



Response to facts of findings for Santa Rosa City Schools from Pivot Charter School North Bay

We want to begin by expressing our appreciation to Santa Rosa City Schools for the thorough and fair analysis of the Pivot North Bay charter petition, as provided in the Findings of Fact. We value this level of review. It reflects the seriousness with which the District approaches its oversight responsibilities—an approach we deeply respect and welcome.

In that spirit, we are submitting the following responses to the Findings of Fact proactively. Rather than waiting for a future meeting or additional correspondence, we felt it was important to demonstrate our willingness to be held accountable and our commitment to addressing questions promptly and transparently. When an authorizer seeks clarification, we believe the appropriate response is to engage quickly, provide complete information, and work collaboratively to resolve concerns.

We have included the data and explanations requested in the Findings and are happy to provide further detail as needed. We also welcome the opportunity to meet and discuss any of these areas in greater depth or present additional documentation the District may find helpful.

Pivot North Bay is eager to continue building a strong partnership with Santa Rosa City Schools—one focused on ensuring that all students in our shared community have access to a robust, appropriate, and individualized educational experience. We look forward to working side-by-side with the District to support students and families and to uphold the highest standards of practice in the years ahead.

Below please find responses to the District's primary concerns in the Finding of Facts document.

Finding of Fact No. 4: The Petitioners are demonstrably likely to successfully implement the program, but the District notes it concerns below.

District Finding: Attendance and Enrollment

The most significant portion of a charter school's funding is based on ADA. The Renewal Petition assumes steady enrollment of 490 students for each of the five years

of the proposed renewal term. (See Renewal Petition, p. 59.) However, there is no clear explanation as to how this enrollment figure was derived, especially when considering historical enrollment trends for the charter school and its significant attrition rate. According to information gleaned from the California Department of Education's DataQuest system, Pivot's average enrollment over the last seven (7) years was 414 students—with the highest enrollment reaching 468 students in the 2019-2020 school year. Given that Pivot's projections for the renewal term are 22 students greater than its highest enrollment over a seven-year span, these figures do not appear to be grounded upon reasonable assumptions. An overstatement of revenue could compromise Pivot's fiscal position if its anticipated enrollment is not realized. This concern is further compounded by Pivot's high chronic absenteeism rate, which directly impacts funding. The District expects Pivot to reevaluate its revenue assumptions to ensure accuracy and avoid overstating revenues based on enrollment and attendance projections.

Pivot Response:

Pivot has seen enrollment over 480 students in the past, peaking at 487 students in December 2019. In recent years, there has been a significant increase in the number of students and families showing interest in enrolling at Pivot. However, due to staffing levels alone, Pivot has capped enrollment in the 440 student range for the past two school years, and has maintained large waitlists of over 100 students for the majority of those years. The combined number of enrolled students plus waitlisted students for the P-2 funding period was approximately 560 students on average for 2023-2024 and 2024-2025, which well exceeds the charter petition's assumed enrollment of 490 and demonstrates that demand for enrollment is sufficient to meet the projected enrollment. Pivot expects to enroll 490 students, as long as staffing levels projected in the petition budget are achieved and maintained.

For the past five years, Pivot's P-2 attendance rate has averaged 82.2%, and therefore the projected attendance rate of 81.0% in the charter petition budget is slightly conservative. Even though the school's chronic absenteeism rate is high, the relevant attendance factor for projecting most revenues is the average attendance rate for the P-2 funding period. The budgeted attendance rate is well substantiated by historical data.

District Finding: Reserve for Economic Uncertainties

A reserve for economic uncertainties ("REU") is the Unrestricted Ending Fund Balance divided by total expenditures. Public education industry standards recommend that an LEA of similar enrollment size maintain an REU equal to 3% of expenditures. Pivot has projected that it will maintain an REU well above 3%, with a fund balance in excess of 50%. There is no clear explanation supporting why Pivot maintains such a high fund balance, and it causes the District to question whether it is dedicating sufficient funds to support a robust and effective instructional program for the students enrolled in the charter school. If the Renewal Petition is approved, District staff will need a detailed explanation addressing the high fund balance.

Pivot Response: Reserve for Economic Uncertainties

Many charter school Boards, business managers, and support organizations agree that a Reserve for Economic Uncertainties of 3% is woefully inadequate for charter schools, which are often ineligible to access the tools and resources utilized by school districts for temporary cash flow support. Many charter schools, including Pivot, also lack collateral such as ownership of land and buildings, which makes it difficult to secure loans and other forms of financing. Additionally, charter schools may be subjected to severe consequences, up to and including action to revoke their charters, if financial problems such as cash flow issues arise. Among charter school business managers, a common recommendation is to maintain cash on hand equivalent to at least three months' worth of operating expenses. This is an average of 25% of annual expenses. As a result of conversations around this topic, Pivot's Governing Board issued guidance many years ago that the Ending Fund Balance should be maintained at a minimum of 20% of annual expense. While Ending Fund Balance is not equivalent to cash on hand, the two are highly correlated, and Pivot's Governing Board has chosen to assign its minimum requirement to the Ending Fund Balance.

In addition to the need for cash on hand, Pivot North Bay has been planning for the possibility that a large facilities project may be needed in the near future. After legal decisions and legislation imposed new restrictions on the location of charter school facilities for schools like Pivot, it was unclear whether Pivot would need to purchase or lease facilities in a different area of Santa Rosa. Consequently, Pivot has been setting aside additional funds to ensure sufficient capital would be available if such a facilities project was deemed necessary. Pivot leadership has been actively pursuing several options regarding facilities. Depending on how events unfold over the coming months, Pivot may still need to pursue a large-scale facilities project. However, if such a project is deemed unnecessary after all, Pivot will ensure the additional funds that had been set aside for facilities are reallocated to other student-facing programs and expenses as appropriate.

District Finding: Budget / MYP / Cash Flow

In reviewing Pivot's MYP, the District observed that the projected expenditures appear sufficient for employee salaries and benefits, instructional materials, equipment and supplies, facilities and utilities costs, technology, professional development and training, legal services, other outside contractors (e.g., back office), insurance, special education, oversight fees, and meal service. However, some of the budget items by object code are flat across the projection years with no explanation, including utilities (5510), janitorial and gardening (5515), waste (5525), water (5530), communications (5910), etc. In addition, business services (5812) is flat from fiscal year 2027 through 2030, but then it increases by 34%. Further, the budget item for special education contract instructors decreases by 27% from fiscal year 2027 to 2028 without explanation. The District seeks clarification regarding these inconsistencies from Pivot.

Pivot Response: Budget / MYP / Cash Flow

The District is correct that several line items in the Pivot North Bay budget reflect amounts that remain flat for multiple years. In general, these are items where historical expense data has not shown consistent increases year over year, and instead Pivot has seen total annual costs fluctuate up and down due to various factors. The amounts included in the forecast were set on the high side to ensure a sufficient cushion is available to cover expenses. Since the amounts are already on the high end of expected expense, it was deemed unnecessary to apply an additional annual increase for these items. The single increase for 5812 Business Services from 2029-30 to 2030-31 is an error that was not caught prior to the submission of the renewal petition. The projected amount for object code 5812 in 2030-31 should equal the annual amount listed for each of the first four years of the budget.

The decrease in projected expense from 2026-27 to 2027-28 for object code 5869 Special Education Contract Instructors is intentional and was determined by analyzing Pivot's student population and special education needs. Pivot has determined that certain high-cost items in this expense category will be reduced and/or eliminated starting in 2027-28 based on current students' special education placements, services, and expected graduation dates. The frequency with which Pivot has historically seen the need for these types of placements and services arise was also taken into consideration when determining the amount of expense reduction to include from 2026-27 to 2027-28.

Finding of Fact No. 6: The Renewal Petition provides reasonably comprehensive descriptions of the required elements set forth in Education Code section 47605.

District Findings: Special Education Program Description

Element 1 of the Renewal Petition is lacking detail in its description of the manner in which Pivot addresses the unique needs of students with disabilities. Specifically, while the Renewal Petition states that Pivot is a member of the El Dorado County Charter SELPA, it lacks documentation and references to specific SELPA policies and procedures. The Renewal Petition also does not include a reasonably comprehensive description of the continuum of placement options available to students with disabilities who cannot receive a free appropriate public education ("FAPE") in a nonclassroom-based setting.

Additionally, the Renewal Petition suggests that students within a 45-mile radius of the school's resource center receive services in person, while those living further away receive services virtually. However, use of this 45-mile distinction is improper. Whether a student participates virtually or in-person to receive special education services must be based on the student's unique educational needs and if such services can be appropriately accessed by the student. Further, this is a decision that must be determined by the student's individualized education program ("IEP") team and should not be treated as a standard policy or practice implemented by the charter school.

Virtual services may not be appropriate for some students, regardless of the proximity of their residence to the charter school's resource center.

Transportation is also a related service to be determined by an IEP team if it is required for the student to receive FAPE. The Renewal Petition states that students with "significant emotional challenges" living further than 45 miles away from the site would receive services virtually, which contradicts Pivot's assertion that such students would come in-person to the resource center.

Pivot Response:

We appreciate the District's thoughtful review of our special education program description. The legal requirement for the charter petition is to present a "reasonably comprehensive" description of how the Charter School will serve students with special needs. While Pivot North Bay asserts that its charter petition met that legal standard, we also agree that the petition does not fully capture the depth, compliance structure, and individualized decision-making processes that govern Pivot's special education practices, because this is a different standard than the law requires. We welcome the opportunity to clarify and expand on how Pivot serves students with disabilities and maintains full compliance with the Individuals with Disabilities Education Act (IDEA), the Education Code, and all El Dorado County Charter Special Education Local Plan Area (SELPA) policies, procedures, and governance requirements.

Below is a more detailed and comprehensive description of our special education program.

Enrollment and Non-Discrimination in Access to Special Education

Any student with any disability may enroll at Pivot, and we serve all students who qualify for special education under IDEA, regardless of disability category, severity of need, or proximity to the resource center. We do not limit access based on disability type, service needs, or anticipated placement. Every student is welcomed, served, and supported to the full extent of their IEP.

Immediate Procedures Upon Enrollment (CALPADS Verification & Interim IEP)

Upon enrollment, Pivot immediately verifies the student's status in CALPADS, reviewing the following fields to ensure continuity of services:

- Student with Disabilities Indicator
- Special Education Plan
- Special Education Services
- Special Education Meeting History
- Primary Disability and Secondary Disabilities

This allows us to assign an appropriate case manager *before the first day the student receives instruction*.

Implementation of Last Signed IEP

Pivot begins implementing the student's most recently signed IEP *immediately upon enrollment*, in accordance with IDEA and SELPA procedures.

Clarification Regarding "45-Mile Radius"

We appreciate the District's concern, and agree with your interpretation:

Service delivery method (virtual vs. in-person) must always be an individualized IEP team decision.

The language used in the petition created confusion. We do *not* have a policy requiring or restricting services based on mileage. Instead:

- We encourage in-person services whenever the IEP team determines the student benefits from face-to-face instruction with a credentialed Education Specialist.
- We also recognize that some students, particularly those with anxiety, emotional challenges, or living in remote counties, struggle to attend in person.
- For students who benefit from in-person services but cannot access transportation, the IEP team considers transportation as a related service, consistent with IDEA.

We want to be clear:

All decisions about service delivery, placement, and transportation are made solely by the IEP team based on the student's unique needs.

The 45-mile reference was not intended as a policy, rather more as a guideline to determine which students we expect to come to campus for services and we appreciate the opportunity to correct this. We have found that some students who live relatively close to the resource center are choosing not to attend in-person for services. We added the statement as a way to communicate that Pivot North Bay expects students who live nearby to receive services in-person.

District Finding: Procedures and Compliance

The District would like to see additional detail regarding the following processes and procedures of Pivot's special education program: interim placement procedures; procedures for addressing out-of-compliance IEPs; specific policies for responding to parental concerns or complaints related to special education services; IEP meeting procedures and implementation processes; a description of how the school implements special education services, including placement and services for students with more significant needs; and the relevant assessment processes and procedures (including an affirmation that a parent or legal guardian can request an assessment).

Pivot Response:

Interim IEP Meeting

Within 30 days, Pivot convenes an Interim IEP meeting to:

- Confirm services
- Verify accommodations and modifications
- Ensure the student can access FAPE in a personalized independent study model
- Determine whether any adjustments are needed
- Consider the continuum of placement options, including in-person and virtual access as appropriate

This process ensures full compliance with SELPA guidelines for interim placement.

IEP Meeting Procedures

Pivot convenes and documents all IEPs consistent with IDEA timelines:

- Annual IEPs
- Triennials
- 30-day interim IEPs
- Amendment meetings
- Parent-requested IEP meetings (held within required timelines)
- Emergency or review meetings as needed

(See attached compliance spreadsheet for last school year)

Parents are full participants. We offer:

- In-person or virtual meeting options
- Interpreter services
- Copies of assessments and all communication in parent-preferred languages

Procedures for Out-of-Compliance IEPs & Parent Concerns

Pivot has internal monitoring procedures that include:

- Weekly review of service logs
- Immediate action plans if service minutes fall behind
- Communication with families within 48 hours to resolve concerns
- SELPA support for dispute resolution and compliance monitoring

We maintain full alignment with SELPA dispute-resolution pathways.

Commitment to Full Compliance With SELPA Governance

Where our petition referenced compliance with “reasonable SELPA directives,” this was poor wording on our part. We comply fully with all SELPA governance documents, policies, procedures, and expectations as an LEA member.

District Finding: Service Delivery Model & Continuum of Services

The Renewal Petition also fails to specifically describe Pivot’s service delivery model, and includes conflicting statements on how students are grouped. For example, the Renewal Petition states that groups are based on both primary disability and specific learning disability. However, any decisions concerning a student’s placement, services, and supports should be based on the student’s special education eligibility and unique educational needs—not general groupings of students with disabilities.

Pivot Response:

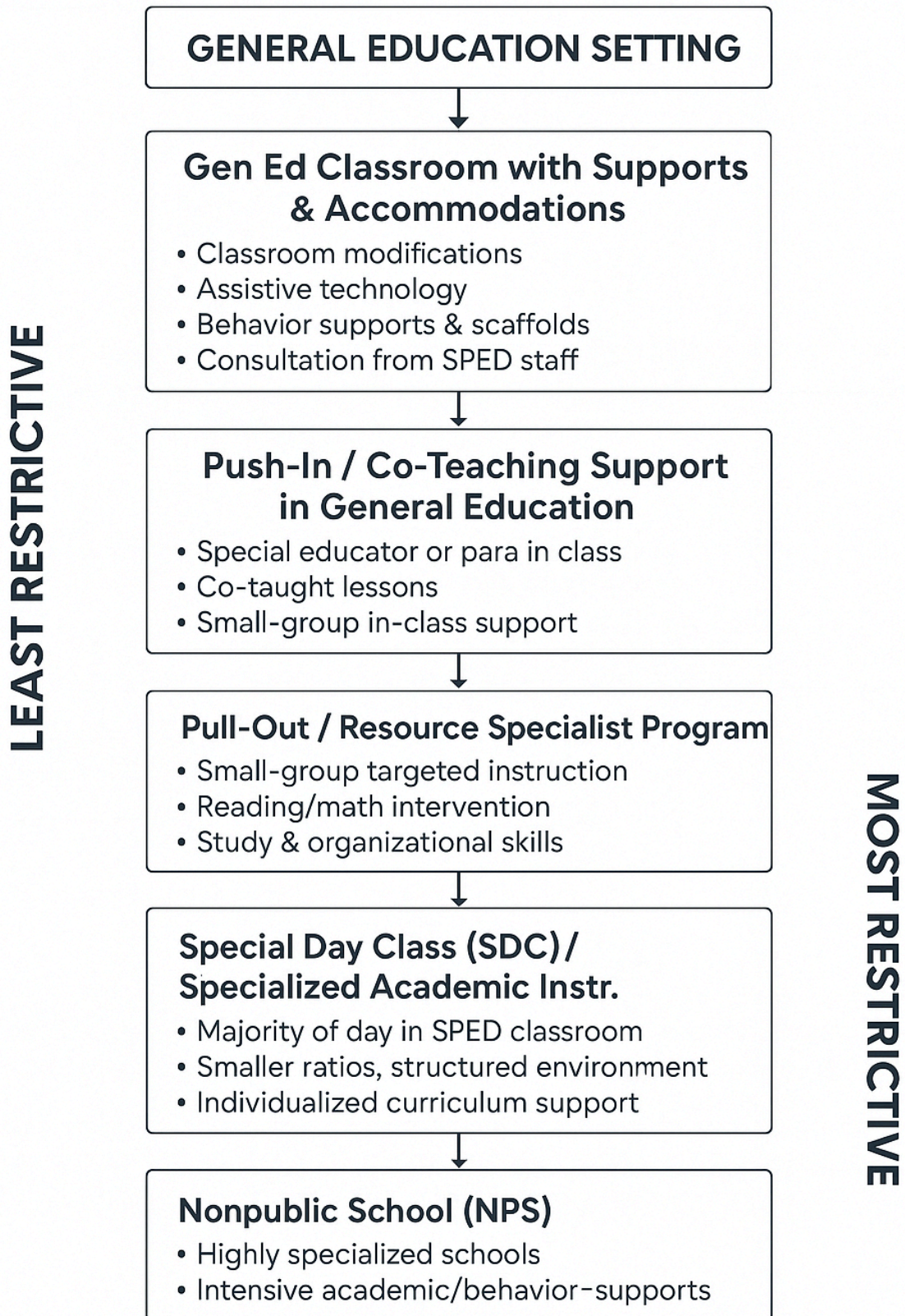
Service Delivery Model & Continuum of Services

Pivot provides the full continuum of placement options required under IDEA and SELPA local plans and policies. A diagram of Pivot’s continuum is below.

Students are served in:

- General education with accommodations and supports
- General education with push-in support
- Pull-out resource services in very small groups (typically 2–4 students)
- Specialized Academic Instruction for Mild-to-Moderate Support Needs (MMSN)
- Specialized instruction for Extensive Support Needs (ESN)
- Contracted services for related services (speech, OT, PT, counseling etc...)
- Placement in NPS or other more restrictive settings when the IEP team determines it is necessary to provide FAPE

CONTINUUM OF SERVICES FOR STUDENTS WITH DISABILITIES



Placement decisions are always based on the student's unique educational needs, not solely on the disability category.

District Finding: Assessment and Child Find

Additionally, the Petition does not include an adequate description of the appropriate procedures for child find activities. The Renewal Petition states that a student shall only be referred after general education resources have been considered, even though special education referrals and requests for assessment may come directly from teachers and parents without first exhausting general education interventions or supports. Pivot has a legal obligation to address and respond to referrals and requests for assessment accordingly under both federal and state law.

Pivot Response:

Assessment Processes & Child Find

Pivot follows SELPA assessment procedures, including:

- Parents may request an assessment at any time, verbally or in writing.
- Pivot responds with prior written notice and an assessment plan within **15 days**.
- Assessments are completed within **60 days** unless extensions are agreed upon.
- We conduct multidisciplinary, nondiscriminatory assessments.
- Child Find obligations exist continuously, not only after general education interventions.

District Finding: Description of Pivot's Special Education Programs

Moreover, the Renewal Petition does not include a reasonably comprehensive description of the essential components of a legally-compliant special education program under the Individuals with Disabilities Education Improvement Act of 2004 and related state law. Specifically, the Renewal Petition lacks a meaningful description of assessment procedures, the continuum of placement options to serve students in the least restrictive environment, the range of available services and supports, and parent engagement/participation in the development of the student's program. Oddly, the Renewal Petition also states that it complies with "reasonable SELPA directives." However, as a local educational agency member of the SELPA, the District would expect Pivot to ensure compliance with all SELPA directives, without using this qualifier of "reasonable."

Pivot Response:

Description of Pivot's Special Education Programs

Mild to Moderate Support Needs Program

Designed for students with:

- SLD
- Mild Intellectual Disability
- Autism (mild/moderate)
- Emotional Disturbance
- OHI/ADHD

Supports include:

- Small-group pull-out (2–4 students)
- 2-3 sessions weekly with credentialed specialists
- Grade-level access with accommodations and modifications
- Organizational skills instruction
- Social-emotional support integrated into instruction

Extensive Support Needs Program

Designed for students with:

- Severe or moderate-to-severe Autism
- Multiple Disabilities
- Deafblindness
- Significant ID
- Severe ED requiring intensive support

Supports include:

- Highly individualized instruction
- Functional skills instruction
- Communication and adaptive behavior supports
- A specialized curriculum (TeachTown) selected for its suitability in independent study+structured intervention models
- Frequent virtual or in-person sessions based on the IEP team's decisions

6. Related Services & Contractors

Pivot contracts with appropriately credentialed and licensed providers for:

- Speech-Language Pathology
- Occupational Therapy
- Physical Therapy

- Behavioral assessment and BIP development
- Vision and hearing services
- Deaf/Hard of Hearing services
- Orientation and mobility

All contractors adhere to:

- SELPA guidelines
- Education Code requirements
- Credentialing requirements
- IEP service minutes and delivery models

Pivot monitors provider logs weekly to ensure compliance.

District Finding: Transportation

Transportation is also a related service to be determined by an IEP team if it is required for the student to receive FAPE. The Renewal Petition states that students with “significant emotional challenges” living further than 45 miles away from the site would receive services virtually, which contradicts Pivot’s assertion that such students would come in-person to the resource center.

Pivot Response:

We appreciate the District’s clarification regarding transportation as a related service and agree that decisions regarding service modality and transportation must be made solely through the IEP team based on each student’s unique needs. We want to provide additional detail regarding our actual practices, which were not clearly explained in the original petition.

Transportation Services and Provider

Pivot contracts with West County Transportation Agency, a public transportation provider, to transport students with disabilities when the IEP team determines transportation is necessary for the student to access FAPE. We maintain an ongoing contract with WCTA specifically so transportation is always available when identified in the IEP.

Clarification Regarding In-Person Access

Pivot does not have any policy that limits transportation based on distance from the resource center. The reference to a 45-mile radius in the original petition was not intended to function as a rule or eligibility criterion. The reality is that many families beyond that distance voluntarily decline in-person services due to travel burden, even when transportation is offered.

Our Actual Practice

- If the IEP team determines that in-person services are necessary, Pivot will transport the student regardless of distance.
- If a student or family declines in-person services, we honor that choice—as required—and provide all special education services virtually, delivered by credentialed staff or contracted specialists.

Commitment to Offering In-Person Services

We want to emphasize that Pivot strongly supports and encourages in-person service delivery whenever the IEP team deems it beneficial. Many of our students—particularly those with anxiety, emotional needs, or long travel distances—are reluctant to attend in person even when transportation is available. However:

We never require students to come in person, and we cannot condition services on attendance at the resource center.

Regardless of whether students choose in-person or virtual services, Pivot fully implements all required IEP service minutes and supports.

District Finding: Eligibility, Staffing and Vendors

Given these omissions, District staff seeks additional data regarding the number of students within the various eligibility categories, as well as IEP timeline compliance data for the previous charter term. Further, the District requests additional clarity on Pivot's special education staffing. Specifically, Pivot states that it has three Education Specialists serving students at the resource center, but this does not indicate how students are served remotely (or whether these same Education Specialists provide virtual service delivery). While the Renewal Petition references services provided by outside vendors, it lacks detail on the types of services provided, as well as the processes and procedures for sharing student information with vendors.

Pivot Response: Eligibility, Staffing and Vendors

Please click the following link to ask for access to the [extensive spreadsheet of the SEIS compliance report](#). Of our 133 students with IEPs, only 10 instances of noncompliance were directly attributable to omissions on our part. Many students enroll with Pivot North Bay already out of compliance from prior placements and it is a scramble to “catch up” as soon as possible, when the IEP is already out of compliance at the time of enrollment. Some students experience unavoidable delays (evaluation scheduling or parent consent), but in all other cases, services were initiated or triennial reviews completed within the same school year as required by law. We have addressed each of these 10 cases and implemented additional oversight to prevent recurrence.

Disability categories for Pivot students who currently qualify for special education services, as of December 2025 are below. We are happy to provide other years as well.

Eligibility Category	Number of Students
Specific Learning Disability (SLD)	54
Other Health Impairment (OHI)	41
Autism (Aut)	12
Emotional Disturbance (ED)	7
Intellectual Disability (ID)	2
Speech/Language Impairment (SLI)	5
Multiple Disabilities (MD)	1
Traumatic Brain Injury (TBI)	1

Staffing:

All Education Specialists provide services both on site and remotely to ensure students receive support in the modality that best meets their needs. For students receiving virtual services, Pivot may assign an Education Specialist from another Pivot campus, as geographic location does not impact the delivery of virtual instruction. When an Education Specialist from another Pivot school is designated to serve Pivot North Bay students, the proportional FTE associated with those services is allocated to the Pivot North Bay budget to ensure accurate financial reporting and resource alignment. The following is the FTE staffing levels for Pivot North Bay special education services as of the writing of this document.

Education Specialists: 4.7 (2 of which are on site in Santa Rosa)

Speech (through vendors): 1

Occupational Therapists (through vendors): .25

Educational Psychologists: 1

Counselors: 2.75 (2 FTE on site)

Special Education Vendors:

These are the vendors Pivot North Bay has utilized in the last several years:

Vendor Name	Description of Services
Adriana San Millan School Psychology	School Psychologist & assessment services (before we brought these services in-house to be completed by employees)

Anova Education and Behavior Consultation, Inc.	Student NPS placement beginning in 2024-25, ongoing in 2025-26
Correia, Jack Stanley	School Psychologist & assessment services (before we brought these services in-house to be completed by employees)
Haynes Family of Programs	Occupational therapy services for one student - used this provider to ensure continuity with the student, since they had a provider at Haynes who worked well with the student
Jacobsen-McCarthy, Michelle	School Psychologist & assessment services (before we brought these services in-house to be completed by employees)
Maxim Healthcare Services	Nursing services - we rarely need outside nursing services, but we used Maxim for a student with severe needs (trach tube, etc) to ensure they could participate in our site-based programs safely
New Directions	Student NPS placement 2020-21 and 2021-22
Presence Learning, Inc.	Used to be one of our primary service providers - mostly speech/language and some occupational therapy
Redwood Pediatric Therapy Associates, Inc.	Occupational therapy services for a small number of students
River Springs Charter School	Special Day Class program
Sonoma County Office of Education	Deaf & hard of hearing services and vision services
Specialized Therapy Services, Inc	One of our primary services providers - mostly speech/language, occupational therapy
The Upward Bound School Inc	One of our primary service providers in recent years - mainly assisting with Education Specialist services when we've been understaffed, but they also have provided some speech/language, occupational therapy, and counseling services
West County Transportation Agency	Transportation to/from NPS for two student placements (New Directions and Anova)

District Findings: Measurable Student Outcomes

The Renewal Petition does not include sufficient detail regarding Pivot's measurable student outcomes for students on both a schoolwide basis and for all significant student groups. Rather than integrate a detailed summary in the Renewal Petition of the charter school's annual goals, actions to achieve those goals, and measurable student

outcomes, Pivot simply refers to its local control and accountability plan (“LCAP”) for further information. District staff expected to see a thoughtful presentation and analysis of those measurable student outcomes in the Renewal Petition.

Pivot Response: Measurable Student Outcomes

The Charter School would need more detail on what exactly the District is interested in seeing. The law requires charter petitions to contain a reasonably comprehensive description of goals, actions, and outcomes, schoolwide and for all numerically significant student subgroups, in the State Priorities. This requirement precisely maps onto what the LCAP requires. Thus to ease the burden for all, Pivot North Bay, like most charter schools, utilized its LCAP to meet the charter petition requirement. The Charter School provides a detailed review of the progress toward our LCAP goals each Board meeting and can provide this analysis for the District as well.

District Findings: Independent Study Requirements

The Renewal Petition generally includes a reasonably comprehensive description of Pivot’s understanding and application of the independent study requirements set forth in the Education Code. However, as a nonclassroom-based program that implements an independent study model, the Renewal Petition should have provided a more robust explanation of the policies, procedures, and practices that Pivot implements as part of this instructional model, in addition to a copy of Pivot’s master independent study agreement.

Pivot Response: Independent Study Requirements

The Charter School would appreciate additional clarification regarding which specific policies and procedures the District wishes to review. Pivot maintains two Parent/Guardian Policy Manuals—one 35-page graphic version and a more comprehensive 165-page version—as well as a 141-page Teacher Independent Study Handbook. The charter petition itself outlines daily expectations for students, program structure and schedules, and the ways in which teachers provide instruction and support.

We are fully prepared to provide any additional detail the District may need and would welcome guidance on the particular sections or components of our program and policies that the District would like us to expand upon.

Please see attached copy of Pivot’s Independent Study Written Agreement (Master Agreement)

In closing, thank you again for the thoughtful analysis and the opportunity to provide clarification. We look forward to continuing to respond promptly and transparently to any questions the District may have. Our hope is that this exchange serves as the first of

many examples that we are not only committed to *talking* about collaboration, accountability, and responsiveness—but truly *living* those values in practice.

We are excited about the possibility of partnering with Santa Rosa City Schools and working together to support students across our community.



lc_id Master Agreement for Independent Study

Student: student_name
AKA Name: student_akaname
Student Number: st_number
Address: street1
Location: citystatezip
1st Phone Number: homephone
DOB: 12/09/2025
Program Placement: tr_gradtypes_id

Contract Duration: contractterm
Beginning Date: 12/09/2025
End Date: 12/09/2025
Year: schoolyear
2nd Phone Number: cellphone
Grade Level:
School for Classroom Option: altschool

Objectives/ Course Credits (high school)/ Other Measures of Academic Accomplishment (elementary/middle):

The student will complete and make satisfactory progress on the objectives set forth in all courses assigned to them through their online curriculum portal. All course objectives will be consistent with the established program's curriculum and are consistent with program standards. All major objectives, activities and standards and methods of evaluation are outlined in the online course assignments for every grade level.

As a measure of academic accomplishment for elementary and middle school students, it is expected that all elementary and middle school students complete, at minimum, section A and section B (first and second semester) of courses assigned in the following content areas: Mathematics, Science, Language Arts, Social Science and Physical Education. All high school students will complete 30 credits each semester or as necessary to complete Pivot Charter School Board-approved graduation requirements.

Methods of Study:

Specific methods of study are specified in the online curriculum courses and will vary depending on grade level and course content. Examples of methods of study for the student will include: participation in synchronous and asynchronous instruction online and at the school site, essay and short answer writing, research papers, independent reading, online activities, problem solving, worksheets, study projects, drill & practice, experiential learning, computerized curriculum, web/internet research, field trips, learning center courses, and online workshops.

Specific Resources:

The school will provide appropriate instructional materials and personnel necessary to the achievement of the objectives and must include resources that are normally available to all students on the same terms as the terms on which they are available to all. These resources shall include confirming or providing access to all pupils to the connectivity and devices adequate to participate in the educational program and complete assigned work.

Methods of Evaluation:

Academic evaluations will be conducted electronically through the portal and by Pivot Charter School staff. Acceptable methods of evaluation include, but are not limited to: teacher-made tests, online meetings and family conferences, progress/report cards, chapter/unit tests, work samples, observations, portfolios, state standards testing, learning journals, presentations, quizzes, labs, final exams, benchmark assessments, and written work.

Manner, Time, Frequency and Place for Submitting Assignments and Reporting Academic Progress and for Communicating with a Parent or Guardian Regarding a Pupil's Academic Progress:

Students will complete their work independently in the online curriculum and submit all work to their teacher through the online systems on the dates established by the teacher and the online systems as the due date for the work completion, unless otherwise specified in a Student Success Team Document or other educational support document.

Students will meet with their teacher weekly in small groups such as homerooms or one on one online and in person at the School's resource center as assigned. These meetings will occur during school hours, between 8 a.m. and 4 p.m. on school days, at times scheduled by the School. Parents/guardians are informed of student academic progress at least monthly during formal meetings in person, over video or phone conference with the supervising teacher of record. Communication often occurs more frequently in the form of automated emails generated and sent by curriculum systems, communication directly from the supervising teacher via email, phone, text, mail, or virtual meetings, and additional support meetings like SSTs, IEPs, etc. Parents/Guardians and students are expected to respond to emails, texts and phone calls from the teacher within 24 school hours. The majority of the communication

from the teacher will be through email and text. Parents and Guardians must ensure they have a working email and check it at least once every school day and inform the school if their email address. Parents and Guardians are expected to watch and respond to prompts in the Parent Guardian training each year.

Voluntary Statement:

It is understood that independent study is an optional educational alternative in which no pupil may be required to participate. In the case of a pupil who is referred or assigned to any school, class, or program pursuant to Education Code Section 48915 or 48917, instruction may be provided for a student through independent study only if the student is offered the alternative of classroom instruction.

Board Policies:

The following written policies apply to all enrolled pupils participating in independent study at all Pivot Charter Schools, and have been adopted by the Board for implementation at the School:

1. **Supervision:** Each pupil's independent study shall be coordinated, carried out, monitored, and evaluated under the general supervision of an assigned certificated
2. **Assignment Timeline:** For pupils in all grade levels offered by the School, the maximum length of time that may elapse between the time an assignment is made and the date by which the pupil must complete the assigned work shall be twenty (20) school days maximum.
3. **Missed Assignments:** When any pupil fails to complete 15 (fifteen) assignments during any period of twenty (20) school days, the School shall conduct an evaluation to determine whether it is in the best interests of the pupil to remain in independent study. A written record of the findings of any evaluation conducted pursuant to this policy shall be treated as a mandatory interim pupil record. This record shall be maintained for a period of three years from the date of the evaluation and if the pupil transfers to another California public school, the record shall be forwarded to that school.
4. **Satisfactory Progress:** When a pupil fails to demonstrate satisfactory educational progress, the School shall conduct an evaluation to determine whether it is in the best interests of the pupil to remain in independent study. A written record of the findings of any evaluation conducted pursuant to this policy shall be treated as a mandatory interim pupil record. This record shall be maintained for a period of three years from the date of the evaluation and if the pupil transfers to another California public school, the record shall be forwarded to that school. Pursuant to Education Code Section 51747, satisfactory educational progress shall be evaluated and determined based on all of the following indicators:
 - a. The pupil's achievement and engagement in the independent study program, as indicated by the pupil's performance on applicable pupil-level measures of pupil achievement and pupil engagement specified in Education Code Section 52060.
 - b. The completion of assignments, assessments, or other indicators that evidence that the pupil is working on assignments.
 - c. Learning required concepts, as determined by the supervising teacher.
 - d. Progressing toward successful completion of the course of study or individual course, as determined by the supervising teacher.
 - e. The School maintains a Multi-Tiered System of Support Policy, which outlines specific criteria for each of the indicators above.

Supports For Students with Additional Needs:

The Charter School shall utilize its MTSS Procedures to address the needs of pupils who are not performing at grade level, or who need support in other areas, such as English Learners, pupils in foster care or pupils who are experiencing homelessness, and/or pupils requiring mental health support. The Charter School complies with the Individuals with Disabilities in Education Act ("IDEA") and is committed to meeting the needs of individuals with exceptional needs in order to be consistent with the pupil's individualized education program ("IEP"). Policies, procedures, and guidelines are in place to ensure that pupils are identified, assessed, and provided a free appropriate public education in the least restrictive environment. The school complies with Section 504 of the federal Rehabilitation act of 1973 (29 U.S.C. Sec. 794) and is committed to providing equivalent access to and providing a free appropriate public education to all students with disabilities.

I have read and I understand the terms of this agreement, and agree to all provisions set forth.

Student Signature	Date
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Parent/Guardian/Caregiver Signature	Date
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Supervising Teacher Signature	Date
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Special Education Teacher Signature	Date
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Other Signature	Date
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Other Signature	Date
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Other Signature	Date
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