

November 24, 2014

Mr. Joel Medley
NCDPI/Office of Charter Schools
6303 Mail Service Center
Raleigh, NC 27699

Re: Impact Statement for Davidson County Schools
Charter School Application filed on behalf of Fortis Academy, Inc.

Dear Charter School Advisory Board Members and State Board of Education:

Davidson County Schools appreciates the opportunity to give the Boards feedback on the recent charter application submitted by Dylan Parkes on behalf of the Fortis Academy group.

Davidson County Schools is the lowest funded school district in North Carolina based on per pupil expenditure despite being the twelfth largest school district in the State. Due to budget cuts over the last few years, Davidson County Schools has had to make some tough decisions in regards to teachers and teacher assistants and it is anticipated that the 2015-2016 budget could again cause a decrease in funding. Fortis Academy indicates that approximately 20% of its students will come from Davidson County Schools. As a result, the Davidson County Schools would experience an additional diminution of State and local operating dollars from its operating budget during a current downturn in the economy and in the future when it is nearly certain that the school system will be required to operate with additional significant budget cuts. Based on its projected enrollment in the first year of operation, the cost of Fortis Academy to the Davidson County Schools is estimated at over \$400,000.00 in State funding, approximately \$100,000.00 in local funding, and approximately \$52,000.00 in Federal EC funding. This effort has the potential to reduce Davidson County Schools' revenue more than \$552,000.00.

Most importantly, we ask that the application be examined to determine the qualification and the experience necessary to implement the proposed education plan so as to satisfy the six purposes of Charter Schools as defined by N.C.G.S. §115C-238.29A. Additionally, as indicated in their application, Fortis Academy does not intend to offer instruction at the 8th grade level until their third year of operation and they do not indicate any additional expansion beyond the 8th grade in their first five years of operation. Accordingly, any student that enrolls at Fortis Academy will potentially have to be re-acclimated into the existing local public schools. It would certainly be an unfortunate and unfair situation, to both the Administration and particularly the students, in the event these students are returned to the local public schools at a level which requires remediation by a financially overburdened system as compared to those students that remained enrolled within the Davidson County Schools.

Curriculum and Instruction

The instructional plan of Fortis Academy focuses on grammar, logic, rhetoric and intellectual cohesion. These areas of emphasis are divided into age groups of students: Kindergarten through 4th grade- Grammar Acquisition-learning facts and building vocabulary through teacher instruction, repetitious activities, and physical games. Grades 5-7 will concentrate on Logic through activities such as Socratic questioning, logical argument and reasoning. The plan discusses “passing the torch” as a method to teaching and learning. Grade 8 largely focuses on Rhetoric and making connections where knowledge and understanding are synthesized. The premise of this curriculum design is these three components: Grammar, Logic, and Rhetoric are developed through all content areas. Students of all levels including ELL, EC, and AIG will receive instruction through these three areas. Teachers are viewed as Academic Coaches and utilize repetition as a primary instructional strategy.

The Fortis Academy plan requires that teachers model instructional curiosity and healthful living. As a North Carolina public school we feel that this curriculum design will not adequately meet the needs of students. For the past several years the Davidson County Schools have participated in full implementation of the Common Core State Standards. Not only has the content of the curriculum changed but teaching methods emphasizing inquiry based learning and investigative practices are at the forefront of this new framework. Under the proposed plan for curriculum and instruction Fortis Academy emphasizes rote memorization and repetition of skills and vocabulary which we feel do not align with state standards.

Special Programs and At-Risk Students

According to the plan, interventions are scheduled during “regular instructional periods.” Best practice states that these interventions should not occur during regular instruction but during an enrichment/acceleration block of time integrated into the master schedule. A student in need of tier two intervention services should not be missing core academic time. Also, tier three intervention services should occur after a student receives two interventions on the tier two spectrum of services for 4-6 weeks each and fails to show adequate progress.

Additionally, there is no articulated plan to identify or support academically and intellectually gifted students. Questions that need to be addressed are:

- When will students be initially identified and what will be the qualifier?
- What supports for acceleration will be in place?
- How often will students receive additional supports outside of normal instructional time?
- How will classroom teachers differentiate for these identified students?
- Will there be an AIG nurturing program?

Intervention for “AtRisk” Students:

Davidson County elementary schools utilize benchmarks or “cut points” to determine when a student is not making adequate progress. Using that data, teachers create Personal Education Plans (PEPs), along with parents, to create a plan with a measureable goal for student progress. There is no mention of a systematic and data based method to determine when a student is “at-risk” or a method for determining a plan for student progress. With a lack of a systematic method, “at-risk” students are at a disadvantage.

Every Davidson County elementary school has a protected time in the master schedule to provide intervention for at-risk students. Teachers use evidence based practices, such as Leveled Literacy Intervention (LLI), during this time to ensure progress is accelerated. Every Title I school has at least one reading specialist that serves the instructional needs of at-risk students. The actual evidence based intervention practices, however, are not described and there is no mention of a specialist that is trained and dedicated to the needs of at-risk students. Additionally, we have benchmarks or “cut points” to determine when a student is not making adequate progress. There is no mention of a systematic and data based method to determine when a student is “at-risk”.

Diagnostic Assessment:

NC Read to Achieve also expects that all K-3 students shall be assessed with valid, reliable, formative and diagnostic reading assessments that address the National Reading Panel’s research on the Big 5 Ideas of reading (phonemic awareness, phonics, comprehension, fluency, and vocabulary). This implementation will be monitored for fidelity regarding benchmarks and progress monitoring. The assessment system that the state has adopted is mClass Reading 3D. All Davidson County elementary school teachers received training for full implementation of mClass for the 2013-2014 school year and all new hires are trained at the beginning of each academic year. There is no evidence in Fortis Academy’s research that assessments will be valid and reliable nor is there evidence of a plan for monitoring of fidelity. They state that running records will be used, which is a component of mClass, but do not mention any use of diagnostic probes that are directly correlated with student achievement.

504 Concerns:

Section 504 is a federal statute that requires the creation and execution of a plan for a student identified as an individual with a disability who has a mental or physical impairment that substantially limits one or more major life activities, has a record of such impairment, or is regarded as having such impairment. This plan must include specific accommodations and modifications to meet the needs of the student in compliance with the FAPE requirement when implemented. Procedural rights and safeguards are required to be established to address guidelines related to the identification, evaluation, or educational placement of children in schools that serve students under Section 504. Federal guidelines also require an established process for parents or guardians to challenge evaluations, placement procedures, and decisions through due process. In the Fortis Academy application, the Section 504 federal statute is not addressed. The procedure for construction and implementation of 504 plans, establishment of procedural rights and due process is also lacking in the application.

All educators only want what is best for their students in their community and all of us here at the Davidson County Schools recognize and share in Fortis Academy's willingness to educate the children of Davidson County. The Davidson County Schools will remain committed to providing for what is in the best interest of all of our students, regardless of the school they may choose to attend.

Respectfully submitted,

DAVIDSON COUNTY SCHOOLS

A handwritten signature in black ink, appearing to read "Dr. Lory D. Morrow". The signature is written in a cursive, somewhat stylized font.

Dr. Lory D. Morrow
Superintendent