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# Board Cover Memorandum

**To** Board of Education

**From** Kyla Johnson-Trammell, Superintendent  
Curtiss Sarikey, Chief of Staff  
Sonali Murarka, Executive Director, Office of Charter Schools  
Madison Thomas, Policy and Compliance Specialist, Office of Charter Schools

**Meeting Date** February 23, 2022

**Subject** Material Revision to Lighthouse Community Charter High School’s Admission Preferences – Decision Hearing

**Ask of the Board** **Vote** on the Lighthouse Community Charter High School - Grades 9-12 - July 1, 2020 - June 30, 2025 - Material Revision Request to change lottery preferences or admission procedures in order to accommodate recruiting and accepting an unsheltered student population to meet the demands of this vulnerable student population.

**Background**

- Lighthouse submitted a material revision request on 12/3/21 which was deemed complete on 12/22/21. The material revision request revises the charter school’s admissions preferences to create a priority for homeless/unsheltered students and to reorder existing priorities.
- An initial public hearing was held for the material revision on 2/9/22. Representatives from the lead petitioning group presented.

**Discussion** Office of Charter Schools staff and Superintendent recommend **approval** of this material revision request. We believe this material revision is consistent with the District’s efforts to encourage charter schools to serve a higher proportion of high-needs students.

**Fiscal Impact** Minimal. The overall number of students admitted to the charter school will not change.

**Attachment(s)**

- 22-0171 - Staff Recommendation - Lighthouse Community Charter High School Material Revision - Enrollment Priorities
- 22-0171 - Lighthouse Community Charter High School Revised Petition RED LINE
- 22-0171 - Lighthouse Community Charter High School Revised Petition CLEAN



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**Lighthouse Community Charter High School**  
**Material Revision**  
**Staff Report**  
*February 23, 2022*

**SUMMARY OF RECOMMENDATION**

**Approve** the Material Revision (“Material Revision”) to the current Lighthouse Community Charter High School (“Lighthouse High” or “Charter School”) charter petition’s admission preferences in order to accommodate recruiting and accepting an unsheltered student population to meet the demands of one of Oakland’s most vulnerable student populations. The relevant text revisions are found on page 129 of the Revised Petition. A summary of requested revisions is shared in Appendix I of this Staff Report.

Under the Material Revision, Lighthouse is requesting to revise and reorder their enrollment priorities, which includes the following changes:

- Adding a preference for homeless/unsheltered students,
- Reducing the percentage of children of Lighthouse Community Public Schools (“LCPS” or “Lighthouse”) board members and staff that are prioritized from 10% to 2.5%,
- Removing the preference for a sibling of a graduate of any LCPS charter school, and
- Minor (non-substantive) revisions of the language in three priorities to align with other LCPS charters.

The requested revision does **not** include an increase in the maximum authorized enrollment stated in its charter. If adopted, the revision of the enrollment priorities would take effect for the lottery occurring in March 2022 for enrollment in the 2022-23 school year and would continue through the remainder of the charter term (through June 30, 2025).

Staff recommends that the OUSD Board of Education approve the Material Revision of Lighthouse High’s admissions preferences. This recommendation is based on numerous considerations, including (but not limited to) the following:

- This revision does not include an increase in the authorized maximum enrollment of the charter.
- The addition of a preference for homeless/unsheltered students is in line with the District’s priority to encourage charter schools to serve a higher proportion of high-needs students.
- LCPS has shown a demonstrated effort to recruit homeless/unsheltered students following the addition of this priority in LCPS’ other two schools, resulting in an increase of the enrollment percentage of this group from 1.2% to 3.4% across LCPS’ three schools.
- LCPS is in compliance with all federal, state, and local regulations required to serve this student population equitably.

### PROCEDURAL BACKGROUND

- 1) LCPS staff submitted the Material Revision to the District on 12/15/21. It was reviewed by OUSD staff and determined to be complete.
- 2) The Material Revision was introduced into the record as a new legislative matter on 1/26/22.
- 3) An initial public hearing was properly noticed and held on February 9, 2022. Representatives from LCPS presented to the OUSD Board.
- 4) A decision hearing is to be held on February 23, 2022, which will be properly noticed.

### RELEVANT STATUTORY BACKGROUND

**Education Code §47607(b):**

*[M]aterial revisions of charters are governed by the standards and criteria described in Section 47605, and shall include, but not be limited to, a reasonably comprehensive description of any new requirement of charter schools enacted into law after the charter was originally granted or last renewed.*

### ANALYSIS

Staff evaluate charter school material revision petitions with the following criteria:

Criteria	Education Code Reference(s)	Did the Material Revision Meet the Standard for this Criterion?
<i>Criterion I:</i> Does the Charter School Present a Sound Educational Program?	§47605(c)(1)	Yes
<i>Criterion II:</i> Is the Charter School Demonstrably Likely to Successfully Implement the Proposed Educational Program?	§47605(c)(2)	Yes
<i>Criterion III:</i> Is the Petition Reasonably Comprehensive?	§47605(c)(3) thru (6);§47605(h)	Yes
<i>Criterion IV:</i> Is the Charter School Demonstrably Likely to Serve the Interests of the Entire Community in Which the School is Proposing to Locate?	§47605(c)(7)	N/A <sup>1</sup>
<i>Criterion V:</i> Is the School District Positioned to Absorb the Fiscal Impact of the Proposed Charter School?	§47605(c)(8)	N/A <sup>2</sup>

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<sup>1</sup> According to Education Code 47607(a)(3-4), Criterion IV may only be applied to material revisions proposing expansion.

<sup>2</sup> According to Education Code 47607(a)(3-4), Criterion V may only be applied to material revisions proposing expansion.

For Criteria I and II, detailed evidence is presented below in three domains aligned to the OUSD Community of Schools Board Policy. These domains are:

- Academic Quality [Criterion I]
- Operational Sustainability [Criterion II]
- Equity and Access [Criterion II]

**Criterion I: Academic Quality**

A focused analysis of Academic Quality for homeless/unhoused students is not available because the number of homeless/unsheltered students enrolled at LCPS schools did not reach the threshold required by the California Department of Education. Therefore, we look to the general academic quality of the school.

Given the disruptions from the pandemic and the lack of State testing data since 2019, Staff has reviewed the analysis in the Charter School’s 2019-20 Renewal Staff Report and determined that Lighthouse High **meets Criterion I**.

<b>2019-20 Lighthouse High Academic Analysis Overview</b>	
<b>Strengths</b>	<b>Areas of Concern</b>
<ul style="list-style-type: none"> <li>● Outperformed all OUSD comparison schools in both ELA and Math State test scores for all years of the charter term.</li> <li>● Consistently strong A-G graduation rates of near 100% during the charter term, indicating college/career readiness of their graduates.</li> <li>● Strong performance among two key student groups: Latinx students and economically disadvantaged students.</li> </ul>	<ul style="list-style-type: none"> <li>● Significant declines in the 2017-18 and 2018-19 in both ELA and Math State test scores: test scores for 11<sup>th</sup> graders declined by 40 percentage points in ELA and by 27 percentage points in Math over the course of the charter term</li> </ul>

**Criterion II: Operational Sustainability & Equity and Access**

Staff has determined that Lighthouse High **meets Criterion II** based on the following evidence in Operational Sustainability as well as Equity and Access.

*Operational Sustainability*

- A. **Recruitment:** In December 2020, the OUSD Board voted to approve a material revision for the two other schools that are part of the LCPS Charter Management Organization: Lighthouse Community Charter School (which serves grades K-8) and Lodestar. These material revisions both revised and reordered the schools’ admission preferences in a manner similar to the changes laid out in the current material revision request for Lighthouse High, including the addition of a priority for homeless/unsheltered students. Following this approval, LCPS has seen increases in their enrollment of

homeless/unsheltered students from 18 students in the 2020-21 school year to 52 students in the 2021-22 school year, representing a nearly 2.5x increase<sup>3</sup>. Based on this increase, and the recruitment efforts led by Lighthouse Staff such as their current partnership with Oakland Housing Authority, Staff has determined Lighthouse High will likely be successful in the recruitment of this student population.

**Table 1: LCPS Homeless/Unsheltered Student Population**

Year	Lighthouse High	Lighthouse Community Charter School	Lodestar	Total
2019-20	0	0	0	0
2020-21	3	6	9	18
2021-22	10	17	25	52

*Source: 2019-20 and 2020-21 California Department of Education Enrollment Report: Enrollment by Subgroup; 2021-22 estimates provided by LCPS staff*

**B. Implementation:** Staff has reviewed the program and supports available for homeless/unsheltered students at LCPS. Staff has determined LCPS to be in compliance with all federal, state, and local regulations and has no reason to believe Lighthouse High will be unsuccessful in serving this vulnerable student population. The following are examples of key supports outlined in the *LCPS Board Policy: Education of Homeless (“Unsheltered”) Children and Youth*:

- As required by 42 USC 11432(g)(1)(J)(ii), LCPS has designated a full-time staff member to serve as the School Liaison for homeless students.
- The School Liaison ensures that all homeless/unsheltered students will receive all educational services for which they are eligible, including referrals to health care services, dental services, mental health services, substance abuse services, housing services, and more.
- The School Liaison ensures that all school personnel providing services will receive professional development and other support
- The School Liaison supports families of homeless/unsheltered students with transportation services and options, as applicable.

### *Equity and Access*

According to the California Department of Education, in the 2020-21 school year, there were approximately 897 homeless/unsheltered students enrolled across Oakland District and charter schools. During that year, 1.2% of students enrolled at LCPS and at Lighthouse High specifically were homeless/unsheltered students, below the OUSD average of 2.1% and below the median of 1.9% for OUSD high schools (see Table 3).

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<sup>3</sup> Data from 2020-21 are sourced from the California Department of Education Enrollment Reports. Data from 2021-22 and beyond are estimates provided by Lighthouse Community Public Schools staff as certified figures have not been released as of February 2022.

As discussed earlier, following the addition of an enrollment preference for homeless/unsheltered students to the Lighthouse Community Charter School and Lodestar petitions, LCPS increased their enrollment of this student population by approximately 2.5x, corresponding with an estimated enrollment percentage across LCPS schools of 3.4%. Staff has therefore determined that the addition of this preference for Lighthouse High will likely continue to increase access for this student population and is directly aligned with the District’s priority to encourage charter schools to serve a higher proportion of high-needs students.

*Note: Because the number of homeless/unsheltered students enrolled at LCPS schools did not reach the threshold required by the California Department of Education, data is not available for subgroup analysis of ELA/Math test scores, Graduation Rate, or College/Career readiness.*

**Table 2: 2020-21 OUSD High School Enrollment of Homeless/Unsheltered Youth**

<b>School</b>	<b>% Homeless Youth (schoolwide)</b>
Castlemont High	13.1%
Dewey Academy	3.1%
Fremont High	12.7%
LIFE Academy	0.2%
Madison Park Academy 6-12	1.9%
McClymonds High	1.4%
MetWest High	0.4%
Oakland International	32%
Oakland High	3.9%
Oakland Tech	0.4%
Skyline High	1.2%
<b>OUSD High Schools Median</b>	<b>1.9%</b>
<b>Lighthouse Community Charter High</b>	<b>1.2%</b>

*Data source: 2020-21 California Department of Education Enrollment Reports*

**Criterion III: Is the Petition Reasonably Comprehensive?**

Staff has determined that Lighthouse High **meets Criterion III** based on an evaluation of the components of the petition and the inclusion of the District Required Language.

**APPENDIX I – Charter Petition Revisions**

*If the Material Revision is approved, the existing Board-approved charter petition for Lighthouse would be amended to incorporate the revisions specified below.*

**Table 3: Proposed Changes to Admissions Preferences**

Priority Number	Current Petition Text (pg. 121)	Proposed Revision (pg. 129)
1	A graduate of Lighthouse’s K-8 school	A graduate of Lighthouse’s K-8 school
2	A sibling to a current LCCPS student in either the K – 8 Lighthouse Community Charter School and/or the 9 – 12 Lighthouse Community Charter High School	A sibling to a current student in either K-8 Lighthouse Community Charter School and/or the 9-12 Lighthouse Community Charter High School: to keep families together
3	Not to exceed 10% of the total enrollment; A child of a school faculty, staff, board, or founding development group member of LCCS or LCCHS as defined by the petition signatures submitted to the district at the time of the establishment of each charter school pursuant to EC 47605	Children of Lighthouse staff and LCPS board members (not to exceed 2.5% of the total enrollment): to honor those committed to public education
4	A sibling of a graduate of any LCPS charter school	Students who are homeless/unsheltered during the time of enrollment or who become unsheltered while on the waiting list. <sup>1</sup>
5	An Oakland resident residing in Zip Codes 94621 or 94603	Students living in the 94621 or 94603 zip code.
6	Any other Oakland residents	Other prospective students residing within OUSD boundaries: as required by Education Code Section 47605(d)(2)(B) and to serve as a public school option for students and families of Oakland.
7		All other applicants.

<sup>1</sup>Petition includes the following definition: (For the purposes of the charter, unsheltered will be defined by MCKINNEY-VENTO DEFINITION OF HOMELESS 42 U.S.C. § 11434a(2) The term “homeless children and youth”— A. means individuals who lack a fixed, regular, and adequate nighttime residence...; and B. includes — i. children and youths who are sharing the housing of other persons due to loss of housing, economic hardship, or a similar reason; are living in motels, hotels, trailer parks, or camping grounds due to the lack of alternative adequate accommodations; are living in emergency or transitional shelters; or are abandoned in hospitals; ii. children and youths who have a primary nighttime residence that is a public or private place not designed for or ordinarily used as a regular sleeping accommodation for human beings...; iii. children and youths who are living in cars, parks, public spaces, abandoned buildings, substandard housing, bus or train stations, or similar settings; and iv. migratory children...who qualify as homeless for the purposes of this subtitle because the children are living in circumstances described in clauses (i) through (iii).

**Additional Revisions Required by the District**

The Office of Charter Schools requires charter schools to update the following parts of their petition to reflect the current District language when submitting a material revision:

- Statement of Assurances
- District Required Language
- A reasonably comprehensive description of any new requirements of charter schools enacted into law after the charter was last renewed

Lighthouse complied with all these requirements. The Material Revision Petitions includes:

- The 2021-22 version of the District’s Statement of Assurances (pg. 6-9)
- The 2021-22 version of District Required Language (throughout petition elements)
- A description of any new requirements of charter schools enacted into law after the charter was last renewed, embedded throughout.