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Superintendent

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Assistant Superintendent

Perquimans County Schools
P. O. Box 337
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August 27, 2021

Mr. Dave Machado, Director
Office of Charter Schools
NC Department of Public Instruction

Dear Mr. Machado:

Thank you for giving us the opportunity to respond to the new request for the Elaine Riddick Charter School in Perquimans County. We believe that the opening of this school will not only be detrimental to our school system, but more importantly to the children who may be enrolled there. In reading the application, we found many discrepancies in the data provided and concerns about the application itself. This letter shares our concerns.

Perquimans County Schools is composed of four schools that currently serve 1,703 students as of August 25, 2021 in PK-12. Our enrollment numbers have not been decreasing as stated in the Elaine Riddick application, but in fact have increased each year since 2016 with the exception of 2020 when enrollment decreased slightly due to COVID. This year, we have the highest number of students enrolled in our school system since 2015. Our student population is approximately 24% African American, 4.2% Hispanic, 5.5% Multi-Racial, and 66% White. Students qualifying for free and reduced lunch in grades PK-2 averages 62.5% and grades 3-5 averages 54% annually. Our Exceptional Children population averages from 16 to 18% of our total school system population each year. Perquimans County has no low performing schools.

If the Elaine Riddick Charter were to open in our rural area, Perquimans County Schools projects a loss of \$591,120 in a combination of direct and indirect funding streams from state, federal and local resources in their first year of operation. With an additional grade level being added each year, this loss of funding is projected to increase by approximately \$118,224 each year. By year five of the charter school opening, Perquimans County Schools projects approximate annual losses to total \$1,064,016 from all funding sources. Unfortunately, a fiscal loss of this magnitude could result in a Reduction in Force (RIF). According to County Manager Frank Heath, this loss of funding could have a substantial impact on the tax rate of all citizens of Perquimans County.

Perquimans County Schools, in 2021-2022, has lost 55 students to the Northeast Academy for Aerospace and Advanced Technologies (NEAAAT) Charter School located in Elizabeth City, North Carolina. The loss of an additional 75 students as projected to a competing charter school will create significant hardships in service areas that require per pupil funding allotments. The transportation department will lose significant funding due to the reduction in student enrollment but will be required to travel the entire county. Other than FY 2020-2021 (for which school closures reduced transportation costs), our state transportation funding does not cover the total

Mr. Dave Machado
August 27, 2021
Page 2

transportation cost – local funding of approximately \$110,000 is usually required to help cover the total cost. With an additional charter school, if routes remain the same (fewer students riding, but covering the same area), the Transportation department's efficiency rating would suffer. This is based on miles traveled versus how many students we transport. If buses are running the same route (mileage) but transporting fewer students, this has a negative fiscal impact. In the event our bus routes are reduced, drivers would work fewer hours resulting in less fiscal incomes and the likelihood of not driving for Perquimans County Schools. This could result in an even greater bus driver shortage than what we currently have.

Considering School Nutrition, Perquimans County Schools would lose funding for each student who eats school meals, and this impact increases if the student qualifies for free and reduced meals. A reduction in 75 students would, on average, cost the district between \$75,000 to \$90,000 annually.

The Elaine Riddick Charter application stated that in Perquimans County, there is currently a 32.5 point achievement gap between White and Black students for "College and Career Readiness" as measured by EOG's for grades 3-8. The application also states that this percentage exceeds the State and National standard. Contrary to this information, the gap between black and white students is actually smaller at Hertford Grammar School than the state. Based on college and career readiness data reported by the state, the gap between white and black students on grades 3-8 reading assessments was 31.1% while the gap at Hertford Grammar School was 26%. In math, the college and career state gap between white and black students was 31.3% while at Hertford Grammar the gap was only 29.4%. According to state grade level proficiency data, there is a 30.3% proficiency gap between black and white students in reading grades 3-8, while at Hertford Grammar the gap is only 23.3%. In addition, the state gap in math grades 3-8 is 31.6% while at Hertford Grammar the gap is only 25.4%.

The Elaine Riddick Charter application states that the students with disabilities subgroup in the local school district is deemed "Chronically Underperforming" based upon the N.C. Accountability Model. It goes on to say, of the four Perquimans County Schools, all four are Targeted School Improvement (TSI) schools under Title I of the Elementary and Secondary Education Act (ESEA). This statement is true but does not make Perquimans County "chronically underperforming" as evidenced by the number of schools across the state who hold the same designation. There are 1,463 public schools that serve grades K-8 on the TSI list due to the students with disabilities subgroup. In fact, Torchlight Academy, operated by the same company who will be operating Elaine Riddick Charter, is also on the TSI list for students with disabilities. If this definition is true, according to the application this would also make Torchlight Academy "chronically underperforming" as well. In addition, Three Rivers Academy,

Mr. Dave Machado
August 27, 2021
Page 3

also operated by Torchlight, is on the TSI list for black and economically disadvantaged students making them "chronically underperforming" by their own definition in the subgroups they wish to serve in Perquimans County at Elaine Riddick Charter.

In reviewing the Elaine Riddick Charter School application, we also have concerns about the building and the services they claim will be provided and we know our students in Perquimans County need. EC staffing of only 1 teacher to case-manage *and serve* a 14% population (20-32 students) is grossly insufficient, even more so when considered in relation to their submitted daily schedules. There is limited room for individualized education and inclusion services across grade levels would be impossible. For example, how would a 2nd grade, 3rd grade, and 4th grade student all receive 30 minutes of math and 30 minutes of reading services three times per week? How would they address that high potentiality while also providing for a student requiring just-in-time behavioral interventions and another that is best served for 90-180 minutes a day in a more restrictive setting? They are very clearly unable to serve the targeted population at the percentage they project under "light" service delivery requirements, and they are wholly unable to appropriately serve a student who may be in need of a shower, diaper changes, etc. Who will even assist with medication administrations for students of that age bracket in an area with such high rates of serious health conditions, like diabetes?

The application also does not have a sound contingency plan for specialized transportation for handicapped children or those who qualify as Homeless. Their budget states that they will "move funds from contingency", but the only contingency funding set aside is \$25,000. The transportation plan overall seems to be inadequate.

The Elaine Riddick Charter application states that the extent of English Language Learning services appears to be lacking in Perquimans; however, 46.7% of Hispanic students in Perquimans County Schools were at the College and Career readiness level in reading in grades 3-8. Only 31.7% of the Hispanic students were college and career ready according to state averages. Perquimans County Schools Hispanic population was 43.3% college and career ready in math grades 3-8 while the state Hispanic average was only 31.7%. Our ELL subgroup is too small to have reportable data and therefore we are unable to compare that average to the state.

According to the Elaine Riddick Charter Application, both Perquimans Central School and Hertford Grammar have had declining performance scores over the past several years. Over the past six years, Hertford Grammar has maintained an average school performance grade of 65.3 earning 4 Cs and 2 Bs. During this same time period, the average school performance grade at Torchlight Academy was 53. During this time, the school earned 4 Cs, 1 D and an F. With only five years of data for Three Rivers

Mr. Dave Machado
August 27, 2021
Page 4

Academy, also operated by Torchlight, the average school performance grade was 34 including 2 Ds and 3 Fs.

In addition, the Elaine Riddick Charter application states the singular school of choice for middle school in Pasquotank County is predominantly white, affluent, and does not appear to provide free transportation - a key component in providing access to all students. This statement is yet another example of inaccuracy. The school of choice referenced is NEAAAT Charter School which does provide free transportation and serves a population where approximately 40% of its students would qualify for free or reduced lunch, 10% are Exceptional Children, and 66% are White.

Perquimans County Schools remains concerned about the enrollment claims of the Elaine Riddick Charter School. At the final RTO review on July 7, 2020, Elaine Riddick Charter School indicated that they had 111 applications for enrollment and 104 students had been accepted with the enrollment process complete. However, no withdrawal requests from Perquimans County Schools had occurred at this time. On August 11, 2020, Perquimans Central School received 27 record requests from Elaine Riddick which was the day before the August 12, 2020 special called meeting of the Charter School Office Board. Since no withdrawals had been requested from parents in our school system, the assistant principal of Perquimans Central School began calling the parents of the requests received. After calling the first 10 parents who indicated they had not enrolled or requested enrollment in the Elaine Riddick Charter School, the school was directed not to send the records until confirmation was received from all parents. No requests were received by Hertford Grammar School. The statement that 104 students had been accepted and the enrollment process completed at the July 7, 2020 RTO meeting could not have been true for Perquimans County and was still not true in August of 2020. In August of 2021, Perquimans County Schools had not received any record requests or withdrawals for students wishing to enroll in the Elaine Riddick Charter School. This sheds doubt on their 150 confirmed enrollments for the 2021-2022 school year.

As for facilities contingencies, page 149 states that "...Perquimans County had no available lease space suitable for a school". The same management company and board were provided 3 years in which to ready a suitable facility or alternate, and they were unable to do so. The current budget is insufficient for the installation, water/sewer and electrical connections, and lease of the number of modular units that would be required under the stated educational, operational, and facilities plans, especially when considering that at least some of the units would have to be "piped" for water/sewage and additional technical infrastructure installed (i.e. connectivity).

Our own efforts clearly show that hiring licensed school staff in this region is exceptionally difficult, even when a school offers TSERS, State Health Plan, and flexible benefits. Elaine Riddick does not plan to offer TSERS or the Plan, and intends to close the gap by offering up to 10% over local salaries. The stated principal/school leader salary is over \$8,000 less than the state's base salary of \$68,124, or 12% *lower*, without state benefits, and the individual is tasked with district-level compliance, in addition to all of the challenges associated with opening a new organization. The fact that the applicant board was unable to fully staff the school after 3 years of planning serves as additional supporting evidence that the salary structure is insufficient for this high needs, rural area and the high needs, rural population the board purports to target.

The Elaine Riddick Charter stated they could not complete opening requirements in August of 2020 due to COVID while Perquimans County Schools opened its doors to in person learning on August 16, 2020 and remained open the entire school year. On March 16, 2020, Perquimans County Schools transitioned seamlessly to remote learning in response to the COVID-19 school closure. All students were served remotely either through technology or paper packets and over 60,000 meals were served to the students in our community. Over the past year and a half, our students and staff have continued to excel. Some of these accomplishments are as follows:

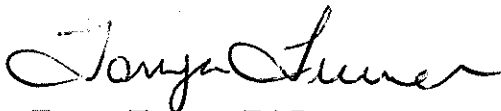
- Recognized as a National Beta District of Distinction
- Recognized a second year in a row as a National Board Certified District of Distinction
- The band program was awarded a \$50,000 grant from the Gloria and Arthur Konig Foundation to fund new instruments at its middle and high school.
- The middle school won a \$100,000 Don't Quit Campaign from the Governor to build a state of the art fitness center.
- The transportation department got the best bus inspection in school system history.
- Was in the top 10 in the state for CTE credentials earned
- K-2 teacher named as the NC Farm Bureau Ag Teacher of the Year
- High school math NCASCD Teacher of excellence for the state of NC
- Baseball team won the 1A state championship
- Volleyball team was the Eastern Regional runners up
- Athletic director was named the NCHSAA campus captain.
- Middle school was awarded the Albemarle Athletic Conference Cup for the first time in this little school system's history
- In 2019-2020, the graduation rate was the highest since 2013-2014 at 92.9%.
- The CTE director was named director and CIMC of the year for the region.

Mr. Dave Machado
August 27, 2021
Page 6

- The FFA celebrated 90 years of existence and the Ag program was awarded \$15,000 for Building Welders through America's Farmers Grow Rural Education.
- Wavy 10 highlighted school district's teachers
- EDNC featured the school system several times in their online journal.
- When spectators were limited at sporting events, cameras were installed and Facebook was used to stream games live for parents, family and friends who could not attend.
- Over 80% of the AP calculus students earned college credit
- Created online hybrid classrooms for face to face and remote students to learn simultaneously
- Distributed chrome books to all students K-12 and hotspots to any students needing internet access

In closing, the claims made by Elaine Riddick Charter are very inaccurate and misleading. Perquimans County Schools have shown a tradition of continued success in serving ALL students PK-12. Our increasing enrollment indicates that others are recognizing this as well and choosing our school system to educate their children. The financial impact of the opening of the Elaine Riddick Charter School could negatively impact the many positive things that are happening in Perquimans County Schools. Thank you for giving us the opportunity to share our concerns about the possible opening of this charter school and a voice in the data presented in their application.

Sincerely,



Tanya Turner, Ed.D.
Superintendent