



California  
Charter Schools  
Association

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**Sent Via Email and First Class Mail**

Marino@kaplanmarino.com

May 22, 2019

Nina Marino

Kaplan Marino

9454 Wilshire Blvd # 500, Beverly Hills, CA 90212

Re: **Status of Non-Academic Accountability Concerns**

Dear Ms. Marino,

Thank you for engaging with the California Charter Schools Association through the non-academic accountability process. I appreciate Academics Arts and Action Academy's (A3) two written responses, "*2018\_26\_11\_Valiant Response to CCSA*," and "*A3 Responses to CCSA Inquiries 2.21.19*" and your willingness to meet with us on January 28<sup>th</sup>, 2019.

I'd like to address the status of the concerns raised:

- **Use of public funds for private Christian tuition:** I understand from the provided email correspondence that the partnership with Christian Heart did not come to fruition. The concern regards to Christian Heart has been addressed.
- **The September 2017 improper campaign contributions made by Academics Arts and Action Charter as reported on Form 496 Independent Expenditure Report:** I understand from the response, "*2018\_26\_11\_Valiant Response to CCSA*," that A3 believed to be contributing to "community development, not for any candidate." If that is accurate, per CCSA's recommendation during the January 28<sup>th</sup> meeting, CCSA urges A3 to request in writing a refund of the \$40,000, if not already completed. I respectfully request confirmation of this request.
- **Moving students among A3 affiliated schools without the consent or knowledge of the parents:** A3's responses provided general descriptions of processes and instances in which students would be transferred between A3 affiliated schools. However, these responses did not address the details of the underlying claims that staff were directed to move students between A3 affiliated schools multiple times, which appears to be in conflict with the stated process. No documentation was provided demonstrating that the organization investigated this matter, besides interviewing Valiant leadership, who were specifically cited in reports as being involved in the initial concern. Thus, CCSA does not find these responses satisfactory in addressing the concern.
- **The practice of maintaining students as "enrolled" even when the students have left the school:** A3 provided a description of how students are disenrolled and the explanation that a student could not be kept enrolled due to safeguards provided by CALPADS. However, as shared in-person, the initial claims specifically noted that the students that remained enrolled even when they had left the school returned to *private schools*, which do not participate in CALPADS. No follow up response was provided to this unresolved issue. In addition, no response was given to the question as to how all A3 affiliated schools could be claiming an average ADA rate of 225% of enrollment for the 2017-18 school year. The CDE has recently released the 2018-19 P1 data and this average has gone up to an ADA rate 1,661% of reported enrollment. CCSA remains concerned about A3 enrollment practices and the related ADA claims.
- **Failing to keep or provide required student documentation:** A3's responses were limited to a list of staff responsible for managing student-level documentation and sample processes and request forms. No documentation was provided demonstrating that the organization investigated the claim that A3 and the

affiliated schools we not properly managing student records, including report cards, transcripts and attendance practices. Given the lack of information provided, CCSA remains concerned with A3 and affiliated school's management of student records.

Given A3's lack of substantive responses to stated concerns, at this point, CCSA will be notifying the authorizers of A3 affiliated schools to evaluate these claims as part of their authorizer oversight responsibilities provided by state law. To our knowledge, here are the authorizers that currently oversee A3 affiliated schools that will be receiving notifications of these remaining concerns:

1. **Acton-Agua Dulce Unified School District** (*Valiant Academy of Los Angeles*)
2. **Bradley Union Elementary School District** (*Uplift California North Charter, Uplift California South Charter, and Uplift Monterey*)
3. **Cuyama Joint Unified** (*Valiant Santa Barbara, Uplift California Santa Barbara, and California STEAM Santa Barbara*)
4. **Dehesa Elementary School District** (*Valiant Academy of Southern California, California Academy of Sports Science, and University Prep*)
5. **Guerneville Elementary School District** (*California STEAM Sonoma II*)
6. **Meridian Elementary School District** (*California Prep Sutter K-7 and California Prep Sutter 8-12*)
7. **Raisin City Elementary** (*California Academy of Sports Science Fresno, California Vanguard Academy – Fresno and University Prep - Fresno*)
8. **Trona Joint Unified School District** (*California STEAM San Bernardino and University Prep - San Bernardino*)

If you have any questions, please let me know.



Willow Harrington

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