Date of Hearing: April 30, 2025

ASSEMBLY COMMITTEE ON EDUCATION Al Muratsuchi, Chair AB 84 (Muratsuchi) – As Amended March 19, 2024

SUBJECT: School accountability: audits: charter schools: data systems

SUMMARY: Establishes new requirements for nonclassroom based (NCB) charter schools in the areas of auditing and accounting standards, the funding determination process, contracting process, authorization of NCB charters by small districts, and the authorizer oversight process, as specified. Specifically, **this bill**:

Audit and Accounting Standards

- 1) Requires training for local educational agency (LEA) auditors, requires LEA audits to be peer reviewed, and requires the State Controller's Office (SCO) to perform quality control reviews, as specified.
- 2) Requires the K-12 audit guide to include schedules on pupil enrollment, pupil attendance, the 25 largest monetary transfers, pupil to teacher ratios, related loans, the expense of education, charter oversight expenses; and include audit instructions on sample section, materiality, enrollment, charter authority input, related parties, and classroom-based instruction verification.
- 3) Requires charter schools to follow the same audit procedures and audit schedules, and use the same Standardized Account Code Structure (SACS), as school districts.
- 4) Creates the Office of Inspector General at the California Department of Education (CDE), to be appointed by the Governor.

NCB Charter School Funding Determination

- 5) Establishes a funding formula for NCB charter schools based on the amount of in-classroom instruction provided to pupils as follows:
 - a) Pupils engaged in classroom-based instruction for at least 75% of their attendance, generate 100% attendance for state apportionment;
 - b) Pupils engaged in classroom-based instruction for between 60% and 74% of their attendance, generate 92.5% attendance for state apportionment;
 - c) Pupils engaged in classroom-based instruction for between 40% and 59% of their attendance, generate 85% attendance for state apportionment;
 - d) Pupils engaged in classroom-based instruction for between 20% and 39% of their attendance, generate 77.5% attendance for state apportionment; and

e) Pupils engaged in classroom-based instruction for between 0% and 19% of their attendance, generate 70% attendance for state apportionment.

Charter School Contracts

- 6) Prohibits private religious organizations or schools from serving as contractors.
- 7) Requires charter schools to participate in competitive bidding of contracts in the same manner as school districts.
- 8) Prohibits contracts from being calculated as a percentage of charter school apportionment.
- 9) Prohibits schools from paying for instructional programs not offered by a credentialed teacher.
- 10) Prohibits employee compensation based on vendor contracts, student attendance or course completion.

Staff Training

11) Requires staff that provide direct services to students (School Counselors and Psychologists, School Nurses, Librarians, and Student Attendance Clerks), administrators, as well as contractors who provide direct services to students that count toward instructional minutes to hold an appropriate credential, in the same manner as school districts.

Pupil Attendance Data Study

12) Requires the CDE to study the feasibility of connecting the California Longitudinal Pupil Achievement Data System (CALPADS) and the attendance accounting system.

Pupil to Teacher Ratios

- 13) Authorizes charter schools to calculate pupil-to-teacher ratios in independent study programs by one of the following methods, which currently exist for school districts and county offices of education (COEs):
 - a) A 25 to 1 pupil-to-teacher ratio;
 - b) An alternative pupil-to-teacher ratio negotiated as part of a collective bargaining agreement; or
 - c) The prior year pupil-to-teacher ratio at programs operated by the high school or unified school district with the largest average daily attendance of pupils in the county or the collectively bargained alternative ratio used by that high school or unified school district in the prior year.

School District Authorizers

14) Permits a NCB charter school to be authorized as follows:

- a) School districts < 2,500 in Average Daily Attendance (ADA) may authorize NCB charters up to 100% of district ADA;
- b) School districts of 2,500-5,000 ADA may authorize NCB charters up to 2,500 ADA; and
- c) School districts of 5,000-10,000 ADA may authorize NCB charters up to 50% of district ADA.
- 15) Directs the State Board of Education (SBE) to reassign NCB charters that are authorized by small districts to larger district authorizers within the county or the COE, upon their next renewal.
- 16) Includes in the definition of state receivership the probationary period following loan repayment for school districts in qualified budget status.

Authorizer Oversight and Oversight Fees for Charter Schools

- 17) Establishes the Charter Authorizing Support Team at the Fiscal Crisis and Management Assistance Team (FCMAT).
- 18) Requires charter school authorizers to annually perform the following oversight responsibilities for charter schools:
 - a) Verify the percentage of pupils participating in classroom-based instruction.
 - b) Annually verify the ADA-to-certificated-teacher ratio used by the charter school.
 - c) Verify average daily attendance at the first, second, and annual principal apportionment reporting, including subsequent corrected reports, after performing reasonable testing of monthly enrollment and monthly attendance reports to be submitted to the chartering authority by the charter school, to determine enrollment and attendance trends and averages; and
 - d) Perform audit compliance monitoring.
- 19) Permits a charter authorizer to charge oversight fees not to exceed actual costs up to 2% for the 2027-28 fiscal year; and, effective July 1, 2028, permits a charter authorizer to charge oversight fees not to exceed actual costs up to 3%. Requires these expenses to be included in a separate audit schedule of the authorizer's annual audit.
- 20) Sunsets the moratorium on NCB charter schools as of December 31, 2025.

EXISTING LAW:

- Establishes the Charter Schools Act of 1992 which authorizes a school district governing board or county board of education to approve or deny a petition for a charter school to operate independently from the existing school district structure as a method of accomplishing, among other things, improved pupil learning, increased learning opportunities for all pupils, with special emphasis on expanded learning experiences for pupils who are identified as academically low achieving, holding charter schools accountable for meeting measurable pupil outcomes, and providing the schools with a method to change from rule-based to performance-based accountability systems. (Education Code (EC) 47605)
- 2) Establishes a process for the submission of a petition for the establishment of a charter school. Authorizes a petition, identifying a single charter school to operate within the geographical boundaries of the school district, to be submitted to the school district. Authorizes, if the governing board of a school district denies a petition for the establishment of a charter school, the petitioner to elect to submit the petition to the county board of education. Authorizes, if the county board of education denies the charter, the petitioner to submit the petition to the SBE only if the petitioner demonstrates that the school district governing board of education abused its discretion in denying the charter school. Authorizes a school that serves a countywide purpose to submit the charter petition directly to the county office of education.
- 3) Requires, upon renewal, a charter school to be identified as either low performing, middle performing or high performing based on state dashboard accountability data. Requires that low performing, charter schools be denied, however, the school may be renewed for a two year period if the authorizer is presented with verified data that meet specified criteria and the authorizer finds it compelling. Authorizes middle performing charter schools to be renewed for 5 years. Authorizes high performing charter schools to be renewed for 5-7 years.
- 4) Prohibits the authorization and establishment of new nonclassroom based charter schools between January 1, 2020, and January 1, 2026.
- 5) Prohibits a charter school from receiving any public funds for a pupil if the pupil also attends a private school that charges the pupil's family for tuition. Prohibits a charter from being granted that authorizes the conversion of any private school to a charter school. (EC 47602)
- 6) Prohibits, notwithstanding any other law, a local educational agency (LEA), including, but not limited to, a charter school, from claiming state funding for the independent study of a pupil, whether characterized as home study or otherwise, if the LEA has provided any funds or other thing of value to the pupil or his or her parent or guardian that the LEA does not provide to pupils who attend regular classes or to their parents or guardians. (EC 51747.3)
- 7) Authorizes a charter school to receive funding for nonclassroom based instruction only if a determination for funding is made by the SBE. Requires the determination for funding to be subject to any conditions or limitations the SBE may prescribe. Requires the SBE to adopt regulations that define and establish general rules governing nonclassroom based instruction that apply to all charter schools and to the process for determining funding of nonclassroom based instruction. Defines nonclassroom-based instruction to include, but not be limited to, independent study, home study, work study, and distance and computer-based education. (EC 47612.5)

- 8) Requires the SBE to adopt regulations setting forth criteria for the determination of funding for nonclassroom based instruction, at a minimum the regulation to specify that the nonclassroom based instruction is conducted for the instructional benefit of the pupil and is substantially dedicated to that function. Requires the SBE to consider, among other factors it deems appropriate, the amount of the charter school's total budget expended on certificated employee salaries and benefits, on schoolsites, and the teacher-to-pupil ratio in the school. Requires, for the 2003–04 fiscal year and each fiscal year thereafter, the amount of funding determined by the SBE to not be more than 70% of the unadjusted amount to which a charter school would otherwise be entitled, unless the SBE determines that a greater or lesser amount is appropriate. (EC 47634.2)
- 9) Requires a charter school to transmit a copy of its annual, independent financial audit report for the preceding fiscal year to its chartering entity, the SCO, the county superintendent of schools of the county in which the charter school is sited, (unless the county board of education of the county in which the charter school is sited is the chartering entity) and the CDE, by December 15 of each year. (EC 47605)
- 10) Requires financial and compliance audits to be performed in accordance with General Accounting Office standards for financial and compliance audits. Requires that the audit guide prepared by the SCO be used in the performance of these audits until an audit guide is adopted by the Education Audits Appeal Panel. When an audit guide is adopted by that panel, the adopted audit guide be used in the performance of these audits, and that every audit report specifically and separately address each of the state program compliance requirements included in the audit guide, stating whether or not the district is in compliance with those requirements. (EC 14503)
- 11) Authorizes the independent study (IS) program for school districts, COEs and charter schools. Requires LEAs that offer IS to adopt written policies that include the length of time that may elapse between the time an independent study assignment is made and the date the pupil must complete the assigned work, missed work assignments, and there be a written agreement between the pupil and the IS program. Requires that the written agreement include processes for submitting pupil work, objectives and methods of study for the pupil's work, resource that will be made available to the pupil, duration of the agreement, and number of credits to be earned upon completion. A pupil with an Individualized Education Program (IEP) is not authorized to participate in an IS program unless their IEP specifically provides for that participation. Requires that the IS of each pupil be coordinated, and evaluated under the general supervision of an employee of the LEA who possesses a valid certification document or an emergency credential. Establishes certificated employee-to-pupil ratios, as specified. (EC 51745–51749.3)
- 12) Authorizes the Course Based Independent Study (CBIS) program for school districts, COEs, and charter schools for pupils enrolled in kindergarten and grades 1-12, inclusive, under the following conditions: completion of a signed learning agreement between the pupil and school, courses are taught under the general supervision of certificated employees who old the appropriate subject matter credential, and are employed by the LEA, courses are annually certified by the LEA governing board or body to be of the same rigor and educational quality as equivalent classroom-based courses and aligned to all relevant local and state content standards, requires certificated employees and pupils to communicate in person, by telephone, or by any other live visual or audio connection no less than twice per calendar

month to assess whether the pupil is making satisfactory educational progress, requires an evaluation if the pupil is not making satisfactory educational progress. Requires a written agreement between the CBIS program and the pupil. Specifies that if more than 10% of the total ADA of a school district, charter school, or COE is claimed, then the amount of ADA for all pupils enrolled by that LEA that is in excess of 10% of the total ADA for the LEA is to be reduced, as specified. (EC 51749.5–51749.6)

- 13) Requires each chartering authority to do all of the following with respect to each charter school under its authority:
 - a) Identify at least one staff member as a contact person for the charter school;
 - b) Visit each charter school at least annually;
 - c) Ensure that each charter school under its authority complies with all reports required of charter schools by law, including the local control and accountability plan (LCAP) and annual update to the LCAP required pursuant to Section 47606.5;
 - d) Monitor the fiscal condition of each charter school under its authority; and
 - e) Provide timely notification to the CDE if any of the following circumstances occur or will occur with regard to a charter school for which it is the chartering authority:
 - i. A renewal of the charter is granted or denied;
 - ii. The charter is revoked; or
 - iii. The charter school will cease operation for any reason. (EC 47604.32)
- 14) Authorizes a chartering authority to charge for the actual costs of supervisorial oversight of a charter school, not to exceed 1% of the revenue of the charter school. Authorizes a chartering authority to charge for the actual costs of supervisorial oversight of a charter school not to exceed 3% of the revenue of the charter school if the charter school is able to obtain substantially rent free facilities from the chartering authority. Authorizes a LEA that is given the responsibility for supervisorial oversight of a charter school by the SBE to charge for the actual costs of supervisorial oversight and administrative costs necessary to secure charter school funding. (EC 47613)

FISCAL EFFECT: Unknown

COMMENTS:

Need for the bill. According to the author, "Upon the discovery of large-scale fraud perpetrated by a number of nonclassroom based charter schools, the Legislature imposed a moratorium on the establishment of new NCB charter schools, with a commitment to reform NCB charter schools.

One example of such fraud includes *People v. McManus*, where the San Diego County District Attorney's Office indicted 11 defendants in a fraud scheme involving nineteen A3 Charter Schools. A3 Charter Schools created a partnership with a Little League summer sports program and enrolled Little League players in their charter school during the summer months to generate

state attendance funding, despite A3 Charter Schools having never provided instruction to these little league players. A3 Charter Schools also transferred pupils between charter schools in their network to collect more than one school year of funding per pupil. The A3 Charter Schools case revealed many weaknesses in the State's education system in the areas of pupil data tracking, auditing, and school finance.

Loopholes in state law have allowed these unscrupulous practices at NCB charter schools to continue unchecked, wasting State taxpayer dollars. The state must enact comprehensive reforms, consistent with the 2024 Legislative Analyst's Office (LAO)/FCMAT report to the Legislature and the Controller's Taskforce report, to combat fraud before the moratorium on NCB charter schools expires in January 2026. AB 84 does that by improving transparency and accountability among charter school authorizers and charter schools."

Background on charter schools. According to the CDE, as of the 2024-25 school year, there are 1,280 active charter schools in California, with an enrollment of over 709,000 pupils. Some charter schools are new, while others are conversions from existing public schools. Charter schools are part of the state's public education system and are funded by public dollars. A charter school is usually created or organized by a group of teachers, parents, community leaders, a community-based organization, or an education management organization. Charter schools are authorized by school district boards and county boards of education. A charter school is generally exempt from most laws governing school districts, except where specifically noted in the law. Specific goals and operating procedures for the charter school are detailed in an agreement (or "charter") between the authorizing board and charter organizers.

What is nonclassroom based instruction? Nonclassroom based instruction includes computerbased instruction using software modules, teacher-directed independent study, and traditional homeschool parents who enroll their children in independent study charter school programs.

A nonclassroom based charter school is defined as a school with less than 80% of its total ADA that is classroom based, in which instruction takes place in a classroom setting. As of April 2021, there were 304 charter schools considered to be NCB. Of that number, 105 charter schools self-identified as providing exclusively virtual or primarily virtual instruction.

Existing law defines charter school nonclassroom based instruction as instruction that does **not** meet the requirements of classroom-based instruction. Those requirements are:

- Charter school pupils are engaged in required educational activities and are under the immediate supervision and control of a certificated teacher;
- At least 80% of the instructional time offered by the charter school is at the schoolsite (defined as a facility that is used primarily for classroom instruction); and
- Pupil attendance at the schoolsite is required for at least 80% of the minimum instructional time.

What does research say about pupil academic achievement at NCB charter and virtual

schools? Research indicates that students at NCB charters and virtual schools achieve lower rates of academic achievement compared to students at classroom-based schools. One review notes, "By any measure, online charter schools perform significantly worse than traditional public schools, and this negative impact carries across every demographic of pupils. So while

online schools are indeed needed for pupils whose requirements cannot be met by brick-andmortar schools, it's clear that the quality of education offered by online charter schools is significantly below the state average. As public policy, legislators should be looking to limit the number of students in online charter schools and should resist calls to expand this sector." (Lafer, 2021)

A 2015 national analysis of NCB charter schools found, "The differences were much larger between classroom-based and non-classroom-based charter schools with the nonclassroom-based charter schools having lower achievement. This result is consistent with a study of Ohio charter schools that found virtual schools performing poorly relative to traditional public schools (TPSs) and other charter schools (Zimmer, et al., 2009). It is consistent as well with findings for Pennsylvania, which has among the highest proportion of online charter pupils. The Center for Research on Education Outcomes (CREDO) (2011) report on Pennsylvania charter schools found that all eight cyber schools then operating performed significantly and substantially worse on both mathematics and reading than TPSs." (Epple, et al., 2015)

The following chart shows the California statewide average student achievement at traditional brick and mortar schools, versus the average pupil performance at online charter schools. This data excludes all schools that mainly serve pupils who are credit deficient (known as DASS alternative schools), however, when DASS schools are included, the difference in pupil performance between classroom based schools and online charter schools is even more significant.

	California statewide average (excluding DASS alternative schools)	Online charter schools (excluding DASS alternative schools)
Distance from Standard, English Language Arts/Literacy	-2	-17.3
ELA Percentile Rank		43.5%
Distance from Standard, Math	-30.4	-78.4
Math Percentile Rank		20.9%
Career & College Readiness	45.5	18.2
Career/College Percentile Rank		37.7%
Graduation Rate	88.5	73.1
Graduation Rate Percentile Rank		23.2%

Academic Performance, Online Charter Schools, and Statewide Average, Except Alternative Schools

(Source: In the Public Interest (Lafer, 2021))

Numerous studies indicate that online instruction is not as effective as regular classroom instruction:

• A 2019 study by the CREDO at Stanford University of charter schools in South Carolina concluded that students attending online charter schools have weaker growth in both reading and math compared to the average traditional public school. The gap translates to

35 and 118 fewer days of learning for online charter students in reading and math, respectively. In contrast, students in brick-and-mortar charters post academic progress in reading and math similar to that of the average traditional public school students.

- A CREDO study in 2019 of students in New Mexico attending online charter schools found those students to have substantially weaker growth in both reading and math than the average traditional public school students. The gaps translate to 130 fewer days of learning in reading and 118 fewer days of learning in math for online charter students. In contrast, students in brick-and-mortar charters exhibit stronger growth in reading (equivalent to 24 extra days of learning) and obtain similar learning gains in math as compared with the average traditional public school students.
- A CREDO study in 2019 of students in Ohio attending online charter schools found students to have substantially weaker growth in both reading and math than the average traditional public school students. The gaps translate to 47 fewer days of learning in reading and 136 fewer days of learning in math for online charter students. In contrast, students in brick-and-mortar charters exhibit stronger growth in reading (equivalent to 24 days of extra learning) and obtain similar learning gains in math as compared with the average traditional public school students.
- A CREDO study in 2019 of students in Pennsylvania attending online charter schools found students to have weaker growth in both reading and math compared to the average traditional public school. These gaps translate to 106 fewer days of learning in reading and 118 fewer days of learning in math. Students attending brick-and-mortar charter schools however exhibit positive growth in reading compared to the average traditional public school students, gaining about 24 days of learning. In math, brick-and-mortar charter school students perform similarly to the average traditional public school students.
- A CREDO study in 2019 of students in Idaho attending online charter schools found students to have similar growth in reading and weaker growth in math compared to the average traditional public school student. The gap translates to 59 fewer days of learning in math for online charter students. The study found no learning loss in reading associated with online charter schools in Idaho. Students in brick-and mortar charters exhibit stronger growth in reading and math, equivalent to 30 and 35 extra days of learning, respectively, compared with the average traditional public school students.
- A CREDO study in 2015 concluded that the learning deficit of virtual schools is equivalent to receiving 180 fewer days of math instruction and 72 fewer days of reading instruction. The study's author said that the learning in math was so small that it was "literally as though the student did not go to school for the entire year."
- A CREDO study in 2011 of charter school performance in Pennsylvania found that each of that state's 8 online charter schools ("cyber schools") significantly underperformed brick-and-mortar schools and regular (non-virtual) charter schools in reading and math.
- A year review of virtual schools in Wisconsin by the Gannett Wisconsin Media Investigative Team found that pupils receiving online instruction "often struggle to

complete their degrees and repeat grades four times as often as their brick-and-mortar counterparts," and that they "trail traditional students in every subject but reading."

- A 2011 report from the Office of the Legislative Auditor in Minnesota reported that fulltime online pupils were more likely to completely drop out of school and made less progress on state standardized math tests than pupils in traditional schools.
- A 2011 report from the Ohio Department of Education rated only three of Ohio's 27 virtual schools as "effective" or "excellent."
- A 2006 performance audit by the Colorado Department of Education of that state's virtual schools found that, "in the aggregate, online students performed poorly on the CSAP (Colorado State Assessment Program) exams and had higher repeater, attrition, and dropout rates."

A report by In the Public Interest (*Virtual Public Education in California*, 2015) focused specifically on California Virtual Academy (CAVA) schools, and concluded that "students at CAVA are at risk of low quality educational outcomes, and some are falling through the cracks entirely, in a poorly resourced and troubled educational environment." Among the concerns identified by the report are the following:

- In every year since it began graduating pupils, except 2013, CAVA has had more dropouts than graduates.
- Pupils are eligible to be counted as having attended with as little as one minute of login time each day.
- K12 California (the California subsidiary of K-12, Inc.) pays itself for services out of CAVA school bank accounts that it (K12 California) manages.
- Competitive bidding is prohibited: K12 California contractually prohibits CAVA schools from seeking another vendor for services that K12 California is willing and able to perform.
- CAVA teachers report that the "vast majority" of the work they do is clerical, preventing them from spending sufficient time teaching.
- Limited local control: individual CAVA location governing boards operate under contract with K12 California and do not "have much leeway in terms of budget, program and contracting decisions independent from K12 California."
- K12, Inc. charges CAVA schools more than they can reasonably pay for administrative and technology services. The shortfall is covered by "budget credits" that are extended by K12, Inc., which results in a "perpetual debt" relationship between CAVA schools and K12, Inc.
- CAVA pupils have lower academic achievement, higher dropout rates, and higher turnover than pupils enrolled in brick-and-mortar schools.

Virtual schools have consistently been shown to underperform brick-and-mortar schools by wide margins. At the same time, California has invested heavily in policies to improve pupil outcomes, including the adoption of rigorous academic content standards, assessments aligned to those standards, and the use of evaluation rubrics (the "California School Dashboard") to monitor school and district performance and identify districts for targeted assistance.

Recent A3 Charter Schools fraud case reveals significant weaknesses in nonclassroom based charter school law. Numerous charter school fraud cases have been documented in recent years including, but not limited to: A3 Charter Schools, Magnolia Charter School, Tri-Valley Learning Corporation, among others.

In *People v. McManus* the San Diego County District Attorney's Office indicted 11 defendants in a fraud scheme involving nineteen charter schools (A3 Charter Schools). The case revealed many weaknesses in state public charter school law in the areas of pupil data tracking, auditing, school finance, and oversight, which resulted in A3 schools surrendering more than \$210 million, 13 houses, and numerous shares in third-party companies.

- *Lack of pupil data tracking.* Currently, charter schools submit aggregate attendance data for each school without any information about individual pupils. Oversight agencies do not maintain individual pupil data about enrollments in charter schools they oversee for state funding purposes. One A3 charter school was found to be paying a private company to recruit and collect personal information from pupil athletes. The school then enrolled the athletes in the charter school without their knowledge—thereby fraudulently generating ADA—and paid the recruiting company a portion of the public funds generated as a finder's fee.
- *Multi-track calendar abuses.* The A3 schools were found to have deceived the state into paying them significantly more funds by manipulating the "multi-track year round calendar," which charter schools are currently authorized to use. The A3 schools would (1) run a fake summer school to collect funding for pupils that never knowingly enrolled, (2) inflate their fraudulent summer school attendance numbers—to the tune of about 60%—by offering fewer days of fake summer school instruction, and (3) transfer pupils between different A3 schools, increasing attendance fraudulently by another roughly 40%.
- Lack of meaningful audit requirements. The annual audits required by law found little to no malpractice by A3 schools, for several reasons. First, auditors are not required to complete any specialized up-front or ongoing training in school finance or law to audit a charter school. Second, charter schools can choose their auditors—A3 schools were shown to have fired their auditing firms and hired less experienced firms in the rare event that audit findings were made. Third, NCB charter schools are allowed to pick their own samples of pupil documentation showing compliance with independent study laws—enabling A3 to hide the fraudulent aspects of their operation from auditors. Fourth, auditors are not required to audit the education program received by pupils, only compliance with documentation. In the A3 schools, many children were enrolled from sports teams, believing they were participating in a fundraiser and had no knowledge they were enrolled in a charter school at all.

- *Flawed funding determination process.* While existing law requires that NCB charter schools only receive full funding in exceptional circumstances—when at least 80% of funding is spent directly serving pupils—the current funding determination process essentially funds all schools at 100%. This is because existing regulations define "instructional and related services" very broadly, and charter schools can meet these spending benchmarks without necessarily spending money on pupils. Further, NCB charter schools are only required to request a funding determination and provide compliance documentation to the SBE every five years.
- *Perverse financial incentives for charter school authorizers.* Existing law allows charter authorizers to collect oversight fees from charter schools under their authority but does not require authorizers to demonstrate that the fees are spent on meaningful school oversight. Small school districts that approve NCB charter schools serving pupils not located in the district can earn significant oversight fees—creating a built-in incentive to overlook poor charter school practices. For example, Dehesa Elementary School District approved over ten charter schools all providing NCB programs. The district's oversight fees for the 2017-2018 school year were more than its entire expenditures for all employees hired by the district. When the district learned of improprieties from their charter schools it took no meaningful action. Ultimately, the district collected the oversight fees and only acted to revoke the A3 Charter Schools under its authority once law enforcement was involved.

The chart below illustrates a sampling of current small school districts that have authorized large numbers of nonclassroom based charter schools.

School District Name	School District ADA	Authorized Charter School ADA
New Jerusalem	22	4,500
Elementary		
Oro Grande	109	3,738
Dehesa Elementary	145	8,532
Maricopa Unified	300	6,067
Julian Union Elementary	311	3,502
Campbell Union	876	6,417
Acton-Agua Dulce	1,080	13,775
Unified		

(Source: California School Boards Association)

Small district authorizers. Most NCB charter schools are authorized by small rural school districts. Many of these small districts are stretched thin with regard to staff, and in some cases the Superintendent holds many roles like math teacher and school bus driver. These small districts do not have the capacity to provide meaningful charter school oversight. In some cases, these small school districts authorize NCB charter schools as a means to balance their district budgets, through the collection of oversight fees. There are very small school districts authorizing large NCB charter schools. This bill matches the capacity of small school districts to provide meaningful charter schools to be authorized as follows:

- School districts < 2,500 in ADA may authorize NCB charters up to 100% of district ADA;
- School Districts of 2,500-5,000 ADA may authorize NCB charters up to 2,500 ADA; and
- School Districts of 5,000-10,000 ADA may authorize NCB charters up to 50% of district ADA.

These requirements will significantly limit, and in some cases stop, the authorization of NCB charters by districts less than 2,500 ADA, and will slow the growth of authorization of NCB charters at districts between 2,500-10,000 ADA.

Some charter schools give education dollars to parents. Some NCB charter schools cater to families that want to have the parent serve as the primary person delivering instruction and these schools allow parents to direct how their children's education dollars are spent.

As of April 2025, the South Sutter Charter School's website states, "For the 2024/25 school year, family accounts are funded up to the following amounts:

- \$4,150 High School
- $$3,650 1^{st}-8^{th}$ Grade
- \$2,650 TK-K Grade"

As of April 2025, the Arete Charter Academy's website states, "for the 2025-2026 school year, TK-12th grade students receive \$4500 of instructional funding per school year. Arete will use \$700 to purchase student curriculum or academic instruction. The remaining \$2,550 (\$1275 per semester) is used for the parent's choice of field trips, supplemental materials, technology, tutoring and/or extra enrichment courses whether provided at the Arete Resource Center or off-site at a community vendor. \$750 is used for targeted academic support in the form of one on one or small group (five or less students) tutoring/intervention. If the student is meeting grade level standards those funds become unrestricted enrichment funds. \$500 is used for expanded learning opportunities."

Arete Charter Academy's list of vendors includes, but is not limited to:

- Horsemanship
- Swim Lessons
- CrossFit training
- Golf Pro Lessons at a Golf course
- Music Lessons
- Tutoring Services
- Dance Lessons
- Cooking Lessons

Investigative journalism found examples of inappropriate use of public school funds through vendor contracts. Investigations into the operations of a few NCB charter schools regarding possible inappropriate use of public school funds are ongoing. A 2019 investigation by the San Diego Union-Tribune found:

- *Trips to Disneyland and SeaWorld*. "In California, there's a way parents can use money from the government to buy multi-day Disneyland Park Hopper passes, San Diego Zoo family memberships, tickets to Medieval Times and dolphin encounters at SeaWorld. There are a handful of charter schools that give pupils' families as much as \$2,800 to \$3,200 tax dollars sent to the charter schools every year to spend on anything they want from a list of thousands of home-school vendors approved by the charters, according to the schools' websites. If you live in California and you're not taking advantage of this, I don't know what to say,' said Karen Akpan, a home-school charter parent of four who lives in Beaumont. She wrote a recent blog article describing how she used the educational funds to pay for a family trip to Disneyland, Chicago CityPASSes, and Legoland tickets, as well as computer coding kits, educational toys, books, and subscription cooking kits for her kids."
- *California is the only state paying for these types of services*. "I don't know of any states where they're paying for the kinds of things they're paying for in California,' said Mike Smith, president of the Home School Legal Defense Assn, a national group that advocates for homeschooling families. 'Those schools don't have as many fixed costs as a school that would have a large campus, paying for heat and custodians and all of that. But yet, they get the same amount of money per student from the state,' said Stephanie Hood, a charter school adviser with the Homeschool Assn. of California. It is relatively easy for home-school charters to recruit pupils, because enrollment happens online and families in 34 counties on its website, even though its schools were authorized to operate in only three counties. 'As you know, that's why some of the problems have occurred, because there's so much money in it,' Smith said. 'It's very easy to do. ... It's just ripe for the kind of things that are going on.'"
- **Public education dollars spent at private schools**. Some charter school vendors are businesses or nonprofits that cater to homeschoolers and operate like private schools in that they charge tuition and employ their own teachers, who often are not credentialed by the state. Some vendors provide a wide variety of classes, ranging from electives such as sewing and cooking, to core classes such as traditional English, math and science. Many of these vendors do not call themselves schools, but rather enrichment centers, learning centers, home school co-ops or tutoring academies. Some larger vendors, such as Homeschool Campus and Discovery of Learning, have several campuses, often at churches. Enrolling in a home school charter can allow the pupil to use the charter school's funds to pay the tuition for these schools, if their assigned charter school teacher approves it.
- **Public education dollars spent at religious schools**. There also are religiously affiliated vendors, like the Christian-owned Eden Learning Academy, which until recently said on its website that it is based on a 'Christian Worldview,' or the Christian Youth Theater, which says on its website that part of its objective is to 'share the love of Christ in word and deed.'" Inspire Charter School lists Eden Learning Academy and the Christian Youth Theater as vendors on their website.

Funding determination. As noted earlier in this analysis, NCB charter schools are required to obtain a funding determination that is approved by the SBE. This funding determination establishes the percentage of funding the NCB charter school will receive compared to all other

traditional classroom based schools. Most charter schools apply for a 100% NCB funding determination. To do so, they must meet the following criteria:

- Spend at least 40% of total public revenue on instructional certificated salary and benefits;
- Spend at least 80% of total public revenue on instruction related services; and,
- Not exceed a 25:1 pupil to teacher ratio.

A 2021 report by In the Public Interest illustrates the possible profiteering permitted by the flawed funding determination system at California's NCB charter schools. The report states:

Overpayment for online charter schools is dramatically illustrated in the case of Connections Academy and its parent corporation Pearson. Alongside the Connections Academy schools, Pearson also operates an online private school, the Pearson Online Academy, for Americans stationed abroad who want their children to get an American education or for those in states that do not allow charter schools. The curriculum for Pearson Online Academy and California Connections Academy schools are the same – both the list of courses and the description of each course's content are virtually identical in both schools. Indeed, when asked if the two schools' classes are sufficiently similar so that a student could seamlessly transfer between one and the other in the middle of a school year, a Pearson company representative stated that the courses line up "apples to apples – so close it's ridiculous." Another Pearson representative explained that "the private side [Pearson Online Academy] writes the curriculum for the Connections side," and as a result "transferring credits is no problem."

But while the product may be the same, the costs for these courses are dramatically different. California taxpayers pay approximately \$10,300 for every student who attends a Connections Academy school. By contrast, the tuition for enrolling in the Pearson Online Academy is just \$4,800 for an elementary school student, \$5,880 for middle school, and \$6,880 for high school. It seems then that California taxpayers are paying a markup of at least 35 percent (approximately \$3,500 per student) above all costs, including reasonable profit. So across all the schools in this chain, California taxpayers are wasting over \$22 million per year.

In other words, if the state of California simply paid all Connections Academy students to attend Pearson's private online school, taxpayers would save over \$22 million per year.

LAO/FCMAT Review of NCB Charter Funding Determination Process. In their 2024 report to the Legislature, the LAO and FCMAT made the following recommendations:

Recommend Several Changes to Improve Funding Determination Process. We provide several specific recommendations the Legislature could enact to improve the funding determination process. Our recommendations are intended to narrow the process to a smaller subset of schools, improve the comprehensiveness and quality of data submitted to CDE, and streamline some aspects of the process. Most significantly, we recommend the Legislature:

- *Narrow the Definition of a Nonclassroom-Based Charter School.* We recommend narrowing the definition of a nonclassroom-based charter school so that the designation excludes those schools that provide the majority of their instruction in person. This would exclude charter schools whose programs have cost structures that are similar to traditional classroom-based programs.
- *Improve Quality of Data Submitted to CDE*. To assist CDE in efficiently reviewing and processing funding determination forms, we recommend requiring data submitted by charter schools be consistent with their annual audits. We also recommend several changes that would require information submitted to CDE be subject to annual audits.
- Use Multiple Years of Data for Funding Determinations. We recommend the funding determinations take into consideration a school's aggregate spending for all years since the previous funding determination. This would ensure school expenditures are aligned with the funding determination thresholds consistently over time.

Consider Changes to Charter School Oversight. We also provide several recommendations for the Legislature to consider regarding broader oversight of charter schools. These issues generally apply to all charter schools, though in a few cases we highlight specific issues related to nonclassroom-based charter schools and virtual charter schools. Most significantly, we recommend the Legislature consider the following:

- *Improvements to Oversight by Charter School Authorizers*. We recommend the Legislature consider several changes to improve the quality of authorizer oversight. Specifically, we recommend the Legislature set limits on district authorizers by district size and grade, increase minimum requirements for authorizers, and consider an alternative authorizing structure for virtual schools.
- *Enhancements to Charter School Audits.* Current audit requirements often do not address the complexities and unique flexibilities of charter school finances. We recommend the Legislature align the audit process for charter schools to that of school districts and add audit requirements that would address issues specific to charter schools."

Audit standards identified as flawed as a result of the A3 Charter School Case. The A3 Charter case illustrated many faults in the way that charter schools are audited compared to school districts.

• Current law allows charter schools to be audited as nonprofit corporations rather than as governmental entities. Nonprofit corporation audits are not nearly as detailed as governmental entity audits. This bill creates parity between charter schools and school districts with regard to audit procedures and schedules so that charter school audits will be as detailed as school districts, and use the Standardized Account Code Structure required of school districts.

- Current law does not require school district and charter school auditors to receive any special training on auditing schools. This bill requires training for school district and charter auditors and updates the audit peer review process to include school audits.
- The law does not provide the CDE the authority to investigate wrongdoing among school districts and charter schools. The federal government has established an Office of the Inspector General at each federal department, including the Department of Education. This bill emulates the federal process and creates the Office of Inspector General at the CDE.
- Current law does not direct auditors to review many aspects of independent study programs at charter schools. This bill updates the audit guide to include sampling guidance, pupil to teacher ratios, the 25 largest monetary transfers, and pupil attendance.

State Controller's Charter School Audits Task Force. In response to the A3 Charter School fraud case, a San Diego Superior Court Judge signed a court order to approve the formation of a multi-agency task force, known as the Multi-Agency Charter School Audits Task Force lead by the SCO to combat charter school fraud. The 2024 Task Force report made the following recommendations:

The Task Force extensively discussed the current state of California charter schools and developed recommendations based on the combined expertise, experience, and knowledge of multi-disciplinary Task Force members. These recommendations are intended to foster a culture of transparency and accountability by further strengthening charter school audit function components. The recommendations are organized into the following sections of this report:

• Certified Public Accountant Firm Authorization, Qualifications, Training, Evaluation, and Compliance with K-12 Audit Guide;

• Certified Public Accountant Firm Selection, Rotation, and Late Audit Report Notifications:

- K-12 Audit Guide Procedures; and
- Financial Statement Audit Report Disclosures.

The Task Force determined that most of the recommendations should be applied to all local education agencies including school districts, county offices of education, and charter schools, providing opportunities to strengthen the audit functions across the entire local education agency system. To combat fraud in charter schools, it is important that oversight agencies, in addition to those performing charter school audit functions, implement strong internal and monitoring controls to timely identify and mitigate potential fraud. The control and monitoring functions include the charter school petition and approval process, the charter school accountability systems, the authorizer monitoring of charter schools, and the

respective oversight functions of the charter school governing board, county offices of education, the California Department of Education, and the State Controller's Office.

Teacher assignments, school calendars, and pupil attendance. Current law requires IS programs to operate with specified pupil-to-teacher ratios. Some charter school networks, however, have exceeded these ratios by assigning teachers different groups of pupils at multiple schools. While on paper, it appears that a teacher has a 25-to-one pupil-to-teacher ratio at a single school, in reality, the teacher has a much higher pupil-to-teacher ratio across their entire teaching assignment at multiple schools. This bill requires parity in pupil-to-teacher ratios in independent study programs across a teacher's assignment.

The A3 Charter School case demonstrated the ability of schools to manipulate their calendars to collect far more than one year of attendance funding per pupil from the State. The A3 Charter School used the multitrack year-round calendar to run a summer program and erroneously enrolled Little League players over the summer months, enrolled them without their parent's knowledge, and collected attendance funding without providing any instruction to these children. Further, A3 Charter Schools transferred students between multiple schools in their network over the summer months, using the multitrack year-round schedule, and altered their calendar, to collect much more than one year of attendance funding per student. This bill prohibits multi-year-round track calendars for school districts and charter schools to protect the State from paying more than one year of attendance per pupil. The bill further provides a SBE waiver in the case of severe facility shortages, for example, those facility shortages seen in Elk Grove Unified School District.

AB 1507 (Smith, McCarty, O'Donnell) in the 2019-20 Session prohibits NCB charters from establishing satellite facilities outside the boundaries of the district in which they are authorized. Due to the fact that these schools cannot establish facilities in adjacent counties, this bill proposes to permit NCB charter attendance only within the county in which the school is authorized to facilitate increased in-person instructional opportunities. With the attendance boundary more closely matching the area in which the school is authorized to have facilities, more children will be afforded the opportunity to have in-classroom learning opportunities.

CALPADS and ADA data systems. The State's attendance accounting system is not connected to the CALPADS. In other words, when a charter school or school district submits its ADA information to the State, that ADA is not reported along with pupil identification. The State, therefore, does not know which pupils ADA is being claimed when it processes attendance apportionments. Current law prohibits a school from claiming more than one year of attendance per pupil, however, more than one year of attendance can be paid per pupil if the pupil attends more than one school. This bill requires, by January 2030, the CDE to study the feasibility of connecting CALPADS and the attendance accounting system to allow the State to determine when a pupil generates more than one year of attendance within one calendar year. This is the only way for the State to know precisely when one year of attendance has been generated for a particular pupil, and when the State is paying more than one year of attendance per pupil, per year.

Authorizer oversight and oversight fees. Charter school authorizers play a vital role in providing oversight over both the academic and fiscal aspects of the charter schools they authorize. In order to provide better oversight, this bill requires increased targeted oversight by authorizers in the following areas:

- Attendance accounting;
- Pupil-to-teacher ratios;
- Percentage of pupils engaged in classroom-based instruction; and
- Audit compliance monitoring.

In order to compensate authorizers for these increased oversight responsibilities this bill proposes to increase oversight fees from 1% of the charter school's revenue (current law) to 3% of the charter school's revenue by July 1, 2028. Further, these oversight fees will be included in a separate audit schedule in the school district annual audit.

Charter school authorizers have very few resources for technical assistance and support of their charter authorizing and oversight work. A few charter authorizers have an office of staff focused on charter school authorizing and oversight, however most authorizers are so small that they do not have any dedicated charter school staff. In the past, these LEAs have relied on the assistance of the Charter Authorizer Regional Support Network (CARSNet), while the program was funded with a federal grant. Through CARSNet, authorizers received training and attended conferences to polish their expertise in authorizing and oversight. During its tenure, CARSNet held 67 regional trainings and conferences with nearly 1,300 participants from across California. The federal grant funding expired, and the program lapsed over the last few years.

This bill proposes to re-establish the program as the Charter Authorizing Support Team, managed by the FCMAT. This program will provide the necessary training and technical assistance that charter authorizers need as they consider charter school petitions and provide meaningful oversight of the charter schools they authorize.

Arguments in support. The California School Employees Association states, "The California School Employees Association (CSEA), AFL-CIO, supports Assembly Bill (AB) 84 (Muratsuchi), our sponsored legislation to implement comprehensive reforms to nonclassroombased charter (NCB) law aligned with the recommendations issued by the Legislative Analyst's Office (LAO), the Fiscal Crisis and Management Assistance Team (FCMAT), the Multi-Agency Charter School Audits Task Force, and the California Charter Authorizing Professionals. In 2019, the San Diego County District Attorney charged eleven people in a \$400 million fraud scheme involving the nonprofit NCB charter operator A3 Education. A3's leadership—Sean McManus and Jason Schrock—pulled off what has become known as one of the biggest charter school scandals in U.S. history by exploiting gaps in the law and deficiencies in charter authorizer oversight.

A3 fraudulently enrolled students who never actually took any classes in their schools by hiring enrollment workers to contact youth athletic organizations. A3 pledged to donate money to the athletic programs in exchange for each student who signed up and pocketed the difference—totaling as much as \$1,550 per child. The charter management organization (CMO) avoided scrutiny for their practices by seeking small school districts without adequate oversight staff to be their authorizers. McManus and Schrock exerted total control over their network of schools by acting as both the administrators of the online schools as well as a vendor providing back-end business services.

The A3 case clearly exemplifies how California's existing system of oversight for NCB charters—carried out by public authorizers, annual financial audits, and the State Board of Education through its NCB funding determination process—is woefully inadequate. That is why the Legislature in 2019 issued a moratorium on the establishment of any new NCB charters in California. This moratorium gave time for experts from the LAO and FCMAT to investigate these issues and propose comprehensive solutions. In addition, San Diego Superior Court Judge Robert C. Longstreth ordered the State Controller to chair a multi-agency task force to develop audit criteria and best practices for detecting and curtailing future fraud in charter schools. With the NCB charter moratorium set to expire in January 2026, the Legislature must act this year to strengthen our laws and prevent another case like A3."

Arguments in opposition. Excel Academy states, "State funding policy must prioritize and uphold the truth that all students have equal value and deserve and warranty equal funding regardless of the type of school they choose, whether county office operated, district operated, or public charter school operated, and must be supported through equal opportunity to choose the type of learning model and program that best matches their needs and interests. State funding policy must never discriminate against students who choose alternative education models other than a physical classroom model that are a better match for them, nor should public funding policy pick winners and losers among students.

As currently written, AB 84 will severely limit educational choices and result in significant harm to high quality NCB public charter school students and schools at a time when more choices in the public school system can help meet the needs of underserved students."

Recommended Committee Amendments. Staff recommends the bill be amended to:

- 1) Require the Education Inspector General to report to the SBE instead of the SPI.
- 2) Clarify that the schedule of pupil enrollment shall be by grade and reflect the enrollment recorded on the last day of the school month as defined in existing law.
- 3) Limit the required audit schedule of pupil-to-teacher ratios to independent study programs.
- 4) Clarify that the audit schedule of pupil enrollment also verify pupil residency and verify both by sampling residency documentation provided at the time of enrollment, instead of obtaining written confirmation from a parent or guardian.
- 5) Clarify that the audit sampling of payments include credit card statements, debit card statements and other electronic forms of payment.
- 6) Require new authorizer oversight requirements commence July 1, 2028. Authorize charter authorities to charge the actual cost of oversight up to 2% beginning in the 2028-29 fiscal year and up to 3% beginning July 1, 2029.
- 7) Authorize a NCB charter in operation before December 31, 2025 that exceeds the ADA thresholds for small district authorizers to continue to be authorized by their existing chartering authority if that school district employs four executive level staff members whom

have job responsibilities in the following areas: Superintendent, Chief Business Official, Human Resources, Special Education, and Curriculum.

- 8) Require that dependent charter schools authorized pursuant to Section 47605.5 shall have no adjustment made to their funding determination.
- 9) Clarify that charter schools are subject to Section 45037 and 41372, and specify that NCB charters shall expend 40% of the charter school's current expense of education calculation on salaries of classroom teachers, consistent with the existing funding determination percentage.

Related legislation. SB 719 (Cabaldon) of the 2025-26 Session would make changes to the auditing standards for local educational agencies.

SB 414 (Ashby) of the 2025-26 Session would establish new requirements for nonclassroom based (NCB) charter schools in the areas of auditing and accounting standards, easing restrictions on the funding determination process, adding requirements to school contractors, and adding requirements to the authorizer oversight process with regard to enrollment and attendance data and credit card monitoring, as specified.

SB 1477 (Ashby) of the 2023-24 Session would have required the governing board of a charter school to review, at a public meeting, the annual audit of the charter school for the prior fiscal year; requires auditors of NCB charter schools to perform specified activities; and requires all LEAs to only enter into an agreement for educational enrichment activities with a vendor that is vetted and approved pursuant to specified criteria. This bill was held in the Assembly Education Committee.

AB 1316 (O'Donnell) of the 2021-22 Session would have established new requirements for NCB charter schools in the areas of auditing and accounting standards, the funding determination process, adding requirements to the contracting process, IS program requirements, required teacher to pupil ratios, limiting authorization of NCB charters by small districts, and adding specificity to the authorizer oversight process, as specified. This bill was held on the Assembly Floor.

SB 593 (Glazer) of the 2021-22 Session would have required the FCMAT to offer auditors of NCB charter schools training on the review of charter school financial documents to better identify irregular practices, requires the governing board of a charter school to annually review, at a public meeting as an item on the agenda, the annual audit of the charter school for the prior fiscal year, requires all independent study by pupils to be coordinated, evaluated, and under the general supervision of an employee of the LEA who possesses a valid certificate, permit, or other document required by law, and requires all LEAs to only enter into an agreement for the provision or arrangement of educational enrichment activities with a vendor that is vetted and approved pursuant to prescribed criteria. This bill was held in the Assembly Education Committee.

AB 2990 (C. Garcia) of the 2019-20 Session would have prohibited a charter school from providing financial incentives to a pupil or a parent of a pupil for educational enrichment activities; required a nonclassroom-based charter school to enter into an agreement for the provision of an educational enrichment activity only with a vendor that has been properly vetted

and approved; required the governing body of a nonclassroom-based charter school to establish policies and procedures to ensure educational value, pupil safety and fiscal reasonableness before approving any contract for educational enrichment activities; and prohibited educational enrichment activity funds from being used for tuition at a private school or for activities, materials and programs that are religious in nature. This bill was held on the Assembly Floor.

AB 1505 (O'Donnell), Chapter 486, Statutes of 2019, established a two year moratorium on the establishment of nonclassroom based charter schools until January 1, 2022.

AB 1507 (Smith), Chapter 487, Statutes of 2019, prohibits charter schools from being located outside the boundaries of their authorizer and, authorizes nonclassroom-based charter schools to establish one resource center within the jurisdiction of the school district where the charter school is located.

SB 1362 (Beall) of the 2017-18 Session would have expanded the existing oversight requirements of, and increased the oversight fees that can be charged by, charter school authorizers; changed the charter petition review process for school district and COEs governing boards; added special education and fiscal and business operations content to the information that must be included in a charter petition; expanded the authority of a governing board to deny charter petitions; and, required the Legislative Analyst to submit a report to the Legislature on special education services by charter schools. This bill was held in the Senate Education Committee.

SB 329 (Mendoza) of the 2015-16 Session would have required a school district or COE, as part of its review of a charter petition, to consider 1) a report assessing its capacity to conduct oversight of the charter school and 2) a report of the anticipated financial and educational impact on the other schools for which the school district has oversight obligations. This bill was held in the Senate Appropriations Committee.

AB 8 X5 (Brownley) of the 2009-10 Session proposed comprehensive changes to the Education Code consistent with the federal Race to the Top (RTTT) program. This bill would have addressed the four RTTT policy reform areas of standards and assessments, data systems to support instruction, great teachers and leaders and turning around the lowest-achieving schools. This bill would have deleted the statewide charter school cap; proposed enhanced charter school fiscal and academic accountability standards. This bill was held in the Senate Education Committee.

REGISTERED SUPPORT / OPPOSITION:

Support

California Labor Federation, Afl-cio California School Boards Association California School Employees Association California State Pta Capistrano Unified School District Cft- a Union of Educators & Classified Professionals, Aft, Afl-cio Public Advocates Public School Defenders Hub

Oppostion

Achieve Charter Schools Action Music Lessons Alder Grove Charter School All Tribes American Indian Charter School Allegiance Steam Academy Alliance College-ready Public Schools Alma Fuerte Public School Alpha Public Schools Alta Public Schools America's Finest Charter School American Heritage Charter Schools Annenkov Music School Antioch Charter Academy Antioch Charter Academy Ii Ararat Charter School Arts in Action Community Charter Schools Aspen Public Schools, INC. **Aspire Public Schools** Association of Personalized Learning Schools & Services (APLUS+), the **Aveson Schools Big Picture Educational Academy** Birmingham Community Charter High School Bridges Charter School **Bridges Preparatory Academy** Brookfield Engineering Science Technology (best Academy) California Charter Schools Association California Health Coalition Advocacy California Montessori Project California Online Public School California Pacific Charter Schools California Parents for Public Virtual Education California Republic Leadership Academy California Virtual Academies Camarillo Academy of Progressive Education Camino Nuevo Charter Academy Champs Charter High School of the Arts Charter Schools Development Center Children's Community Charter School Chime Institute **Choices Charter School** Citizens of the World Charter School Clarksville Charter School Coastal Grove Charter School **Community Learning Center Schools** Core Butte Charter School Core Charter School

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Core Collaboration Crossroads Charter Academy Da Vinci Schools **Delta Managed Solutions Desert Trails Preparatory Academy Discovery Charter Schools** Dixon Montessori Charter School Dr. Lewis Dolphin Stallworth Charter School Dual Language Immersion North County Edison Bethune Charter Academy Ednovate Ednovate (UNREG) **Education for Change Public Schools** Eel River Charter School El Sol Science and Arts Academy **Element Education Elevate School Environmental Charter Schools** Epic Charter School Equitas Academy Charter Schools Excel Academy Charter School **Extera Public Schools** Family Partnership Charter School Feaster (mae L.) Charter School Feather River Charter School Fenton Charter Public Schools Five Keys Forest Charter School Forest Ranch Charter Freedom Keepers United, CA Freedom Keepers Fresno Innovative Charter Schools Gabriella Charter Schools Gateway College and Career Academy Gateway Community Charters Girls Athletic Leadership Schools Los Angeles Glacier High School Charter Golden Valley Charter School Gorman Learning Charter Network Granada Hills Charter Great Valley Academy Green DOT Public Schools Griffin Technology Academies **Growth Public Schools Guajome Schools** Hawking Steam Charter School Heartwood Charter School High Tech Los Angeles Hometech Charter School Howard Gardner Community School

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Icef Public Schools Ilead California Charter Schools **Ingenium Schools** Innovations Academy **Innovative Education Management** Inspire School of Arts and Sciences Intellectual Virtues Academy of Long Beach Invictus Leadership Academy Irvine International Academy Ivy Academia Entrepreneurial Charter School Jcs Family of Charter Schools John Muir Charter Schools Journey School **Kairos Public Schools** Kavod Charter School Kepler Neighborhood School Kid Street Learning Center Charter School Kidinnu Academy Kids' Club Spanish School Kipp Public Schools Northern California Language Academy of Sacramento Larchmont Charter School Lashon Academy Learn4life Learning for Life Charter School Leonardo Da Vinci Health Sciences Charter School Literacy First Charter Schools Los Angeles Academy of Arts and Enterprise Magnolia Public Schools Maria Montessori Charter Academy Matrix for Success Academy Mayacamas Countywide Middle School Meadows Arts and Technology Elementary School Method Schools Montague Charter Academy Motivated Youth Academy Mountain Home School Charter Multicultural Learning Center Museum School Natomas Charter School Natomas Homeschool Alliance **Navigator Schools** New Heights Charter School New Jerusalem Elementary School District New West Charter Nord Country School Northern United Charter Schools Northwest Prep Charter School Nova Academy Early College High School

Ocean Charter School Ocean Grove Charter School **Odyssey Charter Schools** Olive Grove Charter School **Opportunity Youth Schools Coalition** Orange County Academy of Sciences and Arts Orange County School of the Arts / California School of the Arts Foundation Pacific Charter Institute Pacific View Charter School Pacoima Charter School Para Los Ninos Pasadena Rosebud Academy Charter School Pathways Academy Charter School Pazlo Education Foundation Peabody Charter School Phoenix Charter Academy College View Plumas Charter School Port of Los Angeles High School Puente Learning Center Redwood Coast Montessori Redwood Collegiate Academy Renaissance Arts Academy Rex and Margaret Fortune School of Education River Oaks Academy Charter School **Rocklin Academy Family of Schools** Sage Oak Charter Schools San Diego Virtual School San Jose Conservation Corps & Charter School Santa Rosa French American Charter School Parent Foundation Scholarship Prep Charter School Sebastopol Independent Charter Sequoia Career Academy Shasta Charter Academy Sherman Thomas Charter School Sherwood Montessori Shields for Families Sky Mountain Charter School Soar Charter Academy South Sutter Charter School Sparrow Academy Springs Charter Schools Stand Up California Stand Up Sacramento County Stellar Charter School Stem Prep Schools Stride, INC. Success One! Charter Summit Public Schools Suncoast Preparatory Academy

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Sycamore Creek Community Charter School Synergy Academies Tara Hughes Writing Instructor **Taylion Academy Teach Public Schools** Tehama Elearning Academy Temecula Valley Charter School The Cottonwood School The Foundation for Hispanic Education The Grove School The Learning Choice Academy The O'farrell Charter Schools The Preuss School Ucsd Thrive Academics Tierra Pacifica Charter Tree of Life Charter School Trillium Charter School Ultra Jiu Jitsu Academy Union Street Charter Urban Charter Schools Collective Valley Charter School Valley International Preparatory High School Valley Life Charter Schools Valley View Charter Prep Ventura Charter School of Arts and Global Education Vibrant Minds Charter School Virtual Learning Academy, Sage Oak Charter Schools Vista Charter Public Schools Voices College Bound Language Academies Vox Collegiate Westbrook Academy Western Sierra Charter Schools Westlake Charter School Wildflower School William Finch Charter School Wushu Central Martial Arts Academy Ypi Charter Schools Yuba County Career Preparatory Charter School

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