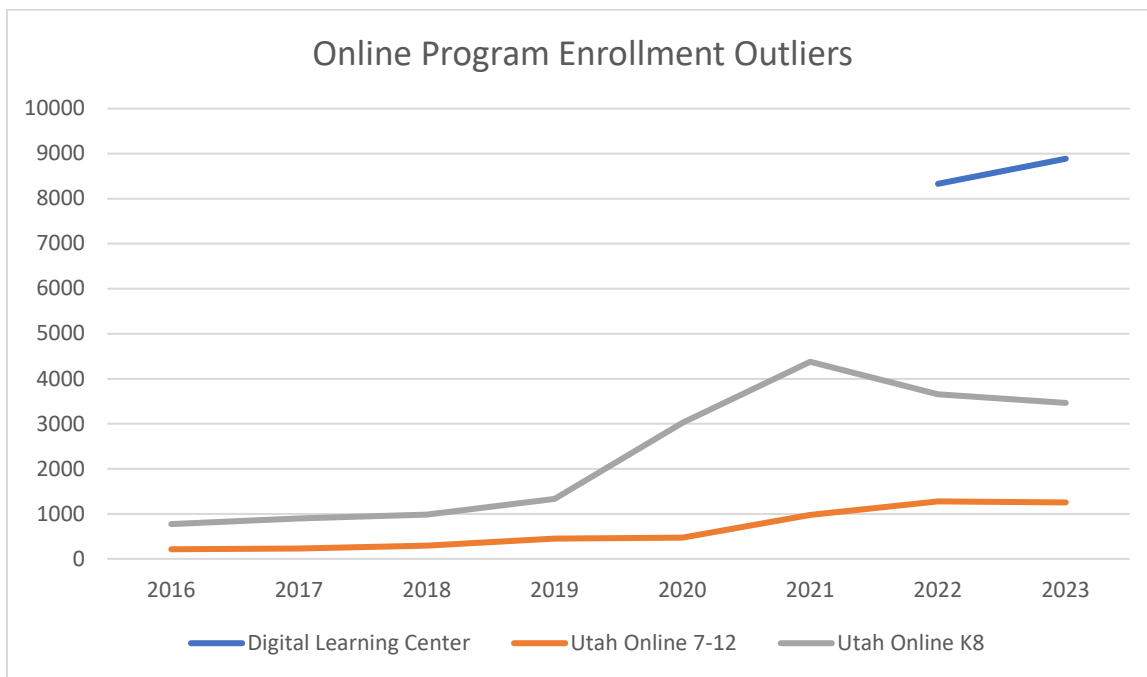


The third graph shows online programs that have opened since the pandemic. It is almost imperceptible on the table, but just one program saw growth, and that is because they only increased by 1 student. The rest of these programs are opening their second year with lower

enrollment than their first year. One of the programs has most likely closed because they did not have any enrollment data entered for SY23.



There are online program that were so different from the others that it wouldn't have been meaningful to include them in the same graphs. One of these programs, The Digital Education Center did see an increase in enrollment of 557 students.



East Shore Learning only ever had enrollment data for SY16, and they enrolled 22 students.

Nebo Online School opened in SY23 with 1741 students.

Three schools, South Sanpete Education Support, Uintah Online School, and Weber Online K-6 where their enrollment was so different from the other schools that it wouldn't have been meaningful to include them in the tables.

School Name	SY16	SY17	SY18	SY19	SY20	SY21	SY22	SY23
South Sanpete	5	32	27	26	14	4	3	1
Uintah Online	30	36	19	23	21	607	81	56
Weber Online	5	4	7	6	7	20	147	65

Governance

SCSB Rating	External Reader Rating	USBE Rating
Met	Met	Met
Compliments and Observations		
<ul style="list-style-type: none"> • They could benefit from additional training on their legal obligations in Utah. • There is no mention of how the board has the capacity to represent the community. • There isn't a plan for any training or professional development, or processes for how they will self evaluate. • There isn't a clear plan for how board members will be added, and no term limits. 	<ul style="list-style-type: none"> • The board does seem to have a framework and understanding for how to run an online school. • Having 3-5 board members would not lead to good governance. How are you going to provide adequate oversight? 	<ul style="list-style-type: none"> • The governing board appears to have capacity to govern the school. • The process and frequency for board evaluations could be better defined. • The plan for board professional development lacks specificity

Staffing

SCSB Rating	External Reader Rating	USBE Rating
Partially Met	Partially Met	Partially Met
Observations		
<ul style="list-style-type: none"> • It is concerning that SpEd teachers are a 2nd year budget item. • It isn't clear how the additional pay for teaching live classes is determined. • The SpEd case load has the potential to be problematic. • They propose a third party for business management, and for HR, but don't have a clear process in place. 	<ul style="list-style-type: none"> • There wasn't a convincing argument that the school has a sound understanding of the staffing needs that would be required to pull off the school. • How many teachers are going to be needed for each grade? • What will the teacher/student ratio be? • There really needs to be more special education supports the first year. The caseload for SpEd instructors would be unbearable. • There are concerns that there will be greater data entry and registrar needs than what is allocated in the budget. 	<ul style="list-style-type: none"> • It is good to have such high expectations for staff. • There appears to be lowered expectations for SPED teachers compared to GenEd. • Instructional coaches were discussed elsewhere, but not as clear here. • It is concerning that special education teachers aren't being brought on until the 2nd year. • The salaries posted in the application don't seem realistic with the market. • What is your plan for hiring qualified people considering the teacher shortage?

Business and Operations Plan

SCSB Rating	External Reader Rating	USBE Rating
Partially Met	Partially Met	Partially Met
Observations		
<ul style="list-style-type: none"> • The start-up and implementation grant is not filled out correctly. • There are some enrollment discrepancies with year 3. • The advertising budget is only \$2000, which seems really low. • There don't seem to be enough staff members during the first year of operations • There are discrepancies between the salaries listed in the narrative and the budget. 	<ul style="list-style-type: none"> • Where are all the servers going to be housed? This is a big • Where did the Triple A Bond come from? That seems unlikely. • Additional information is needed for where the loan is coming from, and why they think they would qualify for such great interest rates. • The board does seem to be committed to financial viability, but the plan seems too optimistic for the current market. • There could be better descriptions for how funds will be managed. • There will most likely be greater facility needs than the school anticipates, even for an online school. • What is the school's plan for getting technology to students when the computer shortage continues? • What is the backup plan when mail services are unreliable or delayed? How will students participate? • How is marketing going to work? Simply starting a website is not going to get the type of enrollment without intentionality. • There is a closure plan. There is a question of whether it will be enough to support teachers and families if the time comes. • This school is going to cost far more than the team anticipates. Salaries are 	<ul style="list-style-type: none"> • There are concerns about the revenue projections and budget associated with this charter. • The budgeted reserves are only around 6%. The application did not go into sufficient detail on how the school would meet cash flow problems. • The estimated revenues per student are around \$7,300 which is maybe too high given a sizable portion of their enrollment will be kindergarteners. • It is noteworthy that the application stated they would not rely on fundraising for operational expenses. • There are questions about if the school would actually have the controls or processes in place to effectively address any financial challenges.

	<p>significantly under valued, and some positions even appear to be volunteers</p> <ul style="list-style-type: none"> • The BM fee is lower than what is typically available. • The treasurer seems to have a role that can't be sustained. And there isn't a lot of clarity around what services are going to be paid for and what is expected to be done on a volunteer basis. • IT supports and infrastructure is a significant concern, and there isn't a convincing plan for how to solve internet access to students throughout the state. • Each community does not have the same access to gyms, dance studios etc. There are also background checks and occupancy requirements. 	
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Contracts

SCSB Rating	External Reader Rating	USBE Rating
Partially Met	Not Applicable	TBD
Compliments and Observations		
<ul style="list-style-type: none"> • This section is lacking in detail. • There is a question of “adequate enrollment” if the threshold isn't met, what is the alternative? If there is a threshold that needs to be met, then this is really should be a location-specific model. It wouldn't be statewide then. • What metrics are being used to evaluate the education service providers? 	<ul style="list-style-type: none"> • There are concerns that the ESP and SPED services are already contracted or that arrangements have already been made. 	<ul style="list-style-type: none"> •

Board Member Verification

For each of the proposed governing board members SCSB staff conducted internet searches to verify that the information shared in the background sheets was accurate. In certain cases these searches yielded additional information which could impact the school.

These findings are additional, or corrections from the findings from when the school applied the first time.

Amy Edwards

- No known lawsuits
- Salt Lake Tribune [article](#) explaining that George Wythe University was unaccredited, and had a reputation of granting degrees students did not earn.
- Unable to verify non-profit history

Tyler Nelson

- No known lawsuits
- Verified that Tyler was the HOA board president of [Villa Bonita Estates](#).
- [Verified](#) employment with Intermountain West.

Jessica Ellis

- No known lawsuits
- No findings of note

Robert Marx

- No known lawsuits
- No findings of note

Mary Kavanaugh

- No known lawsuits
- No findings of note

Additional Appendices Findings

There are no major findings in Appendix B.

In appendix C it might be problematic that the bylaws allow for only 3 board members. That isn't enough for good governance.

In appendix D there is no attendance list included for the board meeting, so it is impossible to know who participated and in what capacity.

Appendix E is not included because the group is not applying for a waiver.

Appendix F was not included because the group has not entered into any contracts, but look at the contracts section for notes and questions.

Appendix G is the start-up grant application. See the Business and Operations Plan section for notes about the application.