



STATE COLLEGE AREA SCHOOL DISTRICT

Office of the Superintendent

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To: Board of Directors
From: Robert O'Donnell
Re: Wonderland Charter Renewal Review
Date: June 4, 2018

Following your April 23 consideration of Wonderland Charter School's request for renewal, we obtained further information pertaining to the school's finances and operations, as well as updated our understanding of its special education practices.

As per the Wonderland's approved charter, along with the charter school law, we requested information about the school's innovative characteristic noted within its mission and the vision sections of its charter: Individualized Education Plans (IEP), now referred to by Wonderland as Differentiated Education Plans (DEP), which includes student learning toward the school's "benchmark standards." To date, we have asked multiple times for this information, but each time, the school's Chief Executive Officer (CEO) refused to provide this information, or even to respond to a request for information.

Since late April, we have been contacted by many former Wonderland faculty members and current and former Wonderland families. During separate meetings, these individuals outlined Wonderland's long-standing, calculated, inappropriate, and unlawful practices with respect to students with special needs.

In light of the serious concerns we have identified, we propose that you take action to better understand Wonderland Charter School's practices, as noted in the attached resolution, via a Board hearing on July 2, 2018.

Although the below report summarizes our administrative team's review of the Wonderland Charter School, it does not include the information from the former Wonderland faculty members and current and former Wonderland families. Should you move to a hearing, those individuals will share their accounts of their experiences while at Wonderland; this will include all related documentation.

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I. Executive Summary

Over the last three months, the SCASD charter review team conducted an extensive review of the Wonderland Charter School and included several meetings with many former Wonderland faculty members and current and former Wonderland families. We have identified several points for the Board's attention.

- Student Achievement
 - Wonderland's student performance falls well below district performance on state and national assessments.
- Certification
 - Wonderland's Education Director does not have an administrative certification. This position appears to require certification according to PDE.
- Compensation and Staffing
 - Wonderland teachers are the lowest paid in the state, ranking 781st out of the 781 Local Education Agencies.
 - Wonderland's self-reported average years of experience for classroom teachers is 3.6, which ranks 767th out of the 781 Local Education Agencies, the bottom 2 percent.
- Finance
 - In many areas, including salaries, retirement benefits and tuition reimbursements, Wonderland's costs are not commensurate with SCASD's financial contributions.

- In program areas, specifically special education, Wonderland spends far less than it receives in funding from SCASD.
- Wonderland’s property lease includes a triple-net provision which leads to total costs in excess of current real estate market conditions.
- Student Services
 - Wonderland is not following the requirements of the English Learner Identification Procedures and utilizing one of the mandatory screening tools (KW-APT, K Model, the WIDA screen or the WIDA MODEL).
- Special Education
 - What we have found, what we believe, and what is reflected in the resolution, is that Wonderland has not, during the most recent five-year cycle, as well as the periods before that, complied with the requirements of the Charter School Law, as well as other statutes, rules, regulations that pertain to it, and its own policies, procedures, representations, and pronouncements.
- Curriculum
 - Wonderland’s general curriculum, which is very scripted, resembles what most school districts use as interventions for at-risk learners.

II. Charter School Renewal Procedures

During our April 9 Board meeting, Dr. Etter shared the legal parameters to your decisions pertaining to [charter school renewal](#).

As per [PDE’s guideline](#), the renewal decision begins with the previously submitted Annual Report and may require additional items as requested by the chartering district. Upon providing this notice to the chartering school district, the chartering district shall inform the charter school, within 30 days of the receipt of the charter school’s notice, of what additional information beyond the Annual Report is to be provided to the district for review. If districts wish to grant a charter renewal, they may waive a public hearing.

The chartering district’s request for information and documents may include, but is not limited to, the following: (1) all financial audits and financial reports; (2) standardized test scores; (3) PSSA results; (4) special education reports from the Bureau of Special Education, but not including any student identifying information; (5) audit reports from the Office of the Auditor General, and (6) documentation that shows the charter school met the measurable goals set forth in the charter school’s application.

The charter school’s annual report should provide an ongoing, comprehensive assessment of the charter school’s progress towards its goals. PDE’s guide suggests that the chartering school district should look to that report to begin its renewal process. The National Association of Charter School Authorizers (NACSA) states that authorizers should adhere to the below principles:

- Improve pupil learning;
- Increase learning opportunities for all pupils;
- Encourage the use of different and innovative teaching methods;

- Create new professional opportunities for teachers, including the opportunity to be responsible for the learning program at the school site;
- Provide parents and pupils with expanded choices in the types of educational opportunities that are available within the public school system; and
- Hold the schools established under this act accountable for meeting measurable academic standards and provide the school with a method to establish accountability systems.

Although these above criteria appear to be reasonable criteria for an authorizing board’s considerations, these are not contained within the [legal parameters for renewal decisions](#). However, we have referenced these principles during our assessment of the Wonderland school.

III. Student Learning

As per the school’s approved charter, along with the charter school law, we requested information about the school’s innovative characteristic noted within its mission and the vision sections of its charter: *Individualized Education Plans (IEP)*, now referred to by Wonderland as *Differentiated Education Plans (DEP)*, which includes student learning toward the school’s *benchmark standards*. . To date, we have asked multiple times for this information, but each time, the school’s Chief Executive Officer (CEO) refused to provide this information.

To help you understand what information we have obtained, this section contains Wonderland student performance data from several assessments, including the Pennsylvania System of School Assessment (PSSA), Terra Nova, and locally developed internal assessments.

Further below, we have included student learning information of Wonderland students who are currently students within SCASD. Our intent is to help understand how all SCASD resident students perform in a nationally normed assessment following their Wonderland experience.

Wonderland achieved the following overall PSSA pass rates for Spring 2017, with the numbers below indicating percent of students that scored proficient and advanced:

Pennsylvania System of School Assessment (Grades 3-5)

| Subject | Wonderland Pass Rate (%) | District Pass Rate (%) | State Pass Rate (%) | Wonderland Advanced Pass Rate (%) | District Advanced Pass Rate (%) |
|---------|--------------------------|------------------------|---------------------|-----------------------------------|---------------------------------|
| Math | 38.5 | 58.9 | 42.6 | 7.7 | 27 |
| Reading | 73.1 | 79.5 | 61.2 | 15.3 | 34 |
| Science | IS* | 77.4 | 63.7 | IS* | 41 |

* IS – Insufficient sample size (less than 10)

PSSA reports provided by Wonderland indicated the below PSSA pass rates for each area from 2015 to 2017. These numbers indicated the percent of students that scored proficient or advanced.

Pennsylvania System of School Assessment (Grades 3-5)

| | Mathematics | Reading | Science |
|------|---------------|---------------|---------------|
| Year | Pass Rate (%) | Pass Rate (%) | Pass Rate (%) |
| 2017 | 38.5 | 73.1 | IS |
| 2016 | 30.6 | 63.8 | 86.6 |
| 2015 | 31 | 72.4 | IS |

* IS – Insufficient sample size (less than 10)

Wonderland students in second through eighth grades who returned to SCASD this fall for the 2017-2018 school year participated in the Northwest Evaluation Association Measure of Academic Progress (MAP) assessments for reading and math. This is a nationally-normed adaptive assessment that is administered to 8 million students in 7,800 schools in 145 countries.

- Former Wonderland students currently attending SCASD grades 2-8, on average, performed at the 44th percentile and 53rd percentile in math and in reading, respectively.
- SCASD students in second through eighth grades, on average, performed at the 91st percentile and 92nd percentile in reading and math, respectively.

Wonderland administers the Dynamic Indicators of Basic Early Literacy Skills (DIBELS) to all students. DIBELS is a set of procedures and measures for assessing the acquisition of early literacy skills from kindergarten through sixth grade.

The DIBELS assessment is comprised of measures that function to identify children experiencing difficulty in acquisition of basic early literacy skills in order to provide immediate support and to prevent the occurrence of later reading difficulties.

At the conclusion of the 2016-2017 school year, 41 percent of Wonderland kindergartners were identified as requiring intensive to strategic support for literacy skill development. This year’s Wonderland kindergarten student DIBELS performance is consistent with last year’s trajectory — 47 percent of kindergartners at midyear identified as requiring intensive and strategic support. These are the basic building blocks of reading and indicate that nearly half of the Wonderland kindergartners are leaving their first year lacking the basic foundations for literacy development. This likely predicts future reading difficulties and could indicate a disability in reading.

Wonderland uses the DIBELS assessment for students in kindergarten only—no data was available for subsequent grade levels. Our team was unclear as to why this assessment sequence wasn't continued in subsequent grade levels as the information could be utilized in determining targeted reading interventions and/or special education support for a disability in reading.

Additionally, Wonderland uses the Terra Nova assessment to measure student achievement in reading and math. This assessment was last normalized in 2011 (7 years old) and does not provide recent and accurate information regarding students' achievement on grade-level benchmarks, especially as it relates to the increased rigor of PA core academic standards adjusted in 2015.

Wonderland's website includes that "Students mastered over 95% of their assigned objectives without stress! This is phenomenal! This had never been done before in the United States." The performance of Wonderland students performance on PSSA and MAP assessments (cited above) indicates that their assigned learning objectives do not align with state grade level standards.

Wonderland provided the following information regarding the percentage of students who met their identified learning objectives for each grade level as of April 2018:

| Grade Level | Objectives Met (%) |
|--------------|--------------------|
| Kindergarten | 85 |
| First Grade | 91 |
| Second Grade | 78 |
| Third Grade | 79 |
| Fourth Grade | 88 |
| 5th Grade | 84 |

The aforementioned learning objectives are based largely on attainment of objectives within the Reading Mastery and Connecting Math curriculum, which are typically used as intervention programs to support students who are performing below grade level (as in SCASD).

IV. Certification, Staffing, Compensation and Evaluation

A. Certification

Charter schools are required to have at least 75 percent of their professional staff hold appropriate State certification, hold at least a bachelor's degree, and demonstrate competency in the core academic areas in which they teach.

Wonderland provided a roster of 11 professional staff: 10 teachers and one teacher/chief executive officer. Of those, three hold Instructional II certification and the remaining eight employees hold Instructional I certification. Therefore, Wonderland meets the certification requirements with regard to teacher certification.

Two individuals are involved in Wonderland's teacher supervision and evaluation process, the CEO and the Education Director, neither of whom holds an administrative certificate. As per the state certification requirements summarized below, the Wonderland school does not fully meet PDE administrative certification requirements because the Education Director does not hold an administrative certificate.

These requirements are explained in the PA Department of Education Certification and Staffing Policy Guidelines (CSPG) 24 and 95:

CSPG 24 – Appropriate Certification In Charter Schools In Pennsylvania (November 1, 2015):

Charter school principals must be properly certified as required by 24 P.S. §11-1109 and meet Act 45 continuing education requirements.

If a charter/cyber school does not employ any individual in a position titled principal, but employs an individual in a locally titled position (i.e. school director) who performs all of the duties of a principal, the charter/cyber school must utilize an Administrative certified educator and identify the individual as Principal in PIMS/PERMS. Regardless of the local title given the position, if an individual serves in the position of Principal in a charter school, he/she must comply with all related Act 45 and PIL requirements. Local Education Agencies (LEAs) may not create and utilize local titles to avoid the mandates of Act 45 and specifically 24 P.S. §11-1109.

CSPG 95 – Principal, K-12 (August 1, 2013):

The School Principal certification qualifies the individual to provide instructional leadership and administrative supervision of any school when working with students in grades Kindergarten-12 within a school entity.

An educator holding a valid Pennsylvania certificate as a K-12 Principal is qualified to perform the following:

- a. Instructional leadership focusing on teaching and learning.
- b. Supervision and direction of certified and non-certified staff persons required for school operation exclusive of directing health services controlled by the Nurse Practice Act.

- c. Supervision of the district's curriculum and instructional program or pupil personnel services program.
- d. Assessing performance of certified staff persons.

We asked the PA Department of Education to clarify this certification requirement. They referred the question to their Office of Chief Counsel. The Office of Chief Counsel advised:

1. Wonderland may employ a CEO, and if it does, that person does not have to have a letter of eligibility or administrative certification.
2. Wonderland, in addition, is not required to employ a principal or other certified administrator.
3. However, if Wonderland does employ an educator (other than the CEO) in a principal position or employs the educator in a locally titled position that performs the duties reserved for a principal, then that educator must hold an appropriate administrative certification in accordance with 24 P.S. § 11-1109.

Wonderland advised that their Education Director "is intimately familiar with each and every teacher's work since she reviews all of the teacher's monthly lesson plans and calendars" and "thoroughly vets every student's Differentiated Education Plan (DEP) before the start of the school year and the progress updates presented to every parent at Parent/Teacher Conferences." Furthermore, Wonderland notes: "The outcome of this methodology is that the Education Director is solidly grounded in what each teacher is striving to accomplish and whether or not the teacher actually met the teaching goals agreed upon for the student. With the Educational Director's input, I [the CEO] formulate my initial draft and conduct an interview with the teacher."

Based on the statement from Wonderland, it appears that the Education Director is performing the duties typically assigned to a principal. And, based on the statement from the PA Department of Education, at that leadership level, this person needs to be titled and certified as a principal. A school leader that functions as a principal or assistant principal is required to complete PIL requirements and be properly certified and designated as a principal or assistant principal. We have written to the PA Department of Education providing this follow-up information and asking if our conclusion is correct.

B. Staffing

During our review of Wonderland's staff practices, we identified the following:

1. Faculty Service: During the past 10 years, the average length of service for teachers was 2.5 years. Of the current 10 teachers, two were newly hired for the 2017-2018 school year and five others are in their second year. That means that 70 percent of the teachers have been part of the Wonderland community for less than two years.

When reviewing [PDE's 2016-2017 statewide data](#), Wonderland's self-reported average years of experience for classroom teachers is 3.6, which ranks 767 out of 781 Local Education Agencies,

the bottom 2 percent. SCASD's average is 15.5 years, which ranks 130th of 781 — within the top 20 percent.

2. **Teacher Contracts:** Nine of the 10 classroom teachers receive annual employment contracts.
3. **Non-Compete Clauses:** Wonderland's employment contracts include two non-compete provisions: a prohibition on communicating to anyone the names and addresses of Wonderland families and a prohibition on employment with any public or private educational institution in the State College Area School District, the Bald Eagle Area School District, the Penns Valley School District, the Bellefonte Area School District, the Tyrone Area School District, the Clearfield Area School District, the Altoona School District, the Lock Haven School District, the Williamsport School District, or the Jersey Shore School District through the balance of the school year.
4. **Annual Report Staffing Note:** In reviewing Wonderland's current staffing levels, we identified inconsistencies with Wonderland's 2016-2017 Annual Report. For example, the Chief Executive Officer, Special Education Coordinator, and School Nurse are all listed in the 2016-2017 Annual Report as full-time positions (1.0 FTE). However, the information provided during the review identifies that for 2017-2018, each of these positions is part-time; the CEO is a 0.3 FTE position, the Special Education Coordinator is a 0.1 FTE position, and the School Nurse is a 0.05 FTE position.

During 2017-2018, the business manager is being compensated for the first time, according to records shared with the district. This individual is also listed as an owner of the property leased by Wonderland. The lease is attached to this report.

C. Compensation

The below information highlights Wonderland's compensation practices.

1. Wonderland's self-reported average salary for classroom teachers is \$27,593, ranking them last out of 781 Local Education Agencies (LEAs), according to [PDE's 2016-2017 statewide data](#). By comparison, SCASD's average salary for classroom teacher 2016-2017 was \$69,512, placing the district 140th out of 781 LEAs — within the top 20 percent statewide. Eight of the 10 Wonderland classroom teachers receive from \$22,500 to \$23,500 for this assignment. Additional compensation can be earned via additional duty stipends and bonuses. Finally, it should be noted that Wonderland teachers work 12-month annual contracts.

Note: The required calculation and payment from SCASD to Wonderland is based upon the full SCASD salary expenses.

2. Wonderland offers its employees free health care and dental insurance plans. This saves Wonderland employees about \$1,400 annually compared to the health care costs incurred by SCASD faculty members.
3. Charter schools are permitted to develop a 403(b) Plan if that plan is approved by PSERS. In 2016, Wonderland developed such a plan, which was approved by PSERS. Four then-existing teachers were grandfathered in PSERS, the seven new employees are all enrolled in the 403(b) Plan.

The 403(b) Plan does provide for employer contributions, matching employee contributions but not exceeding 5 percent of the employee’s annual compensation. The Plan includes a 2-year vesting period — meaning that any employee who leaves before working for Wonderland for 24 months does not receive the employer contribution. Over the past 10 years, 83.3 percent of the teachers who ended their Wonderland employment did so close to the 2-year mark; whether these individuals were vested at the time of termination is unknown.

In contrast, the state requires SCASD to contribute 16.3 percent of each employee’s salary to PSERS. For the seven Wonderland teachers enrolled in the 403(b), using district salaries and PSERS rate, the PSERS annual cost would be \$54,165. The actual maximum cost to Wonderland for these seven teachers, using Wonderland salaries and the 403(b) contribution rate, is \$10,771. That is an annual difference of \$43,395.

Note: As with employee salaries, the required calculation and payment from SCASD to Wonderland is based upon the full SCASD retirement expenses, as required by the PDE.

4. There is no reference in the Wonderland Charter School Policy & Procedures Manual to tuition reimbursement. However, Wonderland provided records of tuition reimbursement paid to teaching employees in **Table A**. In contrast, SCASD spends approximately \$310,000 per year in tuition reimbursement to teachers for continuing education, based on our contractual obligations.

Table A

| | |
|------|----------|
| 2017 | \$2,739 |
| 2016 | \$679 |
| 2015 | \$3,447 |
| 2014 | \$6,435 |
| 2013 | \$20,770 |

Note: The required calculation and payment from SCASD to Wonderland includes tuition reimbursement paid to district employees, as required by the PDE.

5. Paid Time Off: Pennsylvania School Code requires school districts to provide 10 sick days per year and permit those sick days to carry over from year to year. This provision does not apply to charter schools. Wonderland provides from 1 day/year to 5 days/year dependent on length of service and does not permit the days to carry over from one year to another. The Policy & Procedure Manual does not reference any additional paid time off.

Note: The required calculation and payment from SCASD to Wonderland includes the cost of providing paid time off to district employees, as required by the PDE.

D. Evaluation

In accordance with Act 82, PDE developed an Educator Effectiveness System to be used by school districts starting with the 2013-2014 school year. The goal was to develop a rating tool that reflected student performance measures and employee observation results. Charter schools are not required to implement the provisions of Act 82.

Wonderland uses a locally developed evaluation plan created in 1999. This plan does not include the data elements, four teacher observation and practice domains, and evidence/documentation incorporated in PDE's Educator Effectiveness System.

V. Finance

A. Costs

As provided in charter school law, the district is required to fund Wonderland on a per student annual tuition rate. The rate calculation is based on district costs and average daily membership. The district costs in the calculation include classroom, school counselors, nurses, psychologists, special education, English as a Second Language, gifted, and Title I, in addition to instructional support faculty and department level coordinators less federal funding. As included in the staffing discussion, the Wonderland staffing complement and compensation package is not comparable to that of the district despite receiving the funding from the district.

The analysis of expenses by object category compared to total expenses as a percentage was completed. Table B provides this analysis for the district and Wonderland. The district spends 68 percent of their budget on salaries and benefits while Wonderland spends 44 percent. Wonderland also spends 25 percent of its budget on professional services, while the district spends only 2 percent. Professional services by their nature require persons or firms with specialized skills and knowledge. Included are the services of architects, engineers, auditors, dentists, medical doctors, lawyers, consultants, teachers, accountants, tax collectors etc.

Tables B - Percentage of Total Expenses by Object

SCASD

| Percentage of Total | 2011 | 2012 | 2013 | 2014 | 2015 | 2016 |
|--|------|------|------|------|------|------|
| 100 PERSONNEL SERVICES – SALARIES | 55% | 53% | 49% | 46% | 45% | 44% |
| 200 PERSONNEL SERVICES – EMPLOYEE BENEFITS | 19% | 21% | 20% | 21% | 23% | 24% |
| 300 PURCHASED PROFESSIONAL AND TECHNICAL SER | 3% | 3% | 3% | 3% | 3% | 2% |
| 400 PURCHASED PROPERTY SERVICES | 2% | 2% | 2% | 2% | 2% | 1% |
| 500 OTHER PURCHASED SERVICES | 8% | 8% | 8% | 8% | 8% | 8% |
| 600 SUPPLIES | 3% | 3% | 3% | 3% | 3% | 2% |
| 700 PROPERTY | 2% | 2% | 2% | 2% | 2% | 2% |
| 800 OTHER OBJECTS | 0% | 0% | 0% | 0% | 0% | 0% |
| 900 OTHER USES OF FUNDS | 8% | 8% | 14% | 16% | 15% | 16% |

Wonderland

| Percentage of Total | 2011 | 2012 | 2013 | 2014 | 2015 | 2016 |
|---|------|------|------|------|------|------|
| 100 PERSONNEL SERVICES – SALARIES | 24% | 23% | 28% | 26% | 31% | 29% |
| 200 PERSONNEL SERVICES – EMPLOYEE BENEFITS | 11% | 8% | 12% | 12% | 13% | 15% |
| 300 PURCHASED PROFESSIONAL AND TECHNICAL SERV | 6% | 3% | 22% | 25% | 26% | 25% |
| 400 PURCHASED PROPERTY SERVICES | 41% | 36% | 20% | 20% | 10% | 21% |
| 500 OTHER PURCHASED SERVICES | 10% | 9% | 6% | 6% | 4% | 4% |
| 600 SUPPLIES | 8% | 19% | 10% | 6% | 8% | 5% |
| 700 PROPERTY | 0% | 1% | 1% | 4% | 8% | 1% |
| 800 OTHER OBJECTS | 0% | 0% | 0% | 0% | 0% | 0% |

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B. Property Lease

Wonderland Charter School engaged in a lease for the school building on May 31, 2016 with Wonderland Preschool & Daycare, Inc. The lease calls for annual payments starting at \$96,000, increasing at 1% per year over the 10-year period. The lease is a “Triple Net Lease,” being the parties intend that the landlord shall not have any responsibility of any kind or nature whatsoever to maintain, repair, improve, alter, or in any way incur any expense in connection with the property, including property taxes.

A market analysis of real estate properties in the area showed rates ranging from \$88,000 to \$105,000. However, the triple net option including annual lease payments is estimated to a cost of \$150,000. In addition, the property tax roll records the owners as Harold A. and Marilyn L. Ohnmeis, although Wonderland Preschool & Daycare, Inc. is listed as the landlord on the property lease. The property lease is included in the appendices to this report. This expense is recorded in purchased property services, which accounts for 21 percent of their budgeted expenses.

C. After-School Care Services

On an annual basis, the Wonderland Charter School spends \$200,000 through its professional services line item for what we understand to be its after-school care program. The school advertises this as a free service provided to all Wonderland families.

Although we have requested both through our review process, as well as Right to Know Law processes, Wonderland has yet to provide the information pertaining to how these public dollars are expended.

Because the Wonderland total annual budget is approximately \$1.4 million, we are concerned with such a high percentage (14.3 percent) of their resources not being expended on their instructional day at this high rate.

D. Performance Audit

The Office of Auditor General completed a performance audit of Wonderland in [September 2014](#). This report showed no findings or observations for the audit period 2010 to 2014.

E. Funding for Wonderland

SCASD provides annual funding to Wonderland as required PA School Code 24 PS 17-1725-A. For non-special education students the amount is no less than the budgeted total expenditures per average daily membership of the prior school year minus the budgeted expenditures of the district of residence for nonpublic school programs; adult education programs; community/junior college programs; student transportation services; for special education programs; facilities acquisition, construction and improvement services; and other financing uses, including debt service and fund transfers as provided in the Manual of Accounting and Related Financial Procedures for Pennsylvania School Systems established by the department.

For special education students, the same funding as for each non-special education student, plus an additional amount determined by dividing the district of residence total special education expenditure by the product of multiplying the combined percentage of section 2509.5(k) times the district of residence total average daily membership for the prior school year.

In 2017-2018, the annual per capita funding for SCASD non-special education students is \$14,008 and special education students is \$28,465. This funding is based upon the district's staffing, compensation, programming and operational costs. Wonderland's special education students only receive speech and language services, while the additional funding of \$14,457 per student for these students is based upon SCASD's special education programming, which is comprehensive. To date, SCASD is unable to determine where the differential in funding between speech and language and general education students is being used.

In addition, Wonderland is not enrolled in the school-based ACCESS program (SBAP) and, therefore, does not bill Medical Assistance (MA) for speech services.

VI. Student Services

A. Truancy Protocol

Teachers are responsible to record daily student attendance, collect excuses and turn them into the CEO. SCASD has the responsibility to enforce the compulsory attendance laws in accordance with the Public School Code.

Wonderland shared that it provides the parents/guardians of a student who has accumulated three unlawful absences with a notice stating any subsequent unlawful absences will result in a citation being filed with the magisterial district judge. However, it is the school district of residency's responsibility to file the citation and notify the charter school of any scheduled hearing.

Note: All cyber/charters in the State College Area School District, except Wonderland, issue the first offense (three unexcused absences or more) letter.

B. Truancy Elimination Plans

Wonderland addresses its infrequent cases of unexcused absences on a case-by-case basis. While it has an informal Truancy Elimination Plan for use when appropriate, it has not yet found the need to implement such a plan. Instead, it has utilized other less formal methods to ensure the regular attendance of its students including but not limited to: conferencing with parent/guardian, contacting CYS if appropriate, and meeting with CEO.

C. Process on Verifying Proof of Residency

From Wonderland CEO Kelly Raudabaugh:

“Wonderland has several indicators when a student’s residency changes. When parents are enrolling their child at Wonderland Charter School, they are required to submit documentation for verification of proof of residence. Under guidance from the PA Department of Education, approved documentation includes a current lease, a current mortgage, or a current utility bill. The original document that is submitted by the family is electronically scanned and used as substantiating documentation for the Charter School Student Enrollment Notification Form. The Charter School Student Enrollment Notification Form is signed by the Wonderland Charter School Chief Executive officer (CEO) and then scanned and stored in Wonderland Charter School’s main office computer. This scanned document is also forwarded to the student’s resident school district as residency verification for billing purposes. If parents move to a new residence, the parents notify the CEO and complete a new Charter School Student Enrollment Notification Form to be placed in the students file with an updated proof of residence. The resident school district is also notified in these circumstances.”

D. Nursing Services

From Wonderland CEO Kelly Raudabaugh:

“Wonderland Charter School employs a part-time school nurse who is shared by all four charter schools in the State College area. Wonderland Charter School does not administer medication as Pennsylvania Law prohibits school personnel (other than a school-certified RN) to do so. When children need medication, the student can self-administer or the student’s parent can come to the school and administer the medication to their own child. When children have medication to self-administer, the parent informs the front office that the student has medication to be self-administered and at what time. The medication is stored in a monitored area and only accessible at the time needed to be self-administered.”

Pennsylvania public schools are required to have a school policy regarding student medication administration. This is explained in the [Guidelines for Pennsylvania Schools for the Administration of Medications and Emergency](#):

Page 8 - Parent(s)/guardian(s) should administer medications at home whenever possible and should collaborate with their primary care provider to establish medication schedules that minimize administration at school. When a medication must be administered during school hours, the school district should have clearly written policies and procedures that will provide direction and guidance for medication administration to students, which are in accordance with state laws and regulations.

Page 9 - Federal law, requires the accommodation of students with healthcare needs in order to maximize their school attendance and to facilitate their highest level of functioning and learning. The CSN is the medical expert within the school setting who can work with the family, student and healthcare providers to determine what accommodations are required. The CSN collaborates with school administration, faculty and staff to develop plans that best meet the student's needs, and serve as an advocate for the student. These needs are best communicated through written plans of care. There are several types, some of which are required by professional standards of practice, such as the Individualized Healthcare Plan (IHP) and Emergency Care Plan (ECP); others are required by federal laws, such as a Chapter 15 Service Agreement(504) and Individualized Education Plan (IEP) with medical component.

Additionally, Pennsylvania public schools are required to have a school policy regarding student self-administration. This is explained in [PA Public School Code](#), Section 1414.1. - Possession and Use of Asthma Inhalers and Epinephrine Auto-Injectors:

Each school entity shall develop a written policy to allow for the possession and self-administration by children of school age of asthma inhalers and epinephrine auto-injectors, and the prescribed medication to be administered thereby, in a school setting. The policy shall comply with section 504 of the Rehabilitation Act of 1973 (Public Law 93-112, 29 U.S.C. § 794) and 22 Pa. Code Ch. 15 (relating to protected handicapped students). The policy shall be distributed with the code of student conduct required under 22 Pa. Code § 12.3(c) (relating to school rules) and made available on the school entity's publicly accessible Internet website, if any.

Currently, we have not located a Wonderland policy regarding student self-administration of medications. We have attached the school's policy manual to this report.

E. Student Assistance Program (SAP)

From Wonderland CEO Kelly Raudabaugh:

“We are completing the final stages of implementing our SAP Team. We have four team members trained and have met with the liaisons Kim Rimmey & Allison Brackbill from Centre County [MH/ID/EI - D&A office]. Starting SY 2018-2019, Wonderland Charter School's SAP team will meet the 1st and 3rd Wednesdays at 3:15 p.m. The four staff members trained are Kelly Raudabaugh, Kristin Myers, Jessica Liffers, and Taylor Ammerman. This past year, SY 2017-2018, these four members attended SAP training through DIAKON Family Services in Williamsport, PA.”

F. McKinney-Vento Homeless Education Assistance Act Policy

From Wonderland:

“Andrea Sheesley, Regional Coordinator, ARIN Intermediate Unit # 28 came to Wonderland Charter School and presented a PowerPoint to the entire staff on February 12th 2018. Andrea provided a packet of materials for staff which included a Guide to PA’s Education for Children and Youth Experiencing Homelessness Program, a pamphlet about PA Education for Children and Youth Experiencing Homelessness Program, a Regional Map for Homelessness Programs with contact information for each region, a flyer with her contact information, and a 3 page packet of information regarding preschoolers who may be experiencing homelessness. Mrs. Raudabaugh is the Liaison from Wonderland Charter School who would contact Andrea in the event Wonderland Charter School has a homeless family. Currently, Wonderland does not have any students identified as homeless.”

G. English as a Second Language Program for English Learners (ELs)

Title 22, Chapter 4, Section 4.26 of the state Curriculum Regulation requires that the school district and charter schools provide a program for every student who is limited English proficient (LEP) or an English learner (EL). The regulation states the following:

“Every school district shall provide a program for each student whose dominant language is not English for the purpose of facilitating the student's achievement of English proficiency and the academic standards under §4.12 (relating to academic standards). Programs under this section shall include instruction in English Language Development.”

Wonderland staff stated that all children are given a home language survey upon enrolling at the charter school. This identifies whether a language other than English is spoken in the home. This is consistent with SCASD’s new student enrollment practice.

As with all LEAs, SCASD and Wonderland are obligated by The Civil Rights Act of 1964, Title VI, to assess all students who are identified as speaking another language in their home. According to the PA Department of Education:

The Civil Rights Act of 1964, Title VI, Language Minority Compliance Procedures, requires school districts/charter schools/comprehensive CTC's to identify EL students. LEAs have a responsibility under federal law to serve ELs who need ESL/bilingual instruction as well as academic supports in order to be successful in school. See the English Learner Identification Procedure documents below. They outline the required procedures for identifying ELs and related policies.

[Requirements of English Learner Identification Procedures - K-12](#)

SCASD follows the ELIP requirements, as mandated by the Civil Rights Act of 1964. As indicated in the above link, the steps are:

- Review home language survey

- Conduct family interview
- Determine if a disability is suspected
- Review the student's academic records
- Screen the student's listening, reading and speaking abilities using [KW-APT, K Model, the WIDA screen or the WIDA MODEL screener](#)

In contrast, Wonderland follows a different procedure. They identify ELs by the following steps:

- Give a student the [Direct Instruction System for Teaching Arithmetic and Reading \(DISTAR\)](#) test that corresponds to his or her grade level (not the required WIDA Model)
- If a student passes the grade-level test, give him or her the test for the next-higher level of the [Direct Instruction Program](#).
- Continue testing up a level until the student does not pass the test.
- If a student fails the grade-level test, give him or her the test for the next lowest level.
- Continue testing down a level until the student passes the test.
- Tests are maintained and placed in the students assessment portfolio for future reference.

Based on PDE's stated requirements, Wonderland is not adhering to PDE's requirements of the English Learner Identification Procedures and utilizing one of the mandatory screening tools (KW-APT, K Model, the WIDA screen or the WIDA MODEL).

H. Service of Gifted Students

Wonderland does not identify students as gifted; charter schools are not mandated to comply with Chapter 16. At Wonderland, students' skills in subjects are progress monitored on a formal basis each month, and students are placed in the curricula based on that data, not based on their grade level.

I. Accuracy Certification Statements

Accuracy Certification Statement (ACS) for the October 1 upload: The data submitted to PDE indicates that Wonderland has no immigrant children. This is very unusual, as the definition of immigrant in the ACS is:

Immigrant as defined by PDE (PIMS)- age 3-21; not born in any state (Puerto Rico doesn't count); has not been attending one or more schools in any one or more states for more than three full academic years. In the case of re-entry into US schools, the academic years are cumulative: 0-12 months = 1 year; 13-24 months = 2 years; 25-36 months = 3 years.

J. Counseling Services

From Wonderland:

“Wonderland Charter School contracts services when needed for students through the MidStep Child Development Center, Intermediate Units, or other agencies as needed. For example, Wonderland Charter School recently partnered with TIDES to provide training to both teachers and a families regarding grief and death.”

K. Safe Schools Requirements

PDE requires that each school report specific offenses as outlined in the Pennsylvania Information Management System (PIMS) manual. The Safe Schools report provided by Wonderland lists that there were no reportable offenses to the state.

VII. Special Education Services

Currently, Wonderland has 14 of their 79 students accessing special education services, all of whom are receiving speech and language services via an Individualized Education Plan (IEP). Wonderland has no students identified with any other exceptionalities. In comparison, the three other charter schools in Centre County do have students with other disabilities (other than speech). Speech services are provided via a contract with a PA School Certified Speech Pathologist who is at Wonderland two days per week.

Wonderland employs a part-time Special Education Coordinator (.10 FTE) who is also a classroom teacher. When Wonderland needs school psychology services, it states that it contracts with the CIU-10; however, the CIU-10 has confirmed they have not contracted with Wonderland during the last five years.

Charter schools do not submit a three-year Special Education Plan but rather, an annual Special Education Plan Report. Wonderland’s annual plan report includes its special education plan information. The Wonderland Annual Report for 2016-2017 offers these *Chapter 711 Assurances*:

Implementation of a full range of services, programs and alternative placements available to the Charter School for placement and implementation of the special education programs in the Charter School.

Implementation of a child find system to locate, identify and evaluate young children and children who are thought to be a child with a disability eligible for special education residing within the Charter School's jurisdiction. Child find data is collected, maintained and used in decision-making. Child find process and procedures are evaluated for their effectiveness. The Charter School implements mechanisms to disseminate child find information to the public, organizations, agencies and individuals on at least an annual basis.

Assurances of students with disabilities are included in general education programs and extracurricular and non-academic programs and activities to the maximum extent appropriate in accordance with an Individualized Education Program.

Following the state and federal guidelines for participation of students with disabilities in state and Charter School-wide assessments including the determination of participation, the need for accommodations and the methods of assessing students for whom regular assessment is not appropriate.

Assurance of funds received through participation in the medical assistance reimbursement program, ACCESS, will be used to enhance or expand the current level of services and programs provided to students with disabilities in this local education agency.

Wonderland's plan also delineates their Special Education Professional Development which was completed in June 2017. As of March 2018, Wonderland faculty members received no training in special education during the 2017-2018 school year.

A. Child Find Process

IDEA and Chapter 14 [22 Pa. Code §300.111] require that all public schools, including charter schools, must have a process by which all students are assessed and, even if *suspected of having a disability*, are provided a full evaluation for special education services. The Wonderland Child Find Policy (13.5) is attached within the *Wonderland Policy and Procedures Manual*. Within the manual, the CEO or designee is responsible to establish a system of screening for all children. Wonderland's current screening process relies on the Terra Nova, DIBELS, and curriculum-based placement tests (published by Scholastic, Inc. for Reading Mastery and McGraw Hill, Connecting Math Concepts).

The Wonderland screening process includes progress monitoring built into the curricula, although the monitoring results did not lead to any referrals for multidisciplinary evaluations from 2015 to 2018. Our team has not seen any evidence that the results of this ongoing progress monitoring have identified any students who are suspected of having a disability, as is required by the Child Find Process.

Two visits were made to Wonderland; one by our Board and one by District Administrators. Both visits resulted in observations of questionable practices in a public school. The Board visit included observations of students placed in reading lessons that were multiple grade levels below the age-appropriate placement. During the visit, we were informed by CEO Kelly Raudabaugh that the observed students experienced the school's general education curriculum where they performed (regardless of age or grade).

Instructional grouping at an academic level that is well below that of one's age peers indicates a pattern of underachievement that strongly suggests the presence of a condition or factor that is interfering with learning, including a learning disability. Under the Child Find requirements of PA Chapter 14 and the federal IDEA regulations, charter schools as public schools are required to monitor all students' progress

closely to identify possible learning problems, such as that which was observed during our visit to Wonderland. All student progress is to be closely monitored so that students with learning problems are identified and referred for a multidisciplinary evaluation to determine the presence of a disability and degree of need for special education. This approach did not meet the spirit of the Child Find expectations, as per IDEA and Chapter 14.

In 2015-2016, three students were referred for Multidisciplinary Evaluations. Two were found eligible for special education, speech and language, and one was not.

In 2016-2017, five were referred for Multidisciplinary Evaluations. Two were found eligible for special education, speech and language, and three were not.

So far in 2017-2018, five students were referred for Multidisciplinary Evaluations and all five were found eligible for special education — all in speech and language services via an IEP.

| Identification of Students with Needs for Special Education Services | | | | | |
|---|--|--|--------------------|--|---|
| School Year | Child Find Students (evaluations by Wonderland) | Transition to Kdg & Transfers with IEPs | Speech IEPs | Total of Students with IEPs (speech only) | Notes |
| 2015/2016 | 3 | 0 | 13 | 13 | One student already enrolled at Wonderland Charter School referred for MDE. Outcome was 'not converted to special education status.' Two picked up for Special Education. |
| 2016/2017 | 2 | 3 | 14 | 14 | Three Early Childhood Intervention students on IEPs referred for MDEs. Two students retained in Special Education and 'one student converted' back to Regular Education. |
| 2017/2018 | 3 | 2 | 14 | 14 | All five students' (Child Find plus Transition) outcome was Special Education for speech services only. |

Source: Wonderland CEO Kelly Raudabaugh

Note: The differential between the sum of "# of Child Find Students" plus "Transition to Kdg & Transfers on IEPs" and the number of students in the column "Total # of Students on IEPs" is the number of students already enrolled at Wonderland Charter School and already on IEPs from the previous year minus any in the graduating class.

From Wonderland CEO Kelly Raudabaugh:

“The Multi-Disciplinary Evaluation (MDE) is the responsibility of the Chief Executive Officer (CEO). The composition of the MDE Team varies by the suspected disability of the student. It can be as low as a Speech-Language Clinician, a Highly

Qualified Regular Education Teacher, Parents, and a Local Educational Agency (LEA) Representative, i.e., 5 members. A student with more wide-ranging disabilities could have an MDE Team up to and more than 10 members. These could include psychologist(s), Occupational Therapists, Physical Therapists, and so on. The MDE membership is strictly tailored to the needs of the students and proper following of *Procedural Safeguards*. It is the duty of Wonderland Charter School's Special Education Coordinator to insure all input from all of the MDE Team is inputted into *IEPWriter* which catalogs input, highlights compliance and non-compliance of special education laws and regulations and produces the finished documents of a *Comprehensive Evaluation Report (CER)*, *Individualized Education Plan (IEP)*, and *Notification of Educational Placement (NOREP)* among other required documents required by the MDE Team."

B. Compliance Monitoring

In February 2013, Wonderland was monitored by the PDE's Bureau of Special Education.

Areas identified for Corrective Action after PDE Compliance Monitoring included:

- Positive Behavior Support
- Child Find
- Confidentiality
- Complete data on PTE Consent Form
- Lack of appropriate instruction in reading
- Lack of appropriate instruction in math
- Limited English Proficiency
- IEP was completed within timelines
- Student's present levels of academic achievement
- Student's present levels of functional performance
- Parental concerns for enhancing the education of the student
- How the student's disability affects involvement and progress in the general education curriculum
- Strengths
- Academic, developmental, and functional needs related to the student's disability
- Description of how student progress toward meeting goals will be measured
- Staff training in the safe and permitted use of restraints to control aggressive behaviors
- Development of a handbook and its website to include Child Find Policy
- Parent survey
- Teacher survey

A review of the Wonderland CS Facilitated Self Assessment (FSA) completed as a result of cyclical monitoring indicates that all identified areas have been corrected and closed out by the Pennsylvania Department of Education (PDE).

The Special Education Data Report School Year 2016-2017 reports 17.7 percent of the Wonderland population receives services for Speech and Language Impairment (SLI), while the state average for the same services is 2.2 percent. Similarly, SCASD's percentage of students receiving the same service is 1.3 percent.

SCASD's 2016-2017 total population of students receiving special education services, including SLI, was 10.8 percent. As noted above, SLI services were provided to 1.3 percent of the overall SCASD student population.

In comparison, to our knowledge, Wonderland has never provided special education services, other than Speech and Language Impairment, to any student during the past five years.

VIII. Student Enrollment

Wonderland Charter School-enrolled children normally must have achieved their fifth birthday by Aug. 31 of the start of their kindergarten year.

Preferential Status

- A. Staff members with children eligible to attend will be granted first priority.
- B. Families with children currently enrolled in Wonderland Charter School will be granted second priority.
- C. Families with children that have previously been enrolled at Wonderland Charter School will be granted third priority.
- D. Families residing within the geographical boundaries of the State College Area School District but who do not currently or have had in the past children enrolled at Wonderland Charter School will be granted fourth priority.
- E. Families residing outside of the geographical boundaries of the State College Area School District but within the geographical boundaries of the Commonwealth of Pennsylvania and do not currently or have had in the past children enrolled at Wonderland Charter School will be granted fifth priority.
- F. Families residing outside of the geographical boundaries of the Commonwealth of Pennsylvania are not eligible to enroll their children at Wonderland Charter School.

In the event the number of Letters of Interest (LOI) submitted is greater than the available enrollment spaces, then a lottery is required to be conducted to allocate enrollment spaces.

At the time of our visit on March 29, 2018, Wonderland Charter School had 79 students enrolled in grades K-5. Of the total, 48 students are residents of the State College Area School District, making up 61 percent of the total student population. The remaining 31 students are from school districts in Blair, Centre, Clearfield, and Huntingdon Counties. The following school districts are represented through at least one enrolled student:

| | |
|--------------------------|----|
| Bald Eagle Area | 4 |
| Bellefonte Area | 14 |
| Clearfield Area | 1 |
| Juniata Valley | 3 |
| Penns Valley Area | 3 |
| Philipsburg-Osceola Area | 1 |
| State College Area | 48 |
| Tyrone Area | 5 |

IX. Curriculum

A. Curriculum Scope and Sequence Framework Grades K-5

According to the Wonderland representative, the school's standards are stored in a database where they are aligned to the PA Academic Standards and the programs they use for instruction. Drawn from the database of standards, report cards are then created for student, with individualized learning objectives (task, condition, and standard) included. We do not see evidence of a standards aligned curriculum; the reported database is a list of standards, which is not a curriculum. Wonderland reports that it conducts a School Improvement Review every summer which includes the following: how well the students assigned objectives, whether any state or local educational requirements changed, what student weaknesses are prevalent (macro and micro), any new educational curricula being published, any state standards changes, the results of parental surveys, input from teachers, and review of homework, assessments, and student portfolios.

B. Reading

The Wonderland curriculum is framed around a direct instruction model for reading. Beginning in kindergarten, students participate in the Horizons Reading Program, which is a systematic, explicit instruction phonemic awareness and phonics program. Starting in first grade, students participate in the Reading Mastery basal program. Using a script, teachers focus on the following areas: phonemic awareness, letter-sound correspondence, phonics, word recognition, vocabulary, oral reading fluency, and comprehension. In addition, students in grades pre-K to 2nd grade participate in Language for Learning, which is a continuation of the DISTAR Language I program. Language for Learning is a highly systematic and explicit program. According to Wonderland's documents, Reading Mastery Signature Edition met 95% of the ELA Standards prescribed in the Common Core State Standards. Students in grade one also participate in Language for Thinking to expand skills from Language for Learning.

C. Writing

There was no evidence of a writing curriculum, resource, or program. When asked, the Wonderland representative talked about handwriting and mechanics rather than a formal writing program.

D. Math

In math, all students participate in the Connecting math Concepts math program. The program provides highly explicit and systematic instruction in the wide range of content specified in the Common Core

State Standards for Mathematics. Also available is Essentials for Algebra, which is designed for students in middle school or high school who are at risk of failing to meet graduation requirements in math. DISTAR Arithmetic is also used to teach the fundamental skills and concepts. Students master rote, rational, and ordinal counting; algebra operations; concepts of more and less; simple picture and story problems; column addition and subtraction problems; and work with multiplication and fractions.

The programs included in the Wonderland curriculum are programs State College Area School District uses in its special education program as well as in its Response to Instruction and Intervention process. These programs are all based on an explicit, direct instruction model.

E. Science and Social Studies

A list of science and social studies topics by month was shared, but there was no evidence of a curriculum document. Formal science and social studies instruction is completed through the use of Harcourt textbooks in grades 3 through 5.

X. Appendices

- A. [Wonderland's charter](#)
- B. [Pennsylvania Department of Education's guidelines for authorizing districts](#)
- C. [Charter school law – renewal](#)
- D. [Wonderland's annual report 2016-2017](#)
- E. [Wonderland's property lease](#)
- F. [Wonderland's child find process](#)
- G. [Wonderland's policy manual](#)