

**Initial Petition- District Appeal**  
**Staff Report**  
**Bridges of Promise Academies**  
**October 21, 2025**

Part I. Executive Summary: Staff Report for Bridges of Promise Academies

<b>Bridges of Promise Academies</b>			
<b>Non-Profit Corporation:</b>	Bridges of Promise Academies, Inc.	<b>Grades Levels:</b>	TK-8
<b>District Boundary:</b>	Menifee Union School District	<b>Anticipated Enrollment:</b>	435 (Year 1) – 789 (Year 5)

**I. Proposed Petition: District Appeal**

Bridges of Promise Academies, Inc. (“Petitioner”) proposes to establish a new charter school by the name of Bridges of Promise Academies (“Charter School”), to eventually serve grades TK-8 within the boundaries of Menifee Union School District (“MUSD”). Nonprofit submitted its appeal to the Riverside County Board of Education (“Board”) following charter petition denial by MUSD.

**II. Proposed Options for Board Action**

It is recommended that the Board take action to either grant or deny the proposed Charter Petition. The Board has the following options:

1. Grant the Petition, based on the findings required by Education Code Section 47605, for a 5-year term, commencing July 1, 2026, and concluding June 30, 2031, provided that the Memorandum of Understanding between the Charter School and RCOE be amended and/or the Petition revised to address the findings and any recommendations identified in the Staff Report prior to the date of commencement of the new term.
2. DENY the Petition and adopt, as findings of fact, the Proposed Findings identified in the Staff Report, concluding the Petition did not meet the requirements of Education Code Section 47605.

The Staff’s recommendation is for the Board to deny the Petition and adopt the Findings identified in the Staff Report.

### **III. Procedural Background and Legal Considerations**

The Charter Schools Act (“Act”) governs the creation of California charter schools and provides standards and criteria for reviewing a charter petition. If a governing board of a school district denies a charter petition, the petitioners may appeal the decision to the county board of education within 30 days of the denial. If the petition submitted on appeal contains new or materially different terms, the county board of education shall immediately remand the petition back to the school district governing board for reconsideration.

When reviewing a petition on appeal, the county board of education must conduct a “de novo” review, applying the same evaluation criteria outlined in Education Code Section 47605(b) and (c). Additionally, the county board is required to hold a public hearing within 60 days of receiving the petition to consider the level of community support. A final decision to grant or deny the charter must be made within 90 days of receipt, unless both parties agree to extend the timeline by up to 30 days. A staff report with all findings and recommendations must be published at least 15 days prior to the public hearing at which the decision is scheduled.

The Charter Petition for Bridges of Promise Academies was submitted on appeal to the Board on August 8, 2025, which satisfies the prescribed 30-day period following its denial by MUSD. The petition on appeal contains no new or materially different terms. Moreover, the district did not cite a fiscal impact under Education Code sections 47605(c)(7)-(8) as a reason for denial, and therefore, an additional analysis evaluating the district’s financial position was not required.

In accordance with statutory requirements, the Riverside County Board of Education held a public hearing on October 1, 2025, to consider the level of support for the proposed Charter Petition. The Board is scheduled to take action on the Charter Petition at its November 5, 2025 meeting. This staff report has been published in compliance with the 15-day notice requirement prior to Board action.

If the Board approves the Petition, it will be the chartering authority for the Charter School and RCOE staff will have oversight responsibilities. If the Board denies the Petition, Petitioner may appeal the denial to the State Board of Education (“SBE”). (Ed. Code, § 47605(k).) The SBE may either hear the appeal or summarily deny review based on the documentary record. If it hears the appeal, the SBE may affirm MUSD’s determination, the Board’s determination, or both, or may reverse only upon finding that there was an abuse of discretion by both MUSD and the Board. (Ed. Code, § 47605(k)(2)(E).)

### **IV. Board’s Authority**

The Board is responsible for evaluating and making the final determination to approve or deny a charter school petition. In doing so, the Board has the authority to assess whether the findings

of fact presented in the staff report support approval or denial, in accordance with the criteria established in Education Code Section 47605.

## V. Executive Summary of Findings

The following **Executive Summary of Findings** is provided to assist the Board in its consideration of the petition submitted by *Bridges of Promise Academies, Inc.* It is intended to capture the essential issues relevant to the Board's decision regarding approval or denial.

The **Detailed Analysis in Part II of this report** offers a fuller explanation of these findings, including the reasoning, context, and information that informed the staff's assessment. In instances where additional documentation or supporting materials were deemed necessary, these have been included as attachments to the report.

### 1. Descriptions Not Reasonably Comprehensive

The Board has the authority to deny a charter petition if it determines the charter petition does not contain reasonably comprehensive descriptions for all of the required elements.

#### Findings for Consideration

*(See pages 18-32 in Detailed Analysis)*

##### Element A: Educational Program

1. Charter School Appears Not to Serve a Specific Target Population. The Petition does not comprehensively describe the Charter School's target student population or identify how the Charter School will meet the needs of its target student population.
2. Inadequate Framing of Student Needs. Petition identifies its instructional framework, but fails to describe how the framework will effectively address the needs of the targeted student population.
3. Petitioner's Instructional Approach Does Not Enable Student Mastery of Content Standards. The Petition states Charter School will implement a variety of instructional approaches, but the description reflects a program that is not fully aligned with the instructional framework it claims to adopt.
4. Petition Does Not Adequately Respond to the Needs of Pupils Achieving Below Expected Levels. The Petition does not provide a comprehensive description of how the Charter School will meet the needs of students performing below or substantially below grade level, or show that the Charter School will be able to provide the systematic interventions required to meet the diverse needs of its student population.
5. Petition Does Not Provide a Reasonably Comprehensive Description of How the Charter School Will Meet the Needs of Students Eligible to Receive Special Education

Services. The Petition provides largely boilerplate language and assumes the charter authorizer will provide the special education services without a meaningful discussion of how services will be structured and delivered.

6. Petition Does not Describe a Comprehensive Plan to Achieve Annual Goals within the Eight State Priorities for all Grade Levels. The descriptions aligning Charter School actions to each state priority are largely generic and do not outline concrete strategies, and therefore does not demonstrate a credible plan to achieve the stated goals.

#### Element B: Measurable Pupil Outcomes

1. Measurable Pupil Outcomes Lack Specificity. Many of the measurable student outcomes provided are difficult to assess objectively, and some of the outcomes that can be measured objectively are not accompanied by sufficient descriptions of how the outcomes will be assessed, or the frequency of assessments according to grade level or subject matter.

#### Element C: Method of Measuring Pupil Progress

1. Petition Lacks Detail Explaining How Pupil Progress will be Measured. The Petition fails to include the K-2 reading screener, which is required by state law, and provides an example rubric without describing how it will be implemented. The Petition relies on a mastering grading model (no letter grade) but does not describe how grades will be transferrable to the high school setting.

#### Element D: Governance Structure

1. Governance Structure Does Not Reflect a Seriousness that Charter School Will Become a Viable Enterprise. The provided organizational chart is extremely limited, which suggests the Charter School will heavily rely on external consultants. The board member biographies do not demonstrate the breadth of experience expected for effective charter school governance. There are significant unanswered questions regarding the role and responsibilities of the proposed back office services provider, which is a primary proponent of the Petition and has fronted its own funds to develop the charter petition and related activities. Descriptions regarding controls and processes are insufficient.

#### Element E: Employee Qualifications

1. Desired Employee Qualifications are Likely Unable to Support the Educational Program. The descriptions of key administrative and instructional positions are insufficient. Despite utilizing a project-based learning model, project-based experience is generally not required, even of key administrators. Qualifications for certain teaching positions fail to provide an accurate description of credentialing

requirements and other relevant standards. The roles and reporting structure of certain positions are not clear.

#### Element F: Health and Safety

1. Petition Omits Comprehensive Description of Required Screenings. The Petition omits comprehensive descriptions of mandatory screenings, fails to identify certain mandatory screenings, and portions of the descriptions do not align with law.

#### Element J: Suspension/Expulsion Procedures.

1. Petition Provides Insufficient Descriptions of Suspension/Expulsion Procedures. The Petition does not identify offenses subject to mandatory expulsion, or descriptions of when a student may be subject to involuntary removal and procedures for such removal.

## 2. Unsound Education Program

The Board has the authority to deny a charter petition if it determines the charter school presents an unsound educational program for the pupils to be enrolled in the charter school.

### Findings for Consideration (See pages 33-36 in Detailed Analysis)

#### A. Concerns Regarding English Learner (EL) Program and English Language Development (ELD) Framework.

1. The Petition does not provide a comprehensive description of its English Language program. Its descriptions are vague, internally inconsistent, and in some cases reflect a fundamental misunderstanding of the California ELD framework, standards, and requirements. The Petition's ELD plan lacks sufficient support and is unlikely to provide meaningful educational benefit for one of the most vulnerable student groups. Deficiencies were identified in the areas of:

- Identification and Parent Notification,
- Program Placement and Instructional Model,
- Designated ELD,
- Integrated ELD,
- Alignment to California ELD Standards, Framework, and Roadmap,
- Program Assessment and Evaluation,
- Reclassification and Monitoring of RFEP Students,
- Students with Distinct Needs,
- Services to Transitional Kindergarten Students.

B. Concerns Regarding Serving the Needs of Students with Disabilities.

1. The Petition fails to comprehensively describe implementation of its special education program, as described above in 1., Descriptions Not Reasonably Comprehensive. The proposed special education program may negatively impact students with disabilities if they do not receive the necessary and appropriate services to support learning.

C. Failure to Acknowledge Mandatory Reading Screener.

1. The Petition fails to acknowledge a new legal requirement of the administration of a state-approved reading screener for students in grades K-2. The required screening is supposed to be considered part of the school's "comprehensive instructional strategy." If the screening is not implemented, it has the potential to negatively impact students because those with reading difficulties will not be identified at the earliest stage of their education.

### 3. Demonstrably Unlikely to Successfully Implement Program

The Board has the authority to deny a charter petition if it determines the petitioners are demonstrably unlikely to successfully implement the program set forth in the petition.

Area of Concern	Findings for Consideration <i>(See pages 37-53 in Detailed Analysis)</i>
Governance	<p>A. Lack of Transparency. Petitioner and proposed back office services provide, Propel, a Charter Management Group, Inc. ("Propel") appear to obscure Propel's role, and the Charter School and Propel's relationships with other charter-affiliated entities which were scrutinized in the past for related-party transactions and other improper financial interest concerns. The lack of transparency and candor during petition review is likely to carry over into RCOE's oversight responsibilities if Petition is approved. If Petitioner is not forthcoming in its responses to petition review, and subsequently to oversight, Petitioner is demonstrably unlikely to successfully implement the program.</p> <p>In its July 28, 2025 response to MUSD's denial of Petition, Petitioner declared:</p> <ol style="list-style-type: none"> <li>1. Propel will not operate or control Charter School.</li> <li>2. Charter School is not affiliated with the OFL and OFY network of charter schools.</li> <li>3. Charter School and Propel are not affiliated with John and Joan Hall.</li> </ol>

1. Operation or Control of Charter School by Propel. Petitioner states Propel will not operate or control Charter School. While Propel may not directly control the Charter School or Petitioner, Propel appears to already exert significant control and influence over Petitioner and the Petition, despite the assertions Propel is only a back office services provider:

- Propel likely caused Petition to be established, and likely picked Petitioner's board members.
- Propel submitted the Petition to MUSD, and appears to be the leading proponent of the Petition.
- Petitioner's board members do not have experience in school administration and related areas, making it likely they will rely heavily on Propel for administration and operations.
- Despite stating it does not have a contract with Petitioner, Propel already identifies Petitioner on its website as one of its partners.
- Propel is funding startup costs for the Charter School and will provide a line of credit to assist with cash flow in Charter School's first year.
- Propel describes itself as a back office services provider, when its actions suggest it more accurately serves in an unofficial charter management capacity.

2. Charter School's Relationship to the OFL and OFY Network of Charter Schools. Petitioner denies Charter School is affiliated with the Opportunities for Learning ("OFL") and Opportunities for Youth ("OFY") charter schools. While Charter School and the OFL and OFY may not be legally affiliated, they are connected to Charter School and Petitioner through Propel and its leadership team. The Review Team determined:

- Propel is the current charter management organization for the ten OFL and OFY schools.
- Propel's CEO founded Propel with 19 of her colleagues who came from former charter management organizations that operated the OFL and OFY charter schools managed by Propel today.
- After approximately four years in operation, Propel had over \$9 million in net assets, earned from its contracts with OFL, OFY, and other school entities.
- Propel is expected to provide operational and administrative

services to Charter School, and Propel provides operational and administrative services to OFL and OFY entities in its role as charter management organization (“CMO”) of those charter schools.

- Propel is funding Charter School’s startup costs, and will provide Charter School with a line of credit for first year expenses. Presumably Propel is providing these funds through its existing revenue.

3. Charter School and Propel Relationship to John and Joan Hall and related entities. Petitioner denies that Charter School and Propel are affiliated with John and Joan Hall. Concerns were initially raised by MUSD regarding these individuals and relationships because of past actions. Propel and Petitioner obscured the issues rather than directly and transparently addressing them. The Review Team determined:

- 2006 and 2007 FCMAT reports described the network of charter school, private school, and vendors providing supporting services operated and/or owned by John and Joan Hall and family members, including OFY and OFL. The reports raised concerns regarding transactions between the various entities, including improper related-party transactions, lack of written agreements, lack of adequate detail on invoices, and potentially excessive compensation of John and Joan Hall.
- Propel’s CEO is identified as a principal officer on OFY California’s Form 990 for tax years 2021 and 2022.
- Changes in law increasing transparency of charter schools and CMOs became effective the same year Propel was established. These laws: 1) prohibited for-profit CMOs from operating charter schools, but permitted nonprofit CMOs, and 2) made CMOs subject to the Brown Act, California Public Records Act, Government Code section 1090 conflict of interest laws, and the Political Reform Act.
- According to its CEO, Propel was founded to address changes in law, presumably these transparency laws.
- Despite the scrutiny of Propel’s relationship to John and Joan Hall, Propel has not been forthcoming about these relationships. Questions remain regarding: 1) the address listed on Propel’s Articles of Incorporation, which is the same street address as numerous Hall family entities, 2) Petitioner’s denial of these relationships is puzzling when it is clear relationships do exist, instead of being transparent and directly addressing these relationships, 3) Petitioner denies connections between

	<p>Charter School, OFY, and OFL, but either Propel is funding Charter School with its revenues from OFY and OFL and other schools, or Propel has an undisclosed financial resource funding the Charter School, and 4) unidentified service providers the Charter School will contract with for services, when the Hall family owns entities that provide a multitude of services to charter schools.</p>
<p>Governance</p>	<p><b>B. Petition Fails to Accurately Describe Structure for Providing Administrative Services.</b></p> <p>The Petition states it intends to contract with an “experienced back-office services provider” and intends to contract with Propel for “operational and administrative support services”.<sup>1</sup> The Petition does not elaborate on the operational and administrative support services Propel will provide, nor provide procedures for selection of service providers or set forth the criteria service providers must have to demonstrate they carry the necessary expertise. The Review Team determined:</p> <ul style="list-style-type: none"> <li>• Propel will charge a flat fee of 13.5% of the Charter School’s funding. The 3.5% will go to another entity for back office services, and Propel will retain the 10%. It is unclear what services are included within the 10% fee.</li> <li>• As described above, the Petition states Propel is not an “entity managing a charter school”, but Propel’s involvement with the Petition demonstrates it is not solely a contracting party providing services. Propel appears to be involved in activities on Charter School’s behalf that are considered “operating” of a charter school.</li> <li>• There are many unanswered questions regarding Propel’s role in establishment of Petitioner and Charter Schools, its future role and responsibilities, the reasonableness of its fees, Charter School’s ability to afford those fees, its influence over Petitioner, its actual experience with classroom based charter school management, and its lack of transparency regarding its operations and relationships.</li> </ul> <p>The failure to provide this information - indeed, the many unanswered questions regarding Propel, and the general uncertainty that creates</p>

<sup>1</sup> Petition, p. 213.

	about the Charter School and its operations - make it demonstrably unlikely Petitioner will successfully implement the program.
Fiscal	<p>C. Petition Proposes an Unrealistic Financial Plan; Financial Plan does not Demonstrate Adequate Financial Resources or Seriousness of Financial Undertaking Required to Open a New Charter School Program.</p> <p>The Petition's support documents do not include reasonable estimates of start-up costs, cash flow, or expenditures necessary to operate the school. Concerns exist regarding estimated expenditures for facilities, furniture, professional consulting fees, the architect consulting fees, and salary and retirement costs. Charter School intends to build a new state-of-the-art campus to house its program beginning with the opening of its school, but there is insufficient detail to determine if the proposed facilities' estimated expense is reasonable, and how expenses will be managed if enrollment and funding falls significantly short of Petition's estimates.</p>
Governance	<p>D. Lack of Experience Operating Proposed Educational Program.</p> <p>The Petition does not demonstrate that Petitioner has sufficient prior experience operating a <u>classroom-based</u> Charter School program. The lack of experience of Petitioner, Petitioner's Board, and Propel in operating a classroom based California charter school, the vulnerability created by that lack of experience, and the evidence of this lack of experience in the Petition, make it demonstrably unlikely Petitioner will successfully implement the program presented in the Petition.</p>
Facilities	<p>E. Lack of Realistic Facilities Plan.</p> <p>Petitioner's plan to provide facilities for its classroom based program is underdeveloped, even though Petitioner ambitiously intends to develop a state-of-the-art campus. There is no backup plan presented for an existing facility if construction is not completed in time. Without a realistic plan for facilities, it is demonstrably unlikely Petitioner will be able to successfully implement the program.</p>
Enrollment/ Fiscal	<p>F. Lack of Demonstrated Support or Community Need for Proposed Charter School.</p> <p>Petitioner is demonstrably unlikely to successfully implement the program due to a lack of community support and need, which impacts</p>

their ability to achieve aspirational enrollment goals, and be financially sustainable, particularly given the ambitious planned state-of-the-art facility.

#### 4. Does Not Include Signatures

The Board has the authority to deny a charter petition if it determines it does not contain the number of signatures required by subdivision (a) of Education Code section 47605.

##### Findings for Consideration

No Findings Determined.

#### 5. Does Not Include Affirmations

The Board has the authority to deny a charter petition if it determines it does not contain an affirmation of each of the conditions described in subdivision (e) of Education Code Section 47605.

##### Findings for Consideration

No Findings Determined.

#### 6. Employer Declaration Not Provided

The Board has the authority to deny a charter petition if it determines it does not contain a declaration whether or not the charter school shall be deemed the exclusive public employer of the employees of the charter school for purposes of Chapter 10.7 of Division 4 of Title 1 of the Government Code.

##### Findings for Consideration

No Findings Determined.

## 7. Community Interests Not Served

The Board has the authority to deny a charter petition if it determines the charter school is demonstrably unlikely to serve the interests of the entire community in which the school is proposing to locate.

### Findings for Consideration

No Findings Determined.

END OF PART I.

*Refer to page 1 Proposed Options for Board Action*

**Part II. DETAILED ANALYSIS: Staff Report for  
Bridges of Promise Academies**

**Riverside County Office of Education**  
**Staff Report**  
**Bridges of Promise Academies**  
**Petition to Establish a Charter School**  
**October 21, 2025**

**PROCEDURAL BACKGROUND**

On May 2, 2025, petitioners submitted a charter petition (“Petition” or “Charter Petition”) to the Menifee Union School District (“MUSD”), proposing to establish Bridges of Promise Academies (“Charter School”) as a TK-8 classroom-based charter school authorized by MUSD under Education Code section 47605. According to the Petition, the Charter School will be operated and governed by Bridges of Promise Academies, Inc. (“Nonprofit” or “Petitioner”), a California nonprofit corporation incorporated on June 20, 2024, and submitted to the California Secretary of State on June 26, 2024. Nonprofit’s Articles of Incorporation identify Nonprofit’s purpose to create, operate, and manage one or more primary or secondary public charter schools. On July 29, 2025, MUSD denied the Charter Petition.

On August 8, 2025, the Charter Petition was timely submitted on appeal to the Riverside County Board of Education (“Board” or “County Board”) within 30 days of MUSD’s denial. (Ed. Code, § 47605(k).) The Petition, although not explicitly stated, proposes to begin administrative operations upon approval of the Petition, and open to students, initially in grades TK-4, in the 2027-28 school year, with an initial term ending on June 30, 2032. Essentially, the Petition proposes a six-year, eight-month term from time of approval.

The Petition states the proposed Charter School will be operated by Nonprofit. Charter School will be the first charter school operated by Nonprofit.

The County Board held a public hearing (“Public Hearing”) on October 1, 2025, to consider the terms of the Petition and the level of support for the proposed Charter School by parents/guardians, teachers, and community members. The Board is required to take action to either grant or deny the Petition within 90 days of receipt, unless the parties agree to a 30-day extension. (Ed. Code, § 47605(b).) The Board is scheduled to take action on the Petition at its November 5, 2025 meeting.

Riverside County Office of Education (“RCOE”) staff and legal counsel (“Review Team”) reviewed the Petition and developed proposed findings of fact for consideration by the Board. This report and any other staff recommendations shall be published at least 15 days before the public hearing at which the Board will either grant or deny the charter. (Ed. Code, § 47605(b).)

## LEGAL CONSIDERATIONS

### General Review Criteria

The Charter Schools Act (“Act”) governs the creation of California charter schools and provides standards and criteria for reviewing a charter petition. Under the Act, a county board of education reviewing a charter petition on appeal “shall not deny” the petition unless it makes written factual findings setting forth specific facts to support one or more of the following: (Ed. Code, § 47605(b), (k).)

1. The charter school presents an unsound educational program for the students to be enrolled in the charter school.
2. The petitioner is demonstrably unlikely to successfully implement the program set forth in the petition.
3. The petition does not contain the required number of signatures.
4. The petition does not contain an affirmation of each of the conditions described in Education Code section 47605(e).
5. The petition does not contain reasonably comprehensive descriptions of all of the following:
  - a. Educational program, including annual goals for all pupils and pupil subgroups, and actions to achieve those goals
  - b. Measurable pupil outcomes identified for use by the charter school, aligned with the state priorities
  - c. Method by which pupil progress in meeting outcomes is to be measured
  - d. Governance structure, including process to ensure parental involvement
  - e. Employee qualifications
  - f. Health and safety procedures
  - g. Means to achieve a balance of racial and ethnic pupils, special education pupils, and English learner pupils that is reflective of the general population residing within the territorial jurisdiction of the county
  - h. Manner for conducting annual, independent financial audits
  - i. Suspension and expulsion procedures
  - j. Retirement systems
  - k. Dispute resolution procedures
  - l. Admission policies and procedures
  - m. Public school attendance alternatives within the county
  - n. Employee return rights
  - o. School closure procedures
6. The petition does not include a declaration of whether the charter school shall be deemed the exclusive public school employer of its employees under the Educational Employment Relations Act.

7. The charter school is demonstrably unlikely to serve the interests of the entire community in which the school is proposing to locate. Analysis of this finding shall include consideration of the fiscal impact of the proposed charter school.
8. The school district where the charter will locate is not positioned to absorb the fiscal impact of the proposed charter school.

Charter petitions are also required to include a description of the facilities to be utilized by the proposed charter school, how administrative services will be provided, potential civil liabilities for the chartering authority, and a three-year projected operational budget and cash flow. (Ed. Code, § 47605(h).)

### **Petitioner Appeal Rights**

If the Board approves the Petition, it will be the chartering authority for the Charter School and RCOE will have oversight responsibility. If the Board denies the Petition, Petitioner may appeal the denial to the State Board of Education ("SBE"). (Ed. Code, § 47605(k).) The SBE may either hear the appeal or summarily deny review based on the documentary record. If it hears the appeal, the SBE may affirm MUSD's determination, the Board's determination, or both, or may reverse only upon finding that there was an abuse of discretion by both MUSD and the Board. (Ed. Code, § 47605(k)(2)(E).)

### **FINDINGS FOR CONSIDERATION**

The Review Team has identified the following possible findings for the Board's consideration: (1) The Petition does not contain a reasonably comprehensive description of each of the required elements, (2) The Charter School presents an unsound educational program for students to be enrolled in the Charter School, and (3) Petitioner is demonstrably unlikely to successfully implement the program set forth in the Petition.

## Recommended Reasons for Denial

Descriptions Not Comprehensive	Unsound Educational Program	Demonstrably Unlikely to Successfully Implement the Program
Element A: Educational Program	Concerns re: English Learner Program and English Language Development Framework	Lack of Transparency
Element B: Measurable Pupil Outcomes	Concerns re: Serving the Needs of Students with Disabilities	Distorted Structure for Providing Administrative Services
Element C: Method of Measuring Pupil Progress	Failure to Acknowledge Mandatory Reading Screener	Unrealistic Financial Plan
Element D: Governance Structure		Inexperience Operating Proposed Program
Element E: Employee Qualifications		Unrealistic Facilities Plan
Element F: Health and Safety		Undemonstrated Community Support & Need
Element J: Suspension/Expulsion Procedures		

Figure 1

**1. The Petition does not contain a reasonably comprehensive description of each of the required elements.**

**A. Element A: Lacking Reasonably Comprehensive Description of Educational Program.**

**1. Charter School Appears not to Serve a Specific Target Population**

*Includes target population: grade levels, enrollment, educational interests, backgrounds, and challenges. (5 CCR § 11967.5.1(f)(1)(A).)<sup>2</sup>*

While the Petition describes the grade levels to be served and anticipated enrollment projections, it does not comprehensively describe the school's target student population. It instead describes a broad, generic range of groups that effectively encompasses all students. It identifies students from varying socioeconomic backgrounds, English learners, students with disabilities, and students achieving substantially above or below grade-level expectations as its "target" population (Petition, p. 39). Elsewhere it refers to students from diverse backgrounds, including low-income families and English learners (Petition, p. 42), and emphasizes meeting "the diverse learning needs of all students" through blended learning (Petition, p. 83).

The Petition does not comprehensively or clearly identify how the Charter School will meet the needs of its (undefined) target population. It offers generally that the Charter School will provide a "distinctive" option for those seeking a smaller school setting. But, as discussed in Section 3(f) of this report, the Petition lacks data supporting the community need for the Charter School. The Petition lists demographics in its anticipated geographic area (Petition, pp. 186-187), but fails to identify targeted student needs or explain how the Charter School offers an educational program designed to meet those needs. (Petition p. 22-23.)

Taken together, these statements indicate that the Charter School is positioning itself to serve all students rather than a specific population with identified needs and challenges. As a result, the Petition does not demonstrate a focused or compelling rationale for how its program is uniquely designed to meet the needs of a clearly defined group of students.

**2. Inadequate Framing of Student Needs**

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<sup>2</sup> The State Board of Education promulgated the "Criteria for the Review and Approval of Charter School Petitions and Charter School Renewal Petitions by the State Board of Education (SBE)". Although the SBE no longer authorizes charter schools, its regulations defining the scope and contents of a "reasonably comprehensive" charter petition, an "unsound educational program", and "demonstrably unlikely to successfully implement the program" remain valid.

*Includes a framework for instructional design that is aligned with the needs of the pupils that the charter school has identified as its target student population. (5 CCR § 119967.5.1(f)(1)(C).)*

The Petition claims it will meet the “diverse academic needs” of students, by using a combination of the following instructional frameworks: (1) Project-Based Learning (“PBL”) enhanced by Place-Based Education (“PBE”); (2) Social-Emotional Learning (“SEL”); (3) rigorous standards-based curriculum; and (4) blended learning. (Petition, pp. 39-40.) Although the Petition generally describes the benefits of the instructional framework, it fails to describe how the Charter School’s framework will effectively address the needs of the targeted student population. For example, the Petition recognizes a disparity in academic achievement in math and English for certain student groups (Petition, p. 19) but fails to state how PBL, PBE, SEL or blending learning is an effective method for reducing that disparity. Instead, the Charter School will “fulfill this need by designing projects aligned with state standards, we ensure rigorous academic instruction that meets the needs of all learners.” (Petition, p. 19.) Statements like these offer educational jargon, not a substantive comprehensive explanation that allows the reader to thoroughly assess the education program being proposed by the Charter School.

Moreover, Petitioner’s framing of “diverse academic needs” limits those needs almost exclusively to students with disabilities, English learners, and students from low-income backgrounds. In several passages, the Petition cites “IEPs, students with disabilities, English language learners, and low-income families” as representative of students with “needs.” This framing reduces academic needs to demographic or categorical identifiers, suggesting that students outside of these groups do not present academic needs.

First, by equating academic needs with poverty, disability, or English learner status, the Petition misunderstands developmental variability, which affects all students and requires universal design approaches. Second, it overlooks systemic frameworks designed to serve all learners, not only specific subgroups. Third, it ignores advanced learners, who have well-documented needs for enrichment and acceleration. Fourth, it conflates rights protections of students with disabilities (IEP/504) with the broader responsibility of schools to plan for academic variability across the entire student body.

Ultimately, the Petition adopts a deficit perspective that equates academic needs exclusively with student subgroups defined by disability, language status, or socioeconomic background. This framing reflects a misunderstanding of child development, ignores universal system structures such as MTSS and UDL, and fails to account for the needs of advanced learners. Absent evidence of a coherent, systemic

plan to serve the full developmental spectrum; the Petition does not provide a credible or research-aligned approach to meeting diverse academic needs.

### **3. Petitioner's Instructional Approach Does Not Enable Mastery of Content Standards**

*Indicates the instructional approach or approaches the charter school will utilize, including, but not limited to, the curriculum and teaching methods (or a process for developing the curriculum and teaching methods) that will enable the school's pupils to master the content standards for the four core curriculum areas adopted by the SBE pursuant to Education Code section 60605 and to achieve the objectives specified in the charter. (5 CCR § 11967.5.1(f)(1)(E).)*

The Petition states Charter School will implement a variety of instructional approaches, without evidence that the combination will enable students to master content standards. The Petition presents Charter School as a Project-Based Learning (PBL) school built on the Buck Institute's Gold Standard model, repeatedly highlighting the seven PBL elements as the foundation of its instructional design (Petition, pp. 40–41). However, the program as described relies on Savvas, a traditional standards-based curriculum, as the instructional spine, with PBL layered on top to reinforce those standards (Petition, p. 42.) The Petition fails to describe how integrating these two models is beneficial for students. The daily schedule further illustrates this disconnect, with core academic instruction delivered in the morning and PBL reserved for afternoon blocks (Petition, p. 73), and the school committing to only four schoolwide PBL units per year (Petition, p. 86). Taken together, these details demonstrate that the program is not fully aligned with the Gold Standard PBL framework it claims to adopt. Instead, the Petition contradicts itself by marketing Charter School as a true PBL school while describing a traditional, standards-based model in which PBL functions as a supplemental strategy rather than the central pedagogy. This concern is further compounded when examining subjects and grade spans. In mathematics and ELA, the Petition describes heavy reliance on Savvas programs that are primarily skills-based, text-driven, and worksheet-oriented, without explaining how standards in these subjects would authentically be taught through projects. While science and social studies lend themselves more naturally to PBL, the Petition does not provide examples of how Savvas units will be fully integrated into sustained, inquiry-based projects rather than delivered separately. Similarly, for younger students in TK–2, who developmentally require more scaffolded instruction and less independent project work, the Petition does not explain how PBL will be adapted beyond surface-level enrichment activities. As a result, the description leaves unclear whether students across grade levels and subjects will experience a true PBL program, or a traditional, textbook-driven curriculum supplemented with occasional projects.

#### **4. Petition does not Adequately Respond to Pupil Needs Achieving Below Expected Levels**

*Indicates how the charter school will identify and respond to the needs of pupils who are not achieving at or above expected levels. (5 CCR § 11967.5.1(f)(1)(F).)*

The Petition does not provide a comprehensive description of how it will meet the needs of students performing below or substantially below grade level. While it identifies these students as part of its target population (Petition, p. 39), its proposed supports rely on broad references to blended learning, differentiation, and tiered interventions without specifying evidence-based programs, staffing roles, or clear procedures for intensive remediation. The Petition does not describe how such students will be identified for additional support, how interventions will be escalated, or how progress will be monitored. As a result, the plan lacks sufficient detail to demonstrate that the school will be able to systematically address the needs of students significantly below grade-level expectations.

The Petition's description of placing students "in tiers by standard" further raises concerns about the Petitioners' comprehensive understanding of MTSS. On pages 97–98, the Petition states that teachers will "better understand student tier levels by standard," giving the example of a student who might be Tier 1 in science but require Tier 2 or Tier 3 support in specific English language arts standards. This framing appears to limit interventions to academic standards, rather than acknowledging that MTSS is intended to provide a cohesive, whole-student framework of academic, behavioral, and social-emotional supports. Assessing students by curriculum standards is inconsistent with best practices which require implementation of universal screening tools and schedules for academic and social emotional indicators. This "tiers by standard" approach would be impractical for teachers to implement and track across multiple standards and subjects because it diverts focus from systemic, schoolwide interventions. The description suggests that the Petitioners either do not have a clear or accurate understanding of how MTSS is designed to function or an underdeveloped MTSS strategy, which undermines confidence in their capacity to successfully implement the model as described.

The Petition's description of MTSS/Response to Intervention (RTI) is further undermined by its treatment of socioeconomically disadvantaged (SED) students. On page 97, it states: "If the data indicates that a socio-economically disadvantaged student is struggling, they will be referred to the MTSS team". By singling out this group, the Petition departs from the intended universal design of MTSS, which requires that all students be screened and supported through tiered interventions as needed. Moreover, this framing makes an implicit assumption that SED students will be more likely to struggle academically than their peers, reflecting a deficit-based perspective rather than an equity-focused plan. Together, these statements highlight

a limited and inconsistent understanding of how MTSS is meant to function in practice.

The Petition identifies students “achieving substantially above or below grade level expectations” as part of its target student population (Petition, p. 39) and states that its instructional framework—built on Project-Based Learning, blended learning, and differentiation—will meet the needs of all learners (Petition, pp. 39–40). It further notes that blended learning will create “environments where differentiation, individualization, and personalization are the norm for all instruction levels” (Petition, p. 83) and that teachers will be responsible for designing instruction “appropriate for all students” (Petition, p. 159). However, the Petition does not describe a specific or comprehensive plan for meeting the needs of students performing substantially above grade level, such as clear identification procedures, acceleration pathways, or advanced enrichment opportunities. Instead, it relies on generalized approaches like differentiation and project-based learning without detailing how these methods will be systematically applied to students significantly beyond grade-level expectations. As a result, the Petition does not provide a sufficiently clear plan for how it will meet the needs of students performing substantially above grade level.

Collectively, these shortcomings — the lack of a plan for students substantially below and above grade level, the focus on intervention by academic standard and the singling out of socioeconomically disadvantaged students — demonstrate that the Petitioners are not demonstrably likely to successfully implement the MTSS/RTI framework they describe. Without a coherent, comprehensive plan aligned with California best practices, the Petition does not show that the school will be able to provide the systematic interventions required to meet the diverse needs of its student population.

#### **5. Petition Does not Provide a Reasonably Comprehensive Description of how the Charter School will Meet the Needs of Students Eligible to Receive Special Education Services**

*Specifies the charter school's special education plan, including, but not limited to, the means by which the charter school will comply with the provisions of Education Code section 47641, the process to be used to identify students who qualify for special education programs and services, how the school will provide or access special education programs and services, the school's understanding of its responsibilities under law for special education pupils, and how the school intends to meet those responsibilities. (5 CCR § 11967.5.1(f)(1)(H).)*

The Petition recites Individual with Disabilities Education Act (IDEA) timelines and Section 504 obligations; the section is largely composed of boilerplate language that assumes the Charter School will function as a school of the district or county SELPA. The county office does not provide the full continuum of special education services,

and only provides services referred to by a students' district of residence. The Petition does not provide an alternative plan for operating as its own LEA through membership in a charter SELPA, nor does it describe how the Charter School will structure or deliver services once students with disabilities are identified. The description of Multi-Tiered Systems of Supports (MTSS) is vague and underdeveloped, and the complete absence of any detail about program models, service delivery, or staffing raises significant concerns about the school's capacity to implement a coherent and legally compliant special education program.

**a. Petition Designates Charter School as School of the County Office of Education for Special Education Purposes**

Education Code section 47641 requires Charter School in its petition to state whether Charter School shall be deemed a public school of the authorizer for purposes of special education, or will act as their own LEA. Here, the Petition states that it will be a school of the district for special education unless and until it elects to become its own LEA (Petition, p. 91). Since the Petition is on appeal to the County Board, references to the school district are replaced with references to the county office. Therefore, under this choice, the county office becomes responsible for providing a full continuum of special education services to eligible Charter School Students. Although the declaration in the Petition technically complies with Education Code § 47641(b), it fails to adequately address this scenario – the county office designated as the LEA for special education services. This default choice places the responsibility for providing and funding special education services on the county office who will receive funding for Charter School's students through Riverside County SELPA ("SELPA"). As the entity responsible for providing special education, the county office by default assumes all oversight, compliance and liability in connection with these services including conducting due process proceedings. Alternatively, the Charter School may elect to apply to the SELPA. However, SELPA may deny Charter School's application if it fails to meet all the membership requirements, in which Charter School would remain a school of the county office for special education purposes, or could apply for membership in a charter-only SELPA as its own LEA if the Petition were to be approved.

The Petition's statement that the Charter School will follow county office policies for special education does not squarely fit in this scenario because the county office has never been required to provide the full continuum of special education services. Importantly, the county office does not enroll students and assume responsibility for providing FAPE. Instead, the county office offers regionalized and low-incidence programs (e.g., deaf/blind, orthopedic impairments), not the complete range of mild/moderate and general education disability services required for a charter school population, upon referral from a student's district of residence. Districts that refer students to county office programs remain the students LEA for special education, and receive funding for those students through the SELPA. As a result, the Petition leaves

a significant gap in how students with disabilities will actually be served, since the county office has never assumed the role of a traditional school district. This leaves an incomplete description, as the Petitioner's special education plan because, except for agreeing to enter into a special education memorandum of understanding, it fails to identify how the county office will deliver a full continuum of services in conjunction with the Charter School.

The Petitioners could have easily anticipated the possibility of appeal to the County Board and addressed how services would be provided if authorized by an entity that is not structured like a district. Their failure to do so suggests a lack of understanding of the county office's role in delivering special education services. As written, this leaves the plan incomplete and potentially unsound, as it assumes a structure that does not exist and does not identify how the full range of special education services will be provided if the county office is the authorizer.

## **2. MTSS and Referral Process**

The Petition references an MTSS team and an eight-week Response to Intervention process as central to the referral pathway for students with suspected disabilities (Petition, pp. 92–93). However, the description of MTSS is underdeveloped. The Petition does not identify the composition or qualifications of the MTSS team, the types of interventions and supports available during the intervention period, how progress will be monitored, or how often the team will meet. In addition, the language could be read to suggest that a student must complete an eight-week RTI cycle before being referred for assessment, which is inconsistent with legal requirements under child find that allow for referral at any point a disability is suspected. As written, the MTSS section is not reasonably comprehensive and does not provide confidence that the school has developed a coherent, legally compliant system to identify and support students with disabilities.

## **3. Confusing Description of Service Delivery Models**

Petitioners state they will be a school of the county office for purposes of providing special education, but in the same breath they assume the role of providing special education instruction and services. (Petition, p.91.) Petitioners also state they will conduct due process hearings, adopt complaint procedures regarding special education and seek "advice and guidance" from the county office and the SELPA, which would circumvent the county office's role as the LEA responsible for providing special education services.

Significantly, the Petition fails to provide sufficient detail about how special education services will be structured or delivered to students once identified, except that Charter School will provide "all curriculum, classroom materials, classroom modifications and assistive technology" from qualified staff. (Petition, pp. 94-95.)

There is no explanation of whether services will be provided through push-in support, pull-out resource specialist services, special day classes, or itinerant models. The Petition does not outline how the Charter School will provide the required continuum of placement options, nor does it differentiate how services would be delivered to students with mild/moderate versus moderate/severe disabilities. There is no discussion of how related services such as speech and language, occupational therapy, or counseling will be provided, no information on staffing ratios or caseloads, and no grade-level distinctions in program planning. The complete absence of any service model detail makes it impossible to determine whether the school has the capacity to provide appropriate services to students with disabilities, and strongly suggests that the petitioners have not engaged in meaningful planning for this critical area.

#### **6. Petition Does not Describe a Comprehensive Plan to Achieve Annual Goals within the Eight State Priorities for all Grade Levels**

*The annual goals for the charter school for all pupils and for each subgroup of pupils identified pursuant to Section 52052, to be achieved in the state priorities, as described in subdivision (d) of Section 52060, that apply for the grade levels served, and specific annual actions to achieve those goals. A charter petition may identify additional school priorities, the goals for the school priorities, and the specific annual actions to achieve those goals. (EC § 47605(c)(5)(A)(ii).)*

While the Petition includes actions aligned to each state priority, the descriptions are largely generic and restate that they will implement the program rather than outlining concrete strategies. For example, actions such as “implement a rigorous curriculum,” “provide training to teachers,” “implement RTI with a robust MTSS process,” and “implement an SEL program” describe requirements that are assumed in any school, not additional steps the school will take to ensure success. Similarly, several actions overlap with the goal statements themselves and read more like aspirations than operational commitments. The Petition does not provide specific, differentiated actions that show how the school will recruit and retain qualified teachers, ensure effective intervention services, or build targeted family engagement strategies for subgroups such as English learners, foster youth, and students with disabilities. As a result, the actions section does not demonstrate a comprehensive or credible plan to achieve the stated goals and instead reinforces concerns that the Petition is aspirational in nature rather than grounded in detailed planning. In contrast, a fully developed petition would provide actions that go beyond baseline program implementation and clearly describe the authentic strategies the school will employ to ensure its goals are met. For example, instead of simply stating “recruit and retain qualified teachers,” the Petition could identify specific partnerships with local teacher preparation programs, plans to offer induction support, or strategies to provide competitive compensation. Rather than broadly stating “implement RTI with a robust MTSS process,” the Petition could outline the frequency of progress monitoring, describe the intervention blocks in the master schedule, and identify the evidence-

based programs to be used for literacy and math support. By failing to provide this level of specificity, the Petition does not show that it has engaged in the detailed and authentic planning necessary to translate aspirational goals into actionable commitments.

## **B. Element B: Measurable Pupil Outcomes**

### **1. Measurable Pupil Outcomes Lack Specificity**

*Specify skills, knowledge, and attitudes that reflect the school's educational objectives and can be assessed, at a minimum, by objective means that are frequent and sufficiently detailed enough to determine whether pupils are making satisfactory progress. It is intended that the frequency of objective means of measuring pupil outcomes vary according to such factors as grade level, subject matter, the outcome of previous objective measurements, and information that may be collected from anecdotal sources. To be sufficiently detailed, objective means of measuring pupil outcomes must be capable of being used readily to evaluate the effectiveness of and to modify instruction for individual students and for groups of students. (5 CCR § 11967.5.1 (f)(1)(2).)*

While the Petition identifies student learning outcomes such as subject proficiency, emotional intelligence, growth mindset and resilience, and balanced lifestyle (Petition, pp. 109-114), but many of the outcomes are difficult to assess objectively rather than subjectively. Further, the Petition lists a variety of objective measures of pupil outcomes, including various assessments like SBAC<sup>3</sup>, NWEAMAP<sup>4</sup>, ELPAC<sup>5</sup>, attendance, and discipline data (Petition, pp. 114-121), it does not sufficiently describe how all these outcomes will be assessed. The Petition also fails to describe how the frequency of these assessments will be varied appropriately according to grade level or subject matter. For example, the Petition does not describe how younger students in grades K-2 will be monitored more frequently for foundational literacy or numeracy skills, or how formative assessments will be used to adjust instruction in core content areas throughout the year. In addition, while the petition identifies statewide and local assessments, it does not explain how these measures will be used to evaluate the effectiveness of instruction and to make timely modifications for individual students or groups of students. Many of the listed assessments, such as SBAC, occur too infrequently to inform instruction in real time, and the Petition provides little detail on how interim or classroom-based assessments will be used systematically to guide teaching and learning. As a result, the petition does not present a reasonably comprehensive plan to ensure that assessment data is

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<sup>3</sup> Smarter Balanced Assessment System: <https://www.cde.ca.gov/ta/tg/sa/>

<sup>4</sup> Northwest Evaluation Association (NWEA) offers two “MAP” assessment, MAP Growth and MAP Reading Fluency.

<sup>5</sup> English Language Proficiency Assessment: <https://www.cde.ca.gov/ta/tg/ep/>

varied and applied in ways that improve instruction and support pupil progress across grade levels and subject areas.

### **C. Element C: Method of Measuring Pupil Progress**

#### **1. Petition Lacks Detail Explaining How Pupil Progress will be Measured**

*Utilizes a variety of assessment tools that are appropriate to the skills, knowledge, or attitudes being assessed, including, at a minimum, tools that employ objective means of assessment consistent with paragraph (2)(A) of subdivision (f) of this section.(5 CCR § 11967.5.1 (f)(3).)*

The Petition identifies statewide and local assessments, including SBAC, CAST, ELPAC, and NWEA MAP (pp. 114–121). However, it does not include California’s required K–2 reading screener, which will be mandated during the Charter term. Despite identifying the statewide and local assessments that will be utilized, the Petition lacks details explaining how grading will be implemented. Petitioners provide an example rubric for PBL projects, which provides a score of 4 for exemplary and 1 for beginning. However, the Petition does not describe how/if this will be implemented into mastery grading, nor how any grades will be transferrable to the high school setting given the mastery grading (i.e., no letter grade) model.

### **D. Element D: Governance Structure**

#### **1. Governance Structure does not Reflect a Seriousness that Charter School Will Become a Viable Enterprise**

*The governance structure of the school, including, but not limited to, the process to be followed by the school to ensure parental involvement in supporting the school’s effort on behalf of the school’s pupils, as required by Education Code section 47605(c)(5)(D), at a minimum: (A) Includes evidence of the charter school’s incorporation as a non-profit public benefit corporation, if applicable. (B) Includes evidence that the organizational and technical designs of the governance structure reflect a seriousness of purpose necessary to ensure that: 1. The charter school will become and remain a viable enterprise. 2. There will be active and effective representation of interested parties, including, but not limited to parents (guardians). 3. The educational program will be successful. (5 CCR § 11967.5.1 (f)(1)(4).)*

The Petition’s organizational chart is extremely limited, showing only the general categories of Board of Directors, Principal, classified staff, and certificated staff. It omits identifying key roles/titles, and persons that will fulfill key roles necessary for the school’s operations, which creates an inference that Charter School will heavily rely on Propel, a

Charter Management Group, Inc. (“Propel”) who the Charter School asserts is their proposed back-office provider, and other service providers for day-to-day operations. If Propel’s relationship with Charter School is only contractual, then that relationship can easily be severed, and Nonprofit could be left insufficiently prepared to operate a Nonprofit without the requisite knowledge and experience.

The board member biographies reflect individuals with passion for youth development and community service, but they do not demonstrate the breadth of expertise typically expected for effective charter school governance. Based on the information submitted to the County Board, the governing board lacks experience in school administration, school curriculum and instruction, school accounting and finance, school business management, and school facilities development—areas critical for oversight of a public school’s academic program, fiscal management, and compliance obligations—and, critically, development and implementation of a new charter school and all of its components. Furthermore, they lack expertise in Project Based Learning (PBL), which is a foundational aspect of the proposed education program. Without expertise from Petitioner’s governing board, they are reliant on their consultants.

Propel, who is identified as a proposed “back office” services provider for the Charter School, appears to have the most experience and skill with implementing the proposed education program, however Propel’s role in the Petition is purportedly limited. Petitioners and Propel deny Propel is an entity managing a charter school (i.e., a Charter Management Organization or “CMO”) despite Propel being the primary proponent of the Petition and Charter School—for example, admitting at the Public Hearing that Propel had expended its own funds to develop the Petition and related activities. Propel’s involvement with establishing the Charter School appears to exceed the role of a consultant or a back office service provider. Propel’s involvement includes submitting the initial Petition to MUSD, lobbying MUSD and the County Board for approval of the Petition, funding startup costs as necessary, and, according to Exhibit 11, page 5 of the Petition, providing Charter School with a line of credit to assist with cash flow during the initial year. Indeed, page 213 of the Petition states the Charter School “intends” to contract with Propel, which appeared to be confirmed at the Public Hearing (although contradicted on page 12 of Petition, which states the Nonprofit “has contracted” with a list of external consultants that includes Propel). As presented, the governance structure does not clearly reflect the seriousness of purpose necessary to ensure the Charter School will become and remain a viable enterprise, and reflects a lack of transparency regarding the role of Propel in managing the Charter School.

While the Petition includes a section on fiscal controls, the description is generic and not reasonably comprehensive. It lists common best practices such as segregation of duties, independent bank reconciliations, use of prenumbered documents, two signatures on checks, and Board approval for purchases above a set amount. However, these measures are presented as policies the school “will adopt” rather than as existing, board-adopted

fiscal policies. Thresholds for expenditures are not specified, roles and responsibilities for oversight are not clearly assigned, and there is no mention of a fiscal policy manual, audit committee responsibilities, or procedures for responding to audit findings. As written, the fiscal control section reflects boilerplate language and does not demonstrate that the Petitioners have established the concrete systems necessary to safeguard public funds and ensure accountability.

In addition, the Petition provides only a generic statement that purchases or contracts above a dollar amount, to be set by the Nonprofit Board, will require Nonprofit Board approval. Beyond this, it does not outline how contracts for services will be procured, reviewed, or monitored. The absence of comprehensive contracting policies leaves significant gaps in transparency and accountability and heightens the risk of conflicts of interest.

This concern is amplified by the lack of transparency around the Nonprofit's relationship with Propel. While the Petition minimizes or denies Propel's role as a CMO, there is evidence that Propel will be providing significantly more than back-office support, and potentially operational support.

#### **E. Element E: Employee Qualifications**

*Identify general qualifications for the various categories of employees the school anticipates (e.g., administrative, instructional, instructional support, non-instructional support). The qualifications shall be sufficient to ensure the health, and safety of the school's faculty, staff, and pupils. (5 CCR § 11967.5.1 (f)(5)(A).)*

The Petition identifies Project-Based Learning (PBL) and Place-Based Education as the foundation of its instructional model, yet the qualifications for key leadership and instructional support positions do not reflect this focus. The Principal and Assistant Principal positions make no reference to PBL experience, and the Teacher on Special Assignment (TOSA) role lists it only as a preference rather than a requirement. Most concerning, the Learning Design Coach—whose duties center on coaching and supporting teachers in the implementation of PBL—has no requirement or preference for prior PBL experience. By contrast, the school counselor position oddly lists PBL experience as “preferred,” even though counseling does not center on instructional design. This misalignment suggests that the Petitioners may not fully understand the qualifications necessary to staff a PBL-focused school. The absence of PBL expertise as a requirement for the roles responsible for leading and supporting instruction undermines the credibility of the staffing plan and raises questions about the Charter School’s capacity to implement its stated educational model.

While the Petition proposes to serve students in grades TK–8, the leadership and support positions described in the employee qualifications section do not require or even prefer middle school experience. The Principal, Assistant Principal, Learning Design Coach, and

Teacher on Special Assignment all list elementary teaching or leadership experience as preferable, but make no mention of middle school qualifications. Even the school counselor is described with general or elementary-oriented requirements. Only classroom teachers at the middle school level are expected to bring prior middle school experience. This creates a mismatch between the grade span the Charter School intends to serve and the expertise of the leadership team, raising concerns about the school's capacity to provide appropriate instructional leadership, behavioral supports, and program development for grades 6–8.

The Petition's description of TK teacher qualifications raises serious concerns about the school's readiness to serve transitional kindergarten students. The qualifications describe TK teachers as responsible for "adapting and modifying the kindergarten curriculum," which is not appropriate since TK has its own standards and developmental expectations that differ from kindergarten. Additionally, there is no requirement that TK teachers hold language authorizations to support English Learners. While students are not formally identified as ELs until kindergarten, TK teachers are nonetheless expected to provide linguistically responsive instruction to emergent bilinguals. The omission of this requirement is especially concerning given that the Petition's English Learner program description does not recognize or address the unique needs of TK students. Taken together, these shortcomings demonstrate that the Petitioners do not fully understand the instructional and staffing requirements necessary to operate a high-quality TK program that aligns with state expectations.

The Petition's description of the Special Education Coordinator position raises significant concerns about feasibility and capacity. The required credential is vaguely described as a "valid California Education Specialist credential (or equivalent)" without specifying whether it must authorize service for Mild/Moderate Support Needs, Extensive Support Needs, or other specialized areas. This lack of clarity leaves uncertain whether the Coordinator would be qualified to support the full range of students the school will enroll, including those with autism, moderate to severe disabilities, or low-incidence conditions. In addition, the position requires only three years of experience yet places responsibility for teaching, monitoring compliance, coordinating and facilitating evaluations, arranging outside services, overseeing implementation of accommodations, and providing schoolwide parent and teacher support on one individual. For a TK–8 program projected to serve nearly 800 students, these expectations are unrealistic for a single coordinator. The Petition does not provide an anticipated enrollment of Students with Disabilities (SWD); however, if Charter School were to achieve comparative enrollment to MUSD, the percentage of SWD would be approximately 14.9%. Using this percentage would equate to one FTE for approximately 65 students in year one to 117 students in year five. The Petition does not describe how this role would be supported or how the Charter School will ensure students across disability categories receive appropriate services, leaving its special education staffing plan incomplete and not reasonably comprehensive.

The Petition's teacher qualification descriptions for middle school are inaccurate and misleading. It allows for either Single Subject or Multiple Subject credentials in both elective and core subjects, despite describing a departmentalized model for grades 7–8 with separate courses in English Language Arts, Math, Science, Social Studies, and stand-alone electives such as PE, arts, and world language. In a departmentalized middle school program, these courses must be taught by teachers with Single Subject credentials or Multiple Subject credentials with the appropriate supplementary authorizations; Multiple Subject credentials alone are not sufficient. Even in a middle school core setting, a Multiple Subject credential cannot be used to teach departmentalized non-core electives such as PE, arts, or world language. The Petition's phrasing, including the statement "multiple subject teaching credential including world languages," is not a valid credential category and appears to confuse supplementary authorizations with base credentials. If this language was intended to reference supplementary authorizations, it is inaccurately stated and demonstrates a fundamental misunderstanding of credentialing standards. As written, the Petition misstates credentialing requirements and creates a significant risk of teacher misassignments in grades 7–8. Authorizers, such as RCOE, are responsible for monitoring such misassignments.

Finally, the Petition's description of qualifications for Instructional Aides is confusing and misleading. It states: "Any combination equivalent to graduation from high school supplemented by 48 units of college-level coursework or passing a locally approved assessment of knowledge and skills in assisting students with the instructional program preferred" (Petition, p. 166). This wording raises several concerns. It does not specify what type of "locally approved assessment" would be sufficient, leaving the rigor and validity of such a measure unclear. More significantly, the Petition anticipates receiving federal Title I funding beginning in its second year of operation, at which point these paraprofessional qualifications are not optional—they are mandated under ESSA. By listing them as "preferred," the Petition does not appreciate a federal requirement and fails to demonstrate a comprehensive plan for ensuring that Instructional Aides will meet the legal standards necessary to provide instructional support.

#### **F. Element F: Health and Safety**

*The procedures that the school will follow to ensure the health and safety of pupils and staff, as required by Education Code section 47605(c)(5)(F), at a minimum:...  
(D) Provide for the screening of pupils' vision and hearing and the screening of pupils for scoliosis to the same extent as would be required if the pupils attended a non-charter public school. (5 CCR § 11967.5.1 (f)(6).)*

*The development of a school safety plan, and the annual review and update of the plan, pursuant to Section 47606.3. (EC § 47605(c)(5)(F)(ii).)*

The Petition references compliance with pupil vision screening requirements under Education Code § 49452 by stating that screenings will be conducted upon entry and every third year thereafter until grade 7. This description is not aligned with the statute, which requires vision screening for pupils upon enrollment and in grades K, 2, 5, and 8. Additionally, the Petition fails to state that it will deliver color vision testing for male students that reach the first grade as required by Education Code section 49455.

Finally, the Petition references compliance with pupil hearing screening requirements under Education Code § 49452, stating that screenings will be conducted by a credentialed school audiometrist. However, it does not specify the statutory grade-level requirements (K/1, 2, 5, and 8). As written, this section falls short of the requirement in Education Code § 47605(c)(5)(F) for a reasonably comprehensive description of health and safety procedures, and it should be revised to reflect the statutory testing and grade-level requirements and procedural details.

The Petition does not address scoliosis screening as required by Education Code § 49452.5. State law mandates scoliosis screening for female pupils in grade 7 and male pupils in grade 8. Specifically, the Petition should affirm that scoliosis screening will be conducted at the required grade levels and to outline procedures such as who will perform the screenings, how results will be documented, and how families will be notified of outcomes. As written, the Petition falls short of the requirement in Education Code § 47605(c)(5)(F) to provide a reasonably comprehensive description of health and safety procedures.

#### **G. Element J: Suspension/Expulsion Procedures**

*The procedures by which pupils can be suspended or expelled, as required by Education Code section 47605(c)(5)(J), at a minimum: (A) Identify a preliminary list, subject to later revision pursuant to subparagraph (E), of the offenses for which students in the charter school must (where non-discretionary) and may (where discretionary) be suspended and, separately, the offenses for which students in the charter school must (where non-discretionary) or may (where discretionary) be expelled, providing evidence that the petitioners' reviewed the offenses for which students must or may be suspended or expelled in non-charter public schools. (5 CCR § 11967.5.1 (f)(10)*

The Petition identifies offenses for which a student “may” be suspended or expelled but does not delineate offenses that are subject to mandatory expulsion. Additionally, the Petition does not provide any description of the circumstances under which a student could be subject to involuntary removal. While state law requires charter petitions to set out procedures addressing involuntary removal, the Petition does not identify what types of conduct, conditions, or issues might trigger such action apart from suspension or expulsion. As a result, the Petition lacks clarity regarding when involuntary removal, suspension or expulsion, would be applied, leaving students, families, and the authorizer

without a clear understanding of the school's standards or decision-making process in this area.

**2. The Charter School Presents an Unsound Educational Program for Students to Be Enrolled in the Charter School.**

The Petition proposes an educational program for students in grades TK-8 but does not articulate a comprehensive, legally compliant, viable program designed to meet the needs of its entire student population. The descriptions, and incorrect or missing standards, as a whole describe an unsound educational program.

**A. Concerns Regarding English Learner (EL) Program and English Language Development (ELD) Framework**

The Petition does not provide a coherent or comprehensive description of its English Learner (EL) program as required by California law and best practice. While the Petition acknowledges the presence of ELs and includes general statements about compliance, its description of identification, instruction, program design, evaluation, and reclassification is vague, internally inconsistent, and in some cases reflects a fundamental misunderstanding of California's English Language Development (ELD) Framework, the California ELD Standards, and the requirements of the California EL Roadmap. These deficiencies are serious, as they risk denying English Learners the services necessary to achieve both English proficiency and meaningful access to grade-level academic content.

**1. Identification & Parent Notification**

The Petition states it will identify English Learners through the Home Language Survey and Initial ELPAC within 30 days, and that parents will be notified of proficiency levels, program placement, and "instructional program options" (Petition, p. 88). However, it does not describe what those "options" are, creating ambiguity about whether the Charter School intends to offer multiple programs. California law requires that all ELs receive designated and integrated ELD; there is no opt-in program choice. Moreover, the Petition states parents will be informed of their right to decline services. While parents do retain that legal right, best practice does not include offering this option at initial notification, as doing so may discourage participation in critical services. Compounding this concern, the Petition provides no plan for how the Charter School will monitor and support students whose parents decline services, leaving a significant gap in ensuring language development for all English Learners.

**2. Program Placement & Instructional Model**

The Petition claims that the Charter School will design "individualized support and instruction for EL students based on their proficiency levels to support language

development in three distinct subjects" (Petition, pp. 88–89). This statement is vague and unrealistic. It does not explain what "individual instruction" entails, which subjects are included, or how such individualized services would be delivered systematically. Furthermore, it does not explain how instruction for EL students can be integrated into the PBL model. Instead of presenting a structured and thoroughly developed program that clearly aligns proficiency levels with instruction in both designated and integrated ELD settings, the petition substitutes vague assurances that do not amount to a comprehensive or actionable plan.

### **3. Designated ELD**

The Petition mischaracterizes Designated ELD by framing it as optional: "If students need protected time during the school day, they will receive it during WIN time (intervention)" (Petition, p. 89). This is a serious misunderstanding. California requires that all English Learners receive daily protected Designated ELD to develop language skills for students to have access to core content standards. Moreover, the Petition fails to reference the California ELD Standards in relation to designated instruction, nor does it describe how instruction will be grouped by proficiency levels, what curriculum will be used, or how content and language objectives will be integrated. The Petition collapses Designated ELD into general intervention, reflecting a fundamental lack of understanding of its distinct role in English Learners' language development.

### **4. Integrated ELD**

The Petition's description of Integrated ELD is similarly inadequate. It lists a series of "methodologies" such as TPR, scaffolds, and peer collaboration (Petition, pp. 89–90). These are strategies, not methodologies, and their inclusion does not demonstrate that the school understands Integrated ELD. Integrated ELD requires teachers in all content areas to use the California ELD Standards in tandem with academic content standards to ensure access to grade-level curriculum. The Petition never describes this alignment, does not provide examples of language objectives tied to content, and does not identify how teachers will be trained or held accountable for implementation. This misrepresentation suggests that the Petitioners do not understand the difference between Integrated and Designated ELD and risk reducing Integrated ELD to occasional scaffolding strategies rather than systemic instructional design.

### **5. Alignment to California ELD Standards, Framework, and Roadmap**

Although the Petition makes references to "alignment with the California ELD Standards" (Petition, pp. 56, 88), it does not explain how the standards will be used to structure instruction across the three proficiency levels (Emerging, Expanding, Bridging). It omits any discussion of the ELA/ELD Framework, which provides guidance

for integrating language and content, and makes no mention of the California EL Roadmap, which sets the state’s vision and guiding principles for EL success. Without explicit commitments to these foundational state resources, the Petition does not demonstrate that its program is grounded in California’s required frameworks and policies.

## **6. Program Assessment & Evaluation**

The Petition fails to provide a meaningful plan for evaluating its ELD program. It states that effectiveness will be determined using “school-based academic assessments” (Petition, pp. 90–91) rather than language development assessments. This indicates a misunderstanding of the purpose of ELD program evaluation, which must focus on measures of language acquisition such as ELPAC growth, progress across proficiency levels, and reclassification rates. The Petition also sets an arbitrary goal of proficiency within five years (Petition, p. 90) without describing expectations for annual growth, monitoring benchmarks, or specific instructional adjustments. References to promotion and graduation rates as ELD metrics (Petition, p. 90) are not only inappropriate for a TK–8 school but demonstrate further misalignment with the program’s purpose.

## **7. Reclassification & Monitoring of RFEP Students**

The Petition makes general reference to reclassification but does not describe the state’s four required criteria (ELPAC, teacher evaluation, parent consultation, and comparison of student performance with peers) or how they will be applied (Petition, p. 89). It also omits a plan for monitoring Reclassified Fluent English Proficient (RFEP) students for four years as required by law. Without these details, the Petition cannot ensure that students will be properly supported through the reclassification process or that former ELs will continue to succeed after exiting services.

## **8. Students with Distinct Needs (Newcomers, LTELs, Dually Identified)**

The Petition does not include targeted strategies for newcomers, Long-Term English Learners (LTELs), or students dually identified as EL and students with disabilities (Petition, pp. 88–91). While it describes special education services elsewhere, it does not explain how ELD instruction will be adapted for dually identified students, how IEP goals will integrate language development, or how newcomers will be supported with primary language resources and acculturation. These omissions are significant given the diverse needs of English Learners across these subgroups.

## **9. Transitional Kindergarten (TK)**

The Petition does not demonstrate an understanding of how the Charter School will serve English Learners in TK. Throughout the English Learner section, the Petition

states that all new students will take the Initial ELPAC within 30 days of enrollment (Petition, p. 88). However, TK students are not administered the Initial ELPAC until they enter kindergarten. TK students are administered the Home Language Survey upon enrollment, but there is no state English proficiency test administered in TK. The Petition provides no description of how the Charter School will identify and support potential English Learners in TK prior to official testing, such as through the Home Language Survey, teacher observations, or alternate local assessments. Nor does it describe how TK English Learners will receive designated and integrated ELD prior to kindergarten. This omission demonstrates a lack of understanding of state requirements and leaves a gap in services for TK students who require language development support.

Taken together, these deficiencies show that the Petition does not demonstrate a clear understanding of California's requirements for English Learners. The Petition conflates designated and integrated ELD, fails to guarantee protected time, omits alignment with the ELD Framework and EL Roadmap, proposes an inappropriate evaluation model, and does not address the needs of newcomers, LTELs, or dually identified students. Its approach to parent notification is problematic and potentially harmful, and its staffing and PD commitments are insufficient. These shortcomings are serious and indicate that the Petitioner's English Learner program is unsound. As written, the petition's ELD plan risks causing educational harm to one of the most vulnerable student groups.

#### **B. Concerns Regarding Serving the Needs of Students with Disabilities**

As discussed in Section 1(A)(5) of this report, the Petition fails to comprehensively describe implementation of its special education program. While the Charter School elects to be a school of the county office for special education, the Charter School appears to itself assume many of the special education services yet presents an undeveloped service model. This presents a special education program with the potential to cause educational harm to students with disabilities if they do not receive the necessary and appropriate services to support learning.

#### **C. Failure to Acknowledge Reading Screener**

The Petition fails to acknowledge an important change in California law that will be effective during the charter term. California law requires all local education agencies, which includes charter schools, to administer a state-approved reading screener for students in grades K–2 beginning no later than the 2025–26 school year. Only specific screeners approved by the California Department of Education may be used. The Petition makes no reference to this mandate and provides no evidence that the school is aware of or prepared to implement one of the approved instruments. The screening is supposed to be considered part of the school's "comprehensive instructional

strategy".<sup>6</sup> The absence of any plan to comply represents an incomplete and unsound education plan. Failing to acknowledge this requirement calls into question whether the assessment will be implemented. If not, it has the potential to cause harm to students because those with reading difficulties, such as dyslexia, will not be identified at the earliest stage of their education.

**3. Petitioner is Demonstrably Unlikely to Successfully Implement the Program Set Forth in the Petition.**

Petitioner and Propel, through the Petition submission and as supplemented by other correspondence and public hearings before MUSD and County Board, on a whole have not provided a comprehensive plan that is likely to be successfully implemented. Rather, the Petition and other representations by Petitioner and Propel lack critical detail and transparency, and other information provided in the Petition appears incomplete or nonviable. Each area of concern indicates the Petitioner is demonstrably unlikely to successfully implement the program set forth in the Petition.

**A. Lack of Transparency**

Petitioner and Propel appear to misrepresent their relationships with other charter-affiliated entities which were scrutinized in the past for related-party transactions, and other improper financial interest concerns. The lack of candor and transparency regarding questions of operations, control, and improper financial interests during the Petition review process demonstrates the type of relationship a CMO and charter school are likely to have with the chartering authority after petition approval, when the chartering authority is engaged in oversight responsibilities. This evasiveness and lack of transparency give reason to question Petitioner's intention to operate in good faith, leading to the Petitioner being demonstrably unlikely to successfully implement the program proposed.

Petitioner, in its July 28, 2025 response to MUSD's denial of Petition, declared:

- (1) Propel will not operate or control Charter School.
- (2) Charter School is not affiliated with the OFL and OFY network of charter schools.
- (3) Charter School and Propel are not affiliated with John and Joan Hall.

These statements appear to be intentionally misleading, narrowly focused but not addressing the big picture concerns. The lack of candor and transparency is troubling. Each declaration by Petitioner is addressed below.

**1. Operation or Control of Charter School by Propel**

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<sup>6</sup> Ed. Code § 53008.

Petitioner/Nonprofit stated Propel will not operate or control Charter School. Propel already appears to exert significant influence and control over the Nonprofit and Petition, however, despite Propel's multiple statements maintaining it is only a services provider. Despite the concerns raised, Nonprofit or Propel have not definitively identified who appointed the founding members of the Nonprofit Board, who prepared the Charter Petition, and why Propel is providing its services and startup costs gratis to Nonprofit. Additionally, representatives of Propel submitted the Petition to MUSD, and attended and provided representations on behalf of Propel at the MUSD and County Board public hearings. Although Propel seems to be the driving force behind the formation of the Charter School, they continually minimize their role as only providing operational and administrative services to the Charter School and an (inexperienced) Nonprofit Board. In reviewing Nonprofit's declaration, and after a comprehensive review of the record before MUSD and before the County Office, The Review Team determined:

- i. Propel likely established the Nonprofit. Though an attorney served as incorporator, the initial address in the Articles of Incorporation is the same address as Propel. (See Attachment A.) It appears likely Propel directed legal counsel to prepare and file the Articles of Incorporation with the California Secretary of State, and appoint the members of the Nonprofit Board. This would mean Propel handpicked the current board members, including the Nonprofit board president who submitted the letter to MUSD stating Propel will not operate or control Charter School. Legally that appears true, as the Nonprofit Board was incorporated for the specific purpose of creating, operating, and managing one or more public charter schools. Realistically, Propel does and will exert significant influence over the Charter School operations and Nonprofit, as demonstrated by their conduct already.
- ii. Propel submitted the Petition to MUSD, and appears to be the leading proponent for the Charter School. Propel representatives were the only representatives for the Charter School in attendance at the MUSD meetings, and Propel representatives were a significant presence for the Charter School in attendance at the Public Hearing.
- iii. As described above, the members of Nonprofit Board do not have experience in school administration and related areas, making it likely they will rely heavily on Propel for administration and operations - more consistent with what would be expected of a charter management organization, which already have the experience and qualifications to manage charter schools. The Nonprofit Board's lack of K-12 experience and Propel's actions taken to establish Nonprofit and the Charter School suggest Propel prepared or initiated preparation of the Petition, which provides the framework for the Charter School's operations and educational program. By influencing the framework of the Charter School by which it will operate, including identification of external consultants, Propel exerts significant influence on the Charter School.

- iv. Despite stating at the Public Hearing that Propel does not have a contract with Nonprofit (and stating the Charter School could not contract with Propel until it is established, which is misleading as the Nonprofit is a legal entity that could contract with Propel, and has contracted with other external consultants listed on pages 12 and 13 of Petition), and the Petition stating it “intends” to contract with Propel, Propel already identifies Bridges of Promise Academies on its website as one of its “Partners”, including other partners Reach Public Schools, The Learning Canvas, Opportunities for Learning (“OFL”), and Options for Youth (“OFY”). (See Attachment B.) Although Propel is a nonprofit public benefit corporation, that does not mean Propel is not driven to have revenue; it simply means the profits must be reinvested in the organization. Propel pays for its staff and expenses from revenue, and its revenue and assets are supporting establishment of the Charter School. It is unlikely Propel is providing its services without the expectation that it will at some point see a return on its investment through a contract for services. Indeed, it is not uncommon for a CMO such as Propel to create over time a series of charter schools that provide a steady source of revenue for the organization. For example, Education Management Systems, a for-profit charter management corporation formed by John and Joan Hall in 1998, established the OFL schools in 1999 and the early 2000s (that are now managed by Propel as CMO, following changes in law that required CMOs to be nonprofit corporations).
- v. Despite not yet having a contract with Nonprofit, Propel is funding startup costs and will provide Charter School a line of credit to assist with cash flow in the first year. Startup costs are likely significant, including attorney fees related to establishment of the Nonprofit, preparation of the Petition, advocacy expenses, administrative expenses, website development and maintenance, community and prospective parent outreach, legal compliance, policy and procedure development, and architect services referenced in page 214 of the Petition.
- vi. Propel describes itself as a back office services provider, but as described above, its actions suggest it more accurately serves in an unofficial charter management capacity. This is supported by information learned at the Public Hearing, that Propel will provide operational and administrative services to Charter School and contract with a different vendor to provide back office services. Propel will receive approximately 10% of the Charter School’s funding for its operational and administrative services (see discussion in subsection B., below, regarding administrative services), a significant flat fee more akin to a charter management organization’s fee than the typical hourly rate of a services provider.
- vii. Nonprofit has taken the position that as manager of Charter School, it is only subject to the Brown Act once the Petition is approved. The Review Team disagrees, and believes managing a charter school extends to the submission of a charter petition and the process a nonprofit undertakes to establish the

Charter School. Currently, Nonprofit's meetings do not conform to the Brown Act, and meetings are not publicly noticed, agendized, and open to the public. Without publicly available agendas, the Review Team is unable to confirm the status and subject of transactions between Nonprofit and Propel.

While Propel may not directly control the Charter School or Nonprofit, Propel appears to have established the mechanisms for control of the Charter School and Nonprofit, including selecting and appointing of the Nonprofit board members. Evidence strongly suggests Propel will be the entity in effect operating Charter School, given its role in the Petition and proposed operational and administrative services it intends to provide, even if, on paper, its operation of the Charter School is at direction of the Nonprofit Board. Propel's role far exceeds the traditional role of a vendor providing back office services such as accounting, payroll, and Human Resources. The Review Team is unaware of other back office service providers who establish charter management nonprofit corporations and related charter schools and provide the necessary startup costs.

Propel's lack of transparency leaves the Review Team to question the extent of Propel's involvement, and if and how Propel's services to Nonprofit and Charter School will differ from the services they provide to OFL and OFY charter schools they manage. The OFL and OFY charter schools each report Propel as its CMO on the charter school's IRS form 990s, Schedule O. (See Attachment C.) OFL and OFY charter schools have a similar corporate structure to Charter School. Each charter school is organized by an independent nonprofit corporation. The nonprofits board of directors "operates" the charter schools, and Propel serves as the nonprofit CMO. Given the lengths Propel has gone to distance itself from the CMO role here, the Review Team believes it likely that Propel established the Nonprofit, and advocates for creation of the Charter School, as an additional revenue source for Propel's services (and potentially the first of multiple charter schools), while skirting the legal definition of a nonprofit entity managing a charter school and related transparency

Propel appears to have arranged the Nonprofit and Charter School structure, and Propel's administrative and operative services to such, to avoid state law governing CMOs. A nonprofit entity that operates or manages a charter school is subject to the Brown Act, the California Public Records Act, the conflict of interest prohibitions of Government Code section 1090, and the Political Reform Act. Serving as CMO to Charter School would force Propel to hold public, agendized meetings pursuant to the Brown Act, and make its records public and subject to the Public Records Act. Serving as CMO would also subject Propel and its leadership to conflict of interest and financial interest prohibitions, and transparency regarding financial interests, that extend beyond what is required of non-CMO nonprofit corporations. By asserting Nonprofit as the managing entity, while providing the administrative and operational services as a vendor, Propel is shielding its operations from public scrutiny.

## **2. Charter School's Relationship to the OFL and OFY Network of Charter Schools.**

MUSD's denial of Petition raised concerns about Charter School's relationship to OFL and OFY charter schools, because of OFL and OFY's history of related-party transactions and being governed and operated by a large network of affiliated nonprofit and for-profit corporations established, owned, and/or operated by the John and Joan Hall family, as described in the findings raised by Los Angeles Unified School District in its April 17, 2017 staff report regarding the renewal of OFL and OFY charter petitions, and based in part upon an extraordinary audit conducted by the Fiscal Crisis & Management Assistance Team ("FCMAT"), and FCMAT reports dated August 9, 2006 and April 11, 2007. Nonprofit Board denies Charter School is affiliated with the OFL and OFY charter schools. In reviewing Nonprofit's declaration of non-affiliation, the Review Team determined the following, in addition to its review in subsection 1., above:

- i. Propel is the current Charter Management Organization providing "back office services" for ten OFL and OFY schools. Propel's partnership with these charter schools is stated on its website, and reflected in the OFL and OFY charter schools' respective Form 990s. (See Attachment C.) For example, the OFL-Baldwin Park 2021-2026 charter renewal petition identifies Propel as its CMO, responsible for day-to-day operations as its administrative manager. The OFY-Acton 2025-2030 charter renewal petition also identifies Propel as its CMO.
- ii. In 2019, Colleen Mullen, Propel's CEO, founded "Propel, a Charter Management Group, Inc." with her 19 colleagues. According to a podcast interview with Ms. Mullen, her 19 colleagues came from former charter management organizations that operated the OFL and OFY charter schools managed by Propel today. Per Ms. Mullen, "Propel emerged in response to a pivotal change in legislation affecting California's charter schools." (See Attachment D.)
- iii. At some point the management of OFL and OFY moved to Propel, perhaps due to the relationships of Propel's leadership with John and Joan Hall, the founders of OFY, OFL, and the charter management organizations that previously operated OFL and OFY. By the end of fiscal year 2023, after approximately four years in operation, Propel had net assets of \$9,163,469, earned from its contracts with OFL, OFY, and other school entities.
- iv. Propel is expected to provide operational and administrative services to Charter School, and Propel provides operational and administrative services to OFL and OFY entities in its role as CMO of those charter schools.
- v. Propel is funding the Charter School's startup costs, appears to have funded the Nonprofit's startup costs, and will provide the Charter School with a line of credit for first year expenses. Presumably, Propel is providing these funds through its existing revenue (though we do not have confirmation of the

source of these funds and whether they are provided from Propel's assets or an unknown-to-us third party). Regarding repayment of the line of credit, Charter School does not project performing debt service until the fiscal year 2028-29, and projects a moderate monthly payment of \$8,333 a month, in addition to the percentage of Charter School's funding.

Propel may have structured Nonprofit as a separate nonprofit corporation, and Charter School as a charter school operated by Nonprofit as CMO, but Charter School and Nonprofit are connected to, and possibly modeled after, OFY and OFL charter schools via Propel and its leadership team, a leadership team whose work managing OFY and OFL charter schools predates Propel.

### **3. Charter School and Propel; John and Joan Hall; OFY and OFL; and related entities.**

As discussed above, concerns raised by MUSD regarding connections between Charter School and John and Joan Hall are described in the MUSD findings of denials, and any affiliation between the Charter School and Propel is expressly denied by the Nonprofit. In independently reviewing the relationships between the parties, and in addition to the review conducted in Subsections 1 and 2 above, the Review Team determined:

- i. The 2006 and 2007 FCMAT reports identified above described the network of charter school, private school, and vendors providing supporting services operated and/or owned by the John and Joan Hall and their family members. (See Attachment E.) The John and Joan Hall family established, owned, and/or operated a vast network of nonprofit charter schools and for-profit schools, for-profit educational management organizations, and other entities providing services to charter schools and for-profit schools. The charter management organizations established by the Hall family operated the charter schools established by the Hall family, and contracted for services with entities established by the Hall family. The FCMAT reports raise concerns regarding transactions between these various entities, including improper related-party transactions, lack of written agreements, lack of adequate detail on invoices, and potentially excessive compensation of John and Joan Hall.
- ii. Pathways Management Group Inc., a charter management entity, incorporated in 2010 by the Hall family, managed charter schools established by the Hall family, including OFY and OFL charter schools. (See Attachment F.) John and Joan Hall, along with Lynette Sanders and Karen Norton, were the incorporators of Options for Youth California, Inc., in 1999.

- iii. Propel CEO and founder, Ms. Mullen, was also identified as a principal officer on Options for Youth California Inc.’s Form 990 for tax years 2021 and 2022, after she founded Propel in 2019. (See Attachment G.) Options for Youth California, Inc., was the management company providing corporate and administrative functions to the OFY charter schools at the time of the FCMAT audit.
- iv. In another OFY charter school’s Bylaws (OFY-Acton, effective June 3, 2018 through present), OFY California, Inc. was named as the Sole Statutory Member of OFY-Acton. (See Attachment H.) Propel is OFY-Acton’s CMO. From public facing documents, it appears Ms. Mullen both founded Propel in 2019 and serves as its CEO, and in some years thereafter continued to serve as an officer for OFY California, while it was the Sole Statutory Member for OFY-Acton, which compensated Propel for CMO services.
- v. AB 406 became effective July 1, 2019, the same year Propel was established by Ms. Mullen and her colleagues. AB 406 prohibited for-profit charter management organizations, such as Education Management Systems III. from operating charter schools. Following AB 406, a charter school may elect to operate as, or be operated by, a California nonprofit public benefit corporation. Operate as, or be operated by, includes managing the charter school’s day-to-day operations as its administrative manager, and providing services to a charter school before the governing body of the charter school has approved the contract for those services at a publicly noticed meeting.
- vi. SB 126 was approved in 2019, and expressly codified in California Education Code Section 47604.1, effective January 1, 2020, bringing charter schools under the purview of several key transparency laws, including the Brown Act, California Public Records Act, Government Code Section 1090 conflict of interest laws, and the Political Reform Act.
- vii. According to Propel’s CEO, Ms. Mullen, during an interview on The Charter School Insider Podcast, Episode #9, titled “Founding & Growing a CMO Aimed at Significance,” on November 28, 2023, Propel was developed in 2019 in response to legislative changes addressing transparency requirements, namely SB 126, which charter schools and CMOs were previously not required to adhere to. (See Attachment D.)
- viii. Despite the scrutiny of Propel’s relationship to John and Joan Hall, Propel has not been forthcoming about these relationships. Aspects of the Petition and these relationships remain obscure, despite their importance to determining whether Propel proposed a Petition that is likely to be successfully implemented. The lack of transparency raises more questions. Questions and concerns remain regarding:
  - a. The address listed on Propel’s Articles of Incorporation, filed February 2019, is 320 N. Halstead Street, Suite 230, Pasadena, California. (See Attachment I.) 320 N. Halstead Street is or was the same address as numerous Hall family entities providing services to charter schools.

Propel appears to have been another related entity within the corridor of Hall family charter school services.

- b. Nonprofit's stringent denial of these relationships in its response to the MUSD denial is puzzling, when it is clear relationships do exist among these entities and individuals, instead of being transparent and directly addressing these relationships.
- c. Nonprofit stringently denies connections between the Charter School, OFY, and OFL, but logically it appears either Propel is funding Nonprofit and Charter School with its revenues from OFY and OFL and other schools, or Propel has an undisclosed financial resource funding the Nonprofit and Charter School's creation and startup.
- d. It is unclear what unidentified service providers the Charter School will contract with for services, including curriculum, when the Hall family owns entities that provide a multitude of services to charter schools. For example, OFY-Acton charter school contracts with Propel as its CMO, and with the Hall family's for-profit company, 9 Dot Educational Solutions, LLC, for "back office services," and also contracts with Skyrocket, Inc., AllTech Enterprises, LLC, Education Dynamics, Inc., and Prep for Success, LLC, for other services. (See Attachment J); all of which are affiliated with the same address associated with the Hall family, at 320 N. Halstead St., Suite 230, in Pasadena. (See Fig. 2.)

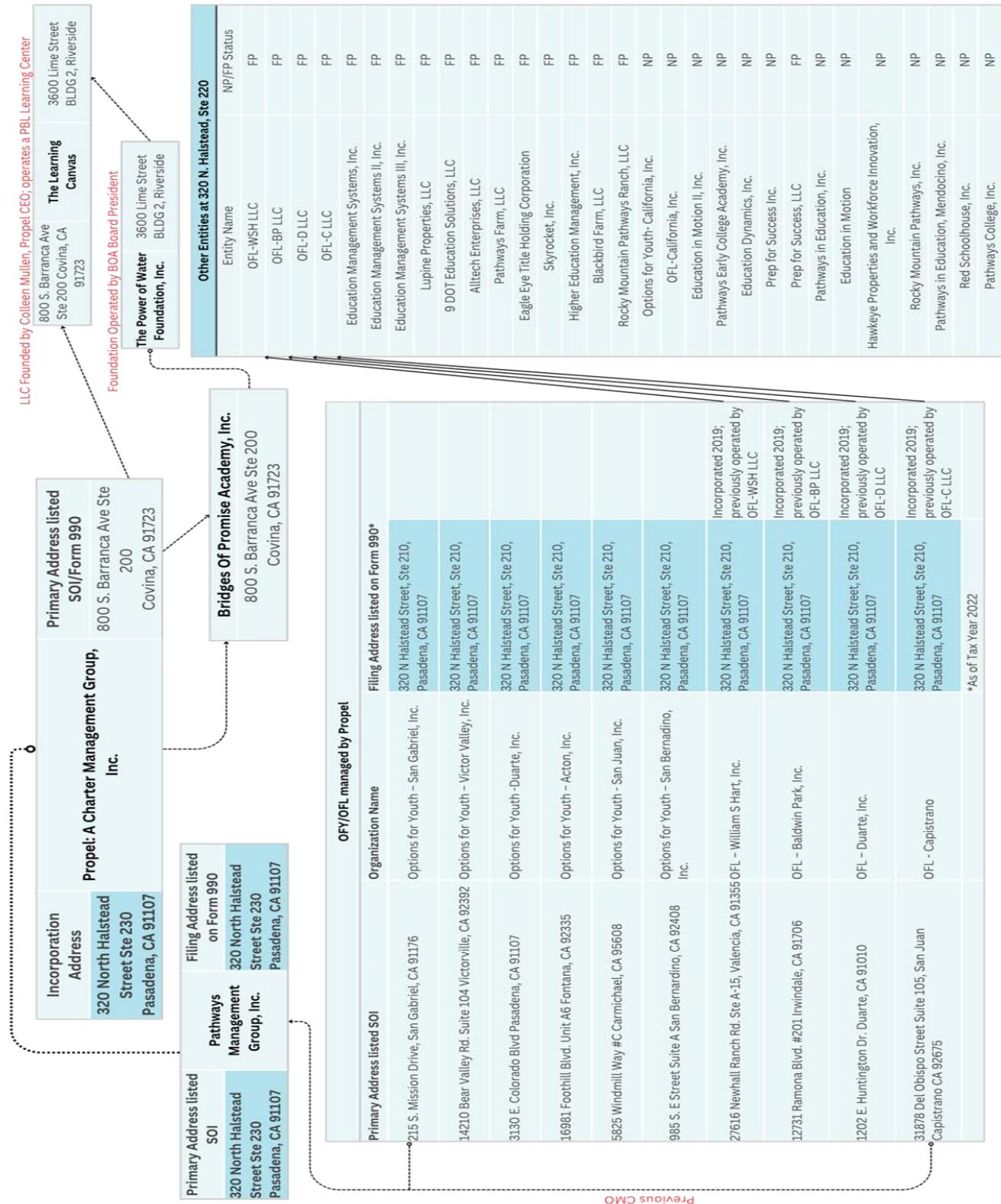


Figure 2

Concerns were raised regarding these entities and relationships because of past actions. Propel and Nonprofit obscured the issues rather than directly and transparently address them. The concerns raised by MUSD remain, upon RCOE's independent review of the same. The Review Team recognizes changes were implemented following recent changes in law. However, by structuring the Nonprofit as CMO, and Propel as a services provider of administrative and operational services, Propel shields itself and its financial relationships and transactions from transparency, public scrutiny, and oversight. Neither the public, nor a charter authorizer with oversight responsibilities, will have access to Propel's contracts, board meetings, or the financial interests of its leaders. RCOE and the public are and will be unable to determine whether there are financial interests and actual or perceived conflict of interest involved, and this limits RCOE's ability to provide effective oversight. Further, despite Propel serving as the CMO for other charter schools, its website does not readily reflect that it adheres to public transparency laws, such as the Brown Act.

#### **B. Petition Fails to Accurately Describe Structure for Providing Administrative Services.**

The Petition states it intends to contract with an "experienced back-office services provider" and intends to contract with Propel for "operational and administrative support services".<sup>7</sup> The Petition did not provide procedures for how it would select its service providers or set forth the criteria service providers must have to demonstrate they carry the necessary expertise.

According to the Petition the back-office provider will handle financial reporting and services. The Petition does not elaborate on the operational and administrative services Propel will provide, except that Propel supports operational and administrative tasks that are generally the responsibility of charter school leaders. Notwithstanding, Petitioner projects paying Propel \$835,882 for administrative services ("Propel's Fee") during the first year which represents approximately 13.5% of the first-year budget. During the public hearing, Propel stated its fee is 13.5% and a portion of Propel's Fee, 3.5% will go towards Delta Managed Solutions for back-office services. Propel retains the remaining 10% for administrative services not further elaborated upon in the Petition. However, without a contract or a statement in the Petition, the County Office cannot confirm the accuracy of Propel's fee. A review of the 10 other California charter schools for which Propel serves as the charter management organization shows on average a "management expense" of 18%.

Charter School	Form 990 FY 2024- Revenue	Management (Program expenses + management	Management and general expenses	Percentage of Budget	Type

<sup>7</sup> Petition, p. 213.

		and general expenses)			
OFY–San Gabriel Inc.	\$8,296,329	\$1,476,842	\$377,381	17.8%	IS
OFY–Victor Valley Inc.	\$16,508,759	\$2,937,651	\$688,186	17.8%	IS
OFY–Duarte Inc.	\$75,749,237	\$14,388,752	\$349,0988	18.9%	IS
OFY–Acton, Inc.	\$35,515,005*	\$6,250,905		17.6%	IS
OFY–San Bernardino Inc.	\$20,958,265*	\$3,907,316	\$916,817	18.6%	IS
OFL – William S Hart Inc.	\$21,957,768	\$3,956,433	\$106,0129	18.01%	IS
OFL – Baldwin Park, Inc.	\$7,590,483	\$1,350,915	\$342,410	17.8%	IS
OFL – Duarte, Inc.	\$5,163,597*	\$976,619		18.9%	IS
OFL–Capistrano	\$4,446,365	\$803,426	\$206,813	18.06%	IS

While “Management Expenses” may not accurately reflect the fee charged by Propel, it demonstrates that the other charter schools operated by Propel do so at a high cost. The Review Team has been unable to confirm the extent of services Propel provides to each charter school and whether the “back-office services” it will provide to Charter School align with the services it provides to OFL and OFY charter schools.

Notwithstanding Propel’s claim that they would charge Charter School 13.5% of revenues for back off services, in comparison, other comprehensive back-office providers contracted by RCBE-authorized charter schools either charge an annual flat fee (approximately \$52,000-\$265,000) or a percentage between 2.5-4.1% for services.

Finally, the Petition affirmatively states Propel is not an “entity managing a charter school” as the term is defined in Education Code section 47064.1, Education Code section 47604.1 states an “entity managing a charter school means” a nonprofit public benefit corporation that operates a charter school ***consistent with Section 47604.*** It is true that a nonprofit corporation is not an entity managing a charter school “solely because” it contracts to provide services when the governing board retains ultimate control. However, Propel’s involvement with preparing, submitting and lobbying approval of the Petition, demonstrates it is not solely a contracting party providing services. In fact, Petition states there is no contract with Propel. During the Public

Hearing, Propel reiterated they are not currently under contract with Charter School and stated it is providing its services at its own expense. Furthermore, Education Code section 47604 offers a definition, in the for profit context, when a charter school is “operate[d] as, or operated by” another entity. Specifically, charter schools are operated as or operated by a for profit entity when the entity, among other things, nominates, appoints or removes board members or officers of the school, manages a charter school’s day-to-day operations as its administrative manager, approves, denies or manages the budget or expenditures of the charter school that are not authorized by the governing body.

Here, although Propel is not a for profit entity, they arguably are engaged in conduct consistent with functionally “operating” Charter School as defined by Education Code section 47604. Propel’s statement that they are not an entity managing a charter school is highly misleading. We also note that unlike other CMOs, Propel is organized as a 501(c)(4) organization, not a 501(c)(3). Corporation law in California considers both 501(c)(3) and (c)(4) organizations as nonprofit corporations; there is not a legal corporate distinction and both forms of nonprofit corporations are allowed to operate charter schools. However, unlike 501(c)(3)s, Propel is allowed to engage in lobbying and political activities that promote social welfare<sup>8</sup>. Meaning, revenue Propel receives from Charter School could be used to contribute to political activities including supporting and opposing policies and candidates. Because 501(c)(4) organizations are not required to publicly disclose their donors, the extent to which private or political interests may be influencing Propel’s involvement with the Charter School remains unknown and cannot be independently verified.

A charter school may elect to operate as, or be operated by, a nonprofit public benefit corporation.
A charter school may not operate as, or be operated by, a for profit corporation or for profit charter management organization. To “operate as, or be operated by” in this context means services that include any of the following (Education Code section 47604(b)(2)):
Nominating, appointing, or removing board members or officers of the charter school.
Employing, supervising, or dismissing employees of the charter school, including certificated and noncertificated school personnel.
Managing the charter school’s day-to-day operations as its administrative manager.
Approving, denying, or managing the budget or any expenditures of the charter school that are not authorized by the governing body of the charter school.
Providing services to a charter school before the governing body of the charter school has approved the contract for those services at a publicly noticed meeting.

<sup>8</sup> Social Welfare Organizations, irs.gov; <https://www.irs.gov/charities-non-profits/other-non-profits/social-welfare-organizations>

As described here and throughout this report, there are many unanswered questions regarding Propel's role in establishment of the Nonprofit and Charter School, its future role and responsibilities, the reasonableness of its fees and the Charter School's ability to afford the fees, its influence over the Nonprofit, its actual experience with classroom based charter school management, and its intentional lack of transparency regarding its relationships and operations.

Further, staff are aware that Propel *does* serve as the CMO for other charter schools (for example, OFY-Acton, authorized by Acton-Aqua Dulce School District, where Propel is listed as the "CMO" in its February 2025 renewal petition). Education Code Section 47604.1 requires both charter schools and CMOs to comply with state laws related to transparency and conflict of interest, including compliance with the Ralph M. Brown Act's open meeting laws. If Propel is a CMO for *any* charter school, its website should presumably demonstrate compliance with the Brown Act—for example, agendas of publicly noticed meetings. However, upon a review of the Propel website, staff were unable to find any public meeting agendas posted under the Brown Act. If such agendas *are* posted within the Propel website, they are not "accessible through a prominent, direct link to the current agenda," as is required per Government Code section 54954.2(a)(2)(A).

The failure to accurately describe Propel's role and responsibilities, the characterization of its services as a back office services provider, its fees, and the lack of supporting documentation – indeed, the many unanswered questions regarding Propel, and the general uncertainty that creates about the Charter School and its operations - make it demonstrably unlikely Petitioner will successfully implement the program.

**C. Petition Proposes an Unrealistic Financial Plan; Financial Plan does not Demonstrate Adequate Financial Resources or Seriousness of Financial Undertaking Required to Open a New Charter School Program.**

The Petition's support documents do not include reasonable estimates of start-up costs, cash flow, or expenditures necessary to operate the school. Petitioner's start-up costs which Petitioner describes as "one-time startup/implementation expenses"<sup>9</sup> is limited to textbooks, student and staff technology equipment, educational and support services and Livescan costs. All other recurring costs are included in the Year 1 budget. According to the Year 1 budget, Charter School's state and federal revenue based on an enrollment of 435 students, assuming 90% ADA, will allow the Charter School to achieve a charter school budget with a positive balance.

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<sup>9</sup> Petition, Exhibit 11, page 8.

As described above, Propel's fee is 13.5% of the budget, a significant ongoing expense.

Conspicuously absent from the Year 1 budget are expenditures for facilities or furniture, although Charter School will be classroom based and Petitioner anticipates building a state-of-the-art educational facility that includes administrative offices, TK and K-6 classrooms and learning spaces, library and media center, multi-purpose room and outdoor and recreation spaces.<sup>10</sup> On page 215 of the Petition, there are links to two proposed facility locations. Both locations are undeveloped vacant parcels on land. Petitioner states they are currently in contract negotiations and conducting due diligence on the primary site, but did not clarify whether Petitioner is negotiating a lease or sale of the property. Petitioner's budget assumes the landlord is providing rent abatement in the first year, and Year 2-5 Budget includes a \$2.5 million lease expense which indicates Petitioner will be engaging in a lease-type relationship. It is unclear the accuracy of the projected \$2.5 million annual expense so early in the development process, without a proposed project and supporting documentation, and unclear how these expenses will be managed if enrollment and attendance apportionment falls significantly short of the Petition's estimates.

The Petition identifies other external consultants in addition to Propel, but only allocates \$22,500 for professional/consulting services for Year 1 and \$10,000 for Year 2. Given the lack of supporting documentation and detail regarding use of other external consultants, it is unclear if these amounts are realistic.

The Petition states Petitioner is working with Ruhnau Clarke Architects to design the facility. It is unclear if the design fees are included within the external consultant fees. It is unclear whether another party is funding the design of the facility, or whether the budget woefully underestimates these costs.

Petitioner inaccurately estimates costs for recruiting and retaining a competitive workforce. Although Petitioner has declared that their salaries are comparable, their base salary combined with their benefits package undermine such a claim. For example, an average principal with MUSD receives a comprehensive salary of \$201,856 which is a base salary of \$161,000, retirement contribution of \$30,751 and health/welfare contribution of \$10,105. In comparison, the Petition reflects a significantly smaller salary package of \$135,563, which is a base salary of \$125,000, a retirement contribution (401K or similar) of \$3,125, and a health/welfare contribution of \$7,438. Similar concerns exist for the lack of competitiveness in recruiting qualified teachers. Petitioner's failure to provide competitive salary and benefits packages indicates they are unlikely to recruit and retain qualified teachers and staff necessary to implement the educational program, or they inaccurately estimate employee costs; whereas actual costs will be significantly greater than proposed in Petition, impacting their fiscal projections.

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<sup>10</sup> Petition, page 213-14.

The significant ongoing costs of Propel and facilities expenses, with the exclusion or underestimation of other costs, and uncertainty regarding enrollment and apportionment, make it demonstrably unlikely the Petitioner will successfully implement the program.

**D. Lack of Experience Operating Proposed Educational Program.**

The Petition does not demonstrate that Petitioner has sufficient prior experience operating a classroom-based Charter School program. According to Petitioner's response to County Board Member Dennis during the Public Hearing, Petitioner has never operated a charter school. As discussed above, members of Petitioner's Board do not have experience in school administration, school curriculum and instruction, school accounting and finance, school business management, school facilities development, or, critically, implementation of a new charter school and all of its components. Indeed, if Petitioner's Board had experience in these areas, they would likely have understood and addressed the significant deficiencies in the Petition, including provisions that fail to comply with law, prior to submitting the Petition to MUSD. The unsound educational program presented, and the multitude of insufficient descriptions in the Petition, evidence this lack of experience.

As discussed above, Petitioner appears to rely heavily on the administrative and operational expertise of Propel, despite describing Propel as a back office services provider rather than a CMO. Even if Petitioner is relying on Propel, Propel manages ten existing charter schools in California, all of which are nonclassroom-based. Charter School will be classroom-based. The operation of classroom-based charter schools is significantly different from nonclassroom-based charter schools, with significantly different funding mechanisms, attendance accounting requirements, student needs, teacher and other staffing needs, student and teacher interactions, and facilities requirements.

If Petitioner lacks expertise, it is likely Petitioner does not have the capacity to critically evaluate Propel's recommendations, or the recommendations of other consultants. This makes the Charter School vulnerable to poor financial decisions or mismanagement. If the relationship with Propel were to end, Petitioner and Charter School would be left without in-house capacity to manage finances. Financial decisions without internal expertise may also prioritize compliance and technical accuracy but miss strategic alignment with student needs.

The lack of experience of Petitioner, Petitioner's Board, and Propel in operating a classroom based California charter school, the vulnerability created by that lack of experience, and the evidence of this lack of experience in Petition, make it demonstrably unlikely Petitioner will successfully implement the program presented in the Petition.

## **E. Lack of Realistic Facilities Plan**

Petitioner's plan to provide facilities for its classroom-based program is underdeveloped, despite the importance to a classroom-based charter school of having a facility, and a facility it can afford. As described above, Petitioner's plan is to develop, or work with a partner to develop, a state-of-the-art facility on land that is currently vacant. Without a realistic plan for facilities, it is demonstrably unlikely Petitioner will be able to successfully implement the program.

Development of a state-of-the-art facility for its campus is the only plan identified in the Petition. Typically a startup charter school will locate in an existing facility. As enrollment increases, the charter school's budget stabilizes, and its reserves grow, some charter schools choose to develop or work with a real estate developer, typically an investor, to develop its own campus.

Here, Charter School is planning its campus before the Charter School has been established, and before it has state funding and actual enrollment. This is especially concerning given the lack of community and parent support expressed at the Public Hearing. Planning a state-of-the-art facility while it has no enrollment appears to be putting the cart before the horse.

Only the new state-of-the-art facility is proposed, with two possible vacant parcels. Many issues could arise that would prevent the facility from being finished for the 2027-2028 school year, when the Charter School intends to open. There could be significant cost increases, issues with the suitability of the property, or land use approval delays, issues obtaining financing or increased financing costs, or other obstacles. No backup plan for an existing facility is proposed.

Even assuming the facility will be built in time for the Charter School's opening, Petition provides insufficient detail to suggest the plan is feasible. Petitioner states they are "working with" Building Hope Real Estate (BHRE) regarding charter school facility development, but it is unclear what that entails. According to BHRE's website, they finance and construct school facilities and provide charter school administrative support services. According to BHRE's 990 form for calendar year 2023, BHRE had approximately \$6.89 million in revenue that year, \$10.29 million in expenses, total assets of at the end of the year of \$145.59 million, and \$133.07 million in total liabilities (with \$12.52 million in net assets). BHRE's liabilities included \$79.9 million in mortgages and other notes payable by the end of that year.

Petitioner has not provided a contract or proposed contract between BHRE and Nonprofit that provides information regarding this financial relationship and its costs. There are no details regarding who will own the land and improvements (presumably BHRE), the financing structure for the facility's construction, proposed length of lease

and actual proposed annual costs, the ability to terminate the lease, schedule for escalating cost increases, responsible party for providing furnishing and maintenance and an estimate of those costs, and how Petitioner will manage expenses if enrollment – and associated apportionment funding – falls short of its projections. There is no description of the feasibility of completing construction of the facilities for the 2027-2028 school year, or discussion of possible delays and the impact on the development timeline.

**F. Lack of Demonstrated Support or Community Need for Proposed Charter School.**

Petitioner is demonstrably unlikely to successfully implement the program due to a lack of community support and need.

Apart from the required percentage of meaningfully interested teachers, the Petition did not clearly identify any evidence of specific support or community need for the proposed Charter School. The Petition identifies its targeted geographic area, cites associated demographics, and makes general reference to socioeconomic challenges. Those demographics alone do not support a demonstrated need for the Charter School. The Petition lacks specific analysis that might demonstrate an academic or socioemotional need for the Charter School's program, for example, regarding existing test scores of MUSD students, or other specific student data. The Petition similarly lacks details identifying how its proposed program presents a solution to an identified community need. MUSD stated at the Public Hearing that the proposed program is duplicative of an existing MUSD PBL program, and a new PBL program opening in 2026-27.

No parents provided in-person support during the MUSD and RCBE Public Hearings. Some public comments were provided at the Public Hearing by Propel representatives in support of the Charter School, but all the individuals expressing support were seemingly speaking on behalf of anonymous parents that did not attend the public meeting. Petitioner stated it did not have a wait list, though it has statements of meaningful interest. Petitioner asserted at the Public Hearing that they have statements and videos from children and parents demonstrating meaningful interest in the Charter School, but those statements and videos were not provided by Petitioners.

Lack of demonstrated support and interest from the community questions Charter School's ability to achieve their aspirational enrollment goals, and their ability to be financially sustainable, particularly given the ambitious planned state-of-the-art facilities development.

## **SUMMARY OF FINDINGS FOR CONSIDERATION**

In summary, the concerns outlined in this staff report are the following:

1. The Petition does not contain a reasonably comprehensive description of each of the required elements.
  - a. Lack of Reasonably Comprehensive Description of Educational Program.
    1. Charter School Appears not to Serve a Specific Target Population
    2. Inadequate Framing of Student Needs
    3. Petitioner's Instructional Approach Does Not Enable Mastery of Content Standards
    4. Petition does not Adequately Respond to Pupil Needs Achieving Below Expected Levels
    5. Petition Fails to Demonstrate How it Will Meet the Needs of English Learners, Students with Disabilities and Academically Low Achieving
    6. Petition Does not Describe a Comprehensive Plan to Achieve Annual Goals within the Eight State Priorities for all Grade Levels
  - b. Measurable Pupil Outcomes Lack Specificity
  - c. Petition Lacks Detail Explaining How Pupil Progress will be Measured
  - d. Governance Structure does not Reflect a Seriousness that Charter School Will Become a Viable Enterprise
  - e. Desired Employee Qualifications are Likely Unable to Support the Educational Program
  - f. Petition Omits Comprehensive Description of Required Screenings
  - g. Student Suspension and Expulsion Plan is Not Reasonably Comprehensive or Fully Aligned with Legal Requirements
2. The Charter School Presents an Unsound Educational Program for Students to Be Enrolled in the Charter School.
  - a. Concerns Regarding English Learner (EL) Program and English Language Development (ELD) Framework
  - b. Concerns Regarding Serving the Needs of Students with Disabilities
  - c. Failure to Acknowledge Reader Screener
3. Petitioner is Demonstrably Unlikely to Successfully Implement the Program Set Forth in the Petition.
  - a. Lack of Transparency
  - b. Petition Fails to Accurately Describe Structure for Providing Administrative Services

- c. Petition Proposes an Unrealistic Financial Plan; Financial Plan does not Demonstrate Adequate Financial Resources or Seriousness of Financial Undertaking Required to Open a New Charter School Program
- d. Lack of Experience Operating Classroom Based Program
- e. Lack of Realistic Facilities Plan
- f. Lack of Demonstrated Support or Community Need for Proposed Charter School

#### **PROPOSED OPTIONS FOR BOARD ACTION**

It is recommended that the Board take action to either grant or deny the proposed Petition. The Board has the following options:

- 1. Grant the Petition, based on the findings required by Education Code Section 47605, for a 5-year term, commencing July 1, 2026, and concluding June 30, 2031, provided that the Memorandum of Understanding between the Charter School and RCOE be amended and/or the Petition revised to address the findings and any recommendations identified in the Staff Report prior to the date of commencement of the new term.
- 2. DENY the Petition and adopt, as findings of fact, the Proposed Findings identified in the Staff Report, concluding the Petition did not meet the requirements of Education Code Section 47605.

The Staff's recommendation is for the Board to deny the Petition and adopt the Findings identified in the Staff Report.

**END OF PART II.**

## APPENDIX

### ATTACHMENT A

A.1	2024 BRIDGES OF PROMISE ACADEMIES ARTICLES OF INCOPORATION .....	58
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## ATTACHMENT A

B2753-6332 06/26/2024 3:57 PM Received by California Secretary of State

**E**

**P**

### ARTICLES OF INCORPORATION OF

**BRIDGES OF PROMISE ACADEMIES, INC.**

For Office Use Only

**-FILED-**

File No.: 6286947

Date Filed: 6/26/2024

#### I.

The name of the corporation (the "Corporation") is: Bridges of Promise Academies, Inc.

#### II.

A. The Corporation is a nonprofit public benefit corporation and is not organized for the private gain of any person. It is organized under the California Nonprofit Public Benefit Corporation Law for charitable purposes.

B. The specific purpose of the Corporation is to create, operate and manage one or more primary or secondary public charter schools in the State of California. In connection with and in furtherance of the Corporation's educational and charitable purposes, the Corporation may perform and undertake any and all other lawful acts or activities, and exercise all such powers, rights and privileges applicable to California nonprofit public benefit corporations.

C. The Corporation is organized and shall be operated exclusively for the purposes set forth above in this Article II in furtherance of educational and charitable purposes within the meaning of Sections 170(c)(2)(B) and 501(c)(3) of the Internal Revenue Code of 1986, as now in effect or as may hereafter be amended (the "Code") and charitable purposes within the meaning of Section 214(a)(6) of the California Revenue and Taxation Code, as now in effect or as may hereafter be amended (the "R&TC").

D. In furtherance of its purposes, the Corporation shall have all the general powers enumerated in Sections 5140 and 5141 of the California Nonprofit Public Benefit Corporation Law, as now in effect or as may hereafter be amended, together with the power to solicit grants and contributions for such purposes.

#### III.

The name of the Corporation's initial agent for service of process is:

**Cogency Global, Inc.**

#### IV.

The initial street address and mailing address of the Corporation is:

**800 S. Barranca Avenue, Suite 200, Covina, California 91723**

#### V.

The Corporation shall have no members.

**VI.**

A. No substantial part of the activities of the Corporation shall consist of carrying on propaganda, or otherwise attempting to influence legislation (except as otherwise permitted by Section 501(h) of the Code if the Corporation has an election thereunder in effect, and any corresponding laws of the State of California), and the Corporation shall not participate in or intervene in any political campaign (including the publishing or distribution of statements) on behalf of, or in opposition to, any candidate for public office.

B. Notwithstanding any other provision of these Articles of Incorporation, the Corporation shall not directly or indirectly carry on any activity which would prevent it from obtaining exemption from Federal income taxation as a corporation described in Section 501(c)(3) of the Code, or cause it to lose such exempt status, or carry on any activity not permitted to be carried on by a corporation, contributions to which are deductible under Section 170(c)(2), 2055 and 2522 of the Code or which is exempt from taxation under Section 214 of the R&TC.

C. In accordance with Section 508(e) of the Code and Section 5260 of the California Corporations Code, if in any taxable year the Corporation is a private foundation as defined under Section 509(a) of the Code, then in such year: (a) the Corporation shall distribute such amounts for each taxable year on undistributed income under Section 4942 of the Code; (b) the Corporation shall not engage in any acts of self-dealing which is subject to tax under Section 4941(d) of the Code; (c) the Corporation shall not retain any excess business holdings which are subject to tax under Section 4943(c) of the Code; (d) the Corporation shall not make any investments in such manner so as to subject the Corporation to tax under Section 4944 of the Code; and (e) the Corporation shall not make any taxable expenditures which are subject to tax under Section 4945 of the Code.

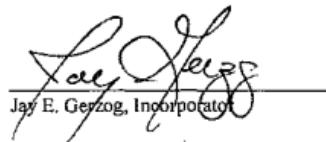
**VII.**

The property of the Corporation is irrevocably dedicated to educational and charitable purposes meeting the requirements for exemption provided under Sections 170(c)(2)(B) and 501(c)(3) of the Code and Section 214 of the R&TC, and no part of the net income or assets of the Corporation shall ever inure to the benefit of, or be distributable to, any director or officer thereof or any other private person, except that the Corporation shall be authorized and empowered to pay reasonable compensation for services rendered and to make payments and distributions in furtherance of the purposes set forth herein. Upon the dissolution or winding up of the Corporation, its assets remaining after payment, or provision for payment, or all debts and liabilities of the Corporation shall be distributed to a nonprofit fund, foundation, or corporation which is organized and operated exclusively for educational and/or charitable purposes meeting the requirements for exemption under Section 501(c)(3) of the Code and Section 214 of the R&TC and which is exempt from federal income tax pursuant to Section 501(c)(3) of the Code.

**VIII.**

The Corporation is authorized to indemnify its agents (as defined in Section 5238 of the California Nonprofit Public Benefit Corporation Law) to the fullest extent permissible under California law.

Dated: June 20, 2024

  
Jay E. Gerzog, Incorporator

## ATTACHMENT B

 **PROPEL**

Home About Services Contact

*Why Choose Us*

**We Deliver Comprehensive and Tailored Solutions**

One of Propel's greatest strengths lies in our partnerships. We are proud to serve exceptional charter school partners, collaborating with them and their educational service providers to deliver comprehensive, tailored solutions.

*Our Partners Include*

"Propel's commitment to our mission transcends routine oversight; they are a cornerstone in our day-to-day operations and a reliable source of guidance and expertise."

Brock C., Principal

"Propel's guidance has established a standard of support that prioritizes student welfare and fosters a culture of collaboration."

Online Programs, Team

"In every interaction, Propel has shown a deep understanding of charter school challenges, offering proactive solutions that showcase a commitment to excellence."

Yelena S., Principal



## ATTACHMENT C

efile GRAPHIC print - DO NOT PROCESS	As Filed Data -	DLN: 93493122011064
<b>SCHEDULE O</b> (Form 990)		OMB No. 1545-0047
<b>Supplemental Information to Form 990 or 990-EZ</b> Complete to provide information for responses to specific questions on Form 990 or 990-EZ or to provide any additional information. ▶ Attach to Form 990 or 990-EZ. ▶ Go to <a href="http://www.irs.gov/Form990">www.irs.gov/Form990</a> for the latest information.		<b>2022</b> <b>Open to Public Inspection</b>
Name of the organization OFL-DUARTE INC		Employer identification number 83-3664599

### 990 Schedule O, Supplemental Information

Return Reference	Explanation
FORM 990, PART VI, SECTION A, LINE 3	PROPEL, INC. - A CHARTER MANAGEMENT ORGANIZATION

### 990 Schedule O, Supplemental Information

Return Reference	Explanation
FORM 990, PART VI, SECTION A, LINE 8B	THE ORGANIZATION DOES NOT HAVE A COMMITTEE WITH AUTHORITY TO ACT ON BEHALF OF THE GOVERNING BODY.

### 990 Schedule O, Supplemental Information

Return Reference	Explanation
FORM 990, PART VI, SECTION B, LINE 11B	THE FORM 990 IS PREPARED BY THE ORGANIZATION'S OUTSIDE PUBLIC ACCOUNTING FIRM BASED ON INFORMATION PROVIDED BY MANAGEMENT. ONCE A DRAFT OF THE RETURN IS AVAILABLE, IT IS REVIEWED BY MANAGEMENT WITH ANY CHANGES OR REVISIONS INCORPORATED INTO THE FILING. THE REVISED RETURN IS THEN SUBMITTED TO THE BOARD OF DIRECTORS FOR THEIR REVIEW AND APPROVAL PRIOR TO SUBMITTING TO THE IRS.

### 990 Schedule O, Supplemental Information

Return Reference	Explanation
FORM 990, PART VI, SECTION B, LINE 12C	MONITORING IS PERFORMED REGULARLY BY THE OFFICERS TO IDENTIFY POTENTIAL CONFLICTS OF INTEREST. ANY QUESTION OF A CONFLICT IS ADDRESSED WITH THE INTERESTED PERSON, WHO IS REQUIRED TO DISCLOSE THE EXISTENCE OF ANY FINANCIAL INTEREST AND BE AFFORDED THE OPPORTUNITY TO DISCLOSE ALL MATERIAL FACTS TO THE BOARD AND EXECUTIVE DIRECTOR. IF A CONFLICT OF INTEREST IS IDENTIFIED, THE APPROPRIATE ACTION IS TAKEN, INCLUDING LIMITATIONS TO THE INDIVIDUAL'S INFLUENCE ON RELATED BUSINESS MATTERS.

### 990 Schedule O, Supplemental Information

Return Reference	Explanation
FORM 990, PART VI, SECTION B, LINE 15	THE EXECUTIVE DIRECTOR'S PAY IS DETERMINED BASED ON DATA PROVIDED BY EXTERNAL CHARTER MANAGEMENT ORGANIZATIONS AND THROUGH COMPARISON STUDIES OF OTHER CHARTER SCHOOLS. THE BOARD MUST VOTE TO APPROVE THE EXECUTIVE DIRECTOR'S COMPENSATION AS A DIRECT ACTION. THE OFFICERS AND KEY EMPLOYEES' PAY IS DETERMINED BASED ON DATA PROVIDED BY EXTERNAL CHARTER MANAGEMENT ORGANIZATIONS AND THROUGH COMPARISON STUDIES OF OTHER CHARTER SCHOOLS. THE BOARD MUST VOTE TO APPROVE THE OFFICERS AND KEY EMPLOYEES' COMPENSATION AS A DIRECT ACTION.

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**SCHEDULE O**  
(Form 990)

Department of the Treasury  
Internal Revenue Service

**Supplemental Information to Form 990 or 990-EZ**

Complete to provide information for responses to specific questions on  
Form 990 or 990-EZ or to provide any additional information.  
Attach to Form 990 or 990-EZ.  
Go to [www.irs.gov/Form990](http://www.irs.gov/Form990) for the latest information.

OMB No. 1545-0047  
**2023**  
Open to Public  
Inspection

Name of the organization  
OFL-CAPISTRANO INC

Employer identification number  
83-3695152

Return Reference	Explanation
FORM 990, PART VI, SECTION A, LINE 3	THE ORGANIZATION RECEIVES MANAGEMENT SERVICES FROM ITS CMO, PROPEL, A CHARTER MANAGEMENT GROUP, INC. WHICH INCLUDE BUSINESS MANAGEMENT, OPERATIONAL LEADERSHIP, QUALITY ASSURANCE, AND TRAINING.
FORM 990, PART VI, SECTION A, LINE 7A	THE AUTHORIZING DISTRICT HAS THE RIGHT TO APPOINT A DISTRICT REPRESENTATIVE TO THE BOARD; HOWEVER, THIS RIGHT HAS NOT BEEN EXERCISED.
FORM 990, PART VI, SECTION A, LINE 8B	THE ORGANIZATION DOES NOT HAVE A COMMITTEE TO WITH AUTHORITY TO ACT ON BEHALF OF THE GOVERNING BODY.
FORM 990, PART VI, SECTION B, LINE 11B	THE FORM 990 IS PREPARED BY THE ORGANIZATION'S OUTSIDE PUBLIC ACCOUNTING FIRM BASED ON INFORMATION PROVIDED BY MANAGEMENT. ONCE A DRAFT OF THE RETURN IS AVAILABLE, IT IS REVIEWED BY MANAGEMENT WITH ANY CHANGES OR REVISIONS INCORPORATED INTO THE FILING. THE REVISED RETURN IS THEN SUBMITTED TO THE BOARD OF DIRECTORS FOR THEIR REVIEW AND APPROVAL PRIOR TO SUBMITTING TO THE IRS.
FORM 990, PART VI, SECTION B, LINE 12C	MONITORING IS PERFORMED REGULARLY BY THE OFFICERS TO IDENTIFY POTENTIAL CONFLICTS OF INTEREST. ANY QUESTION OF A CONFLICT IS ADDRESSED WITH THE INTERESTED PERSON, WHO IS REQUIRED TO DISCLOSE THE EXISTENCE OF ANY FINANCIAL INTEREST AND BE AFFORDED THE OPPORTUNITY TO DISCLOSE ALL MATERIAL FACTS TO THE BOARD AND EXECUTIVE DIRECTOR. IF A CONFLICT OF INTEREST IS IDENTIFIED, THE APPROPRIATE ACTION IS TAKEN, INCLUDING LIMITATIONS TO THE INDIVIDUAL'S INFLUENCE ON RELATED BUSINESS MATTERS.
FORM 990, PART VI, SECTION C, LINE 19	SINCE THE CORPORATION IS A PUBLIC AGENCY, ALL GOVERNING DOCUMENTS, BOARD POLICIES, MEETING MINUTES, AGENDAS, MEETING PACKAGES OF BACKUP MATERIALS, ETC, ARE PUBLIC RECORDS AND AN ELECTRONIC COPY OF EACH IS KEPT AS WELL AS PAPER COPIES AT THE SCHOOL SITE. THERE IS A PUBLIC RECORDS POLICY (POLICY AVAILABLE UPON REQUEST) REGARDING HOW TO AND FROM WHOM TO MAKE A REQUEST OF THESE DOCUMENTS.
FORM 990, PART XII, LINE 2C:	THE PROCESS FOR OVERSIGHT AND SELECTION OF AN INDEPENDENT ACCOUNTANT HAS NOT CHANGED FROM THE PRIOR YEAR.

For Paperwork Reduction Act Notice, see the Instructions for Form 990 or 990-EZ.

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Schedule O (Form 990) 2023

**Additional Data**

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efile Public Visual Render		ObjectId: 202511219349301916 - Submission: 2025-05-01	TIN: 83-3735809
<b>SCHEDULE O</b> (Form 990)		<b>Supplemental Information to Form 990 or 990-EZ</b> Complete to provide information for responses to specific questions on Form 990 or 990-EZ or to provide any additional information. Attach to Form 990 or 990-EZ. Go to <a href="http://www.irs.gov/Form990">www.irs.gov/Form990</a> for the latest information.	OMB No. 1545-0047 <b>2023</b> Open to Public Inspection
Department of the Treasury Internal Revenue Service Name of the organization OFL-BALDWIN PARK INC		Employer identification number 83-3735809	
Return Reference	Explanation		
FORM 990, PART VI, SECTION A, LINE 3	THE ORGANIZATION RECEIVES MANAGEMENT SERVICES FROM ITS CMO, PROPEL, A CHARTER MANAGEMENT GROUP, INC. WHICH INCLUDE BUSINESS MANAGEMENT, OPERATIONAL LEADERSHIP, QUALITY ASSURANCE, AND TRAINING.		
FORM 990, PART VI, SECTION A, LINE 8B	THE ORGANIZATION DOES NOT HAVE A COMMITTEE WITH AUTHORITY TO ACT ON BEHALF OF THE GOVERNING BODY.		
FORM 990, PART VI, SECTION B, LINE 11B	THE FORM 990 IS PREPARED BY THE ORGANIZATION'S OUTSIDE PUBLIC ACCOUNTING FIRM BASED ON INFORMATION PROVIDED BY MANAGEMENT. ONCE A DRAFT OF THE RETURN IS AVAILABLE, IT IS REVIEWED BY MANAGEMENT WITH ANY CHANGES OR REVISIONS INCORPORATED INTO THE FILING. THE REVISED RETURN IS THEN SUBMITTED TO THE BOARD OF DIRECTORS FOR THEIR REVIEW AND APPROVAL PRIOR TO SUBMITTING TO THE IRS.		
FORM 990, PART VI, SECTION B, LINE 12C	MONITORING IS PERFORMED REGULARLY BY THE OFFICERS TO IDENTIFY POTENTIAL CONFLICTS OF INTEREST. ANY QUESTION OF A CONFLICT IS ADDRESSED WITH THE INTERESTED PERSON, WHO IS REQUIRED TO DISCLOSE THE EXISTENCE OF ANY FINANCIAL INTEREST AND BE AFFORDED THE OPPORTUNITY TO DISCLOSE ALL MATERIAL FACTS TO THE BOARD AND EXECUTIVE DIRECTOR. IF A CONFLICT OF INTEREST IS IDENTIFIED, THE APPROPRIATE ACTION IS TAKEN, INCLUDING LIMITATIONS TO THE INDIVIDUAL'S INFLUENCE ON RELATED BUSINESS MATTERS.		
FORM 990, PART VI, SECTION C, LINE 19	THE ORGANIZATION'S GOVERNING DOCUMENTS, CONFLICT OF INTEREST POLICY, AND RECENT FEDERAL INCOME TAX RETURNS ARE MADE AVAILABLE FOR PUBLIC INSPECTION AT THE ORGANIZATION'S PRINCIPAL OFFICE DURING NORMAL BUSINESS HOURS.		
FORM 990, PART IX, LINE 11G	CONSULTING: PROGRAM SERVICE EXPENSES 408,948. MANAGEMENT AND GENERAL EXPENSES 138,847. FUNDRAISING EXPENSES 0. TOTAL EXPENSES 547,795. DISTRICT ADMIN FEES: PROGRAM SERVICE EXPENSES 49,011. MANAGEMENT AND GENERAL EXPENSES 16,641. FUNDRAISING EXPENSES 0. TOTAL EXPENSES 65,652. OTHER FEES: PROGRAM SERVICE EXPENSES 124,975. MANAGEMENT AND GENERAL EXPENSES 42,432. FUNDRAISING EXPENSES 0. TOTAL EXPENSES 167,407.		
FORM 990, PART XII, LINE 2C:	THE PROCESS FOR OVERSIGHT AND SELECTION OF AN INDEPENDENT ACCOUNTANT HAS NOT CHANGED FROM THE PRIOR YEAR.		

For Paperwork Reduction Act Notice, see the Instructions for Form 990 or 990-EZ.

Cat. No. 51056K

Schedule O (Form 990) 2023

#### Additional Data

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Software ID:  
Software Version:

efile Public Visual Render		ObjectId: 202501139349301950 - Submission: 2025-04-23	TIN: 83-3736184
<b>SCHEDULE O</b> (Form 990)		<b>Supplemental Information to Form 990 or 990-EZ</b> Complete to provide information for responses to specific questions on Form 990 or 990-EZ or to provide any additional information. Attach to Form 990 or 990-EZ. Go to <a href="http://www.irs.gov/Form990">www.irs.gov/Form990</a> for the latest information.	OMB No. 1545-0047 <b>2023</b> Open to Public Inspection
Name of the organization OFL-WILLIAM S HART INC		Employer identification number 83-3736184	
Return Reference	Explanation		
FORM 990, PART VI, SECTION A, LINE 3	THE ORGANIZATION RECEIVES MANAGEMENT SERVICES FROM ITS CMO, PROPEL, A CHARTER MANAGEMENT GROUP, INC. WHICH INCLUDE BUSINESS MANAGEMENT, OPERATIONAL LEADERSHIP, QUALITY ASSURANCE, AND TRAINING.		
FORM 990, PART VI, SECTION A, LINE 8B	THERE ARE NO COMMITTEES THAT CAN ACT ON BEHALF OF THE BOARD.		
FORM 990, PART VI, SECTION B, LINE 11B	THE FORM 990 IS PREPARED BY THE ORGANIZATION'S OUTSIDE PUBLIC ACCOUNTING FIRM BASED ON INFORMATION PROVIDED BY MANAGEMENT. ONCE A DRAFT OF THE RETURN IS AVAILABLE, IT IS REVIEWED BY MANAGEMENT WITH ANY CHANGES OR REVISIONS INCORPORATED INTO THE FILING. THE REVISED RETURN IS THEN SUBMITTED TO THE BOARD OF DIRECTORS FOR THEIR REVIEW AND APPROVAL PRIOR TO SUBMITTING TO THE IRS.		
FORM 990, PART VI, SECTION B, LINE 12C	MONITORING IS PERFORMED REGULARLY BY THE OFFICERS TO IDENTIFY POTENTIAL CONFLICTS OF INTEREST. ANY QUESTION OF A CONFLICT IS ADDRESSED WITH THE INTERESTED PERSON, WHO IS REQUIRED TO DISCLOSE THE EXISTENCE OF ANY FINANCIAL INTEREST AND BE AFFORDED THE OPPORTUNITY TO DISCLOSE ALL MATERIAL FACTS TO THE BOARD AND EXECUTIVE DIRECTOR. IF A CONFLICT OF INTEREST IS IDENTIFIED, THE APPROPRIATE ACTION IS TAKEN, INCLUDING LIMITATIONS TO THE INDIVIDUAL'S INFLUENCE ON RELATED BUSINESS MATTERS.		
FORM 990, PART VI, SECTION B, LINE 15	THE EXECUTIVE DIRECTOR'S PAY IS DETERMINED BASED ON DATA PROVIDED BY EXTERNAL CHARTER MANAGEMENT ORGANIZATIONS AND THROUGH COMPARISON STUDIES OF OTHER CHARTER SCHOOLS. THE BOARD MUST VOTE TO APPROVE THE EXECUTIVE DIRECTOR'S COMPENSATION AS A DIRECT ACTION. THE OFFICERS AND KEY EMPLOYEES' PAY IS DETERMINE BASED ON DATA PROVIDED BY EXTERNAL CHARTER MANAGEMENT ORGANIZATIONS AND THROUGH COMPARISON STUDIES OF OTHER CHARTER SCHOOLS. THE BOARD MUST VOTE TO APPROVE THE OFFICERS AND KEY EMPLOYEES' COMPENSATION AS A DIRECT ACTION. THE PROCESS DESCRIBED HERE WAS LAST COMPLETED IN 2023.		
FORM 990, PART VI, SECTION C, LINE 19	THE ORGANIZATION'S GOVERNING DOCUMENTS, CONFLICT OF INTEREST POLICY, AND RECENT FEDERAL INCOME TAX RETURNS ARE MADE AVAILBALE FOR PUBLIC INSPECTION AT THE ORGANIZATION'S PRINCIPAL OFFICE DURING NORMAL BUSINESS HOURS.		
FORM 990, PART IX, LINE 11G	EDUCATIONAL SERVICES - ADD ON: PROGRAM SERVICE EXPENSES 86,180. MANAGEMENT AND GENERAL EXPENSES 31,544. FUNDRAISING EXPENSES 0. TOTAL EXPENSES 117,724. CONSULTING: PROGRAM SERVICE EXPENSES 1,250,461. MANAGEMENT AND GENERAL EXPENSES 457,704. FUNDRAISING EXPENSES 0. TOTAL EXPENSES 1,708,165. DISTRICT ADMIN FEES: PROGRAM SERVICE EXPENSES 148,888. MANAGEMENT AND GENERAL EXPENSES 54,497. FUNDRAISING EXPENSES 0. TOTAL EXPENSES 203,385. STUDENT SERVICES: PROGRAM SERVICE EXPENSES 40,767. MANAGEMENT AND GENERAL EXPENSES 14,922. FUNDRAISING EXPENSES 0. TOTAL EXPENSES 55,689.		
FORM 990, PART XII, LINE 2C:	THE PROCESS FOR OVERSIGHT AND SELECTION OF AN INDEPENDENT ACCOUNTANT HAS NOT CHANGED FROM THE PRIOR YEAR.		

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Cat. No. 51056K

Schedule O (Form 990) 2023

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DLN: 93493128039544

OMB No. 1545-0047

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(Form 990)**Supplemental Information to Form 990 or 990-EZ**Complete to provide information for responses to specific questions on  
Form 990 or 990-EZ or to provide any additional information.► Attach to Form 990 or 990-EZ.  
► Go to [www.irs.gov/Form990](http://www.irs.gov/Form990) for the latest information.**2022**Open to Public  
InspectionDepartment of the Treasury  
Internal Revenue ServiceName of the organization  
OPTIONS FOR YOUTH - ACTON INCEmployer identification number  
82-2272612**990 Schedule O, Supplemental Information**

Return Reference	Explanation
FORM 990, PART VI, SECTION A, LINE 3	THE ORGANIZATION RECEIVES MANAGEMENT SERVICES FROM ITS CMO, PROPEL, A CHARTER MANAGEMENT GROUP, INC. WHICH INCLUDE BUSINESS MANAGEMENT, OPERATIONAL LEADERSHIP, QUALITY ASSURANCE, AND TRAINING.

**990 Schedule O, Supplemental Information**

Return Reference	Explanation
FORM 990, PART VI, SECTION A, LINE 8B	THERE ARE NO COMMITTEES THAT ACT ON BEHALF OF THE BOARD.

**990 Schedule O, Supplemental Information**

Return Reference	Explanation
FORM 990, PART VI, SECTION B, LINE 11B	THE FORM 990 IS PREPARED BY THE SCHOOL'S OUTSIDE PUBLIC ACCOUNTING FIRM BASED ON INFORMATION PROVIDED BY MANAGEMENT. ONCE A DRAFT OF THE RETURN IS AVAILABLE, IT IS REVIEWED BY MANAGEMENT WITH ANY CHANGES OR REVISIONS INCORPORATED INTO THE FILING. THE REVISED RETURN IS THEN SUBMITTED TO THE BOARD OF DIRECTORS FOR THEIR REVIEW AND APPROVAL PRIOR TO SUBMITTING TO THE IRS.

**990 Schedule O, Supplemental Information**

Return Reference	Explanation
FORM 990, PART VI, SECTION B, LINE 12C	THE ORGANIZATION DISTRIBUTES A WRITTEN CONFLICT OF INTEREST POLICY AND CODE OF ETHICS THAT APPLIES TO ALL EMPLOYEES. DIRECTORS ARE PROHIBITED FROM OWNING ANY INTEREST IN ANY ENTITY WITH WHICH THE ORGANIZATION ENGAGES IN ANY BUSINESS OR CONTRACTUAL RELATIONSHIP OF ANY KIND, AND ARE REQUIRED TO DISCLOSE ANY CONFLICTS OF INTEREST TO THE BOARD. ADDITIONALLY, THE ORGANIZATION PERIODICALLY SOLICITS BIDS FOR CONTRACTS FROM A POOL OF VENDORS AND AS A RESULT PERFORMS DUE DILIGENCE AS TO THE SAME VENDOR MULTIPLE TIMES. THIS FREQUENT CONTACT ALLOWS FOR MORE CONTINUOUS MONITORING OF POTENTIAL CONFLICTS. CONTRACTS WITH ANY VENDOR RELATED TO A DIRECTOR OR OFFICER ARE CONSIDERED RELATED PARTY TRANSACTIONS AND ARE REVIEWED BY THE BOARD WITH A HIGH LEVEL OF SCRUTINY. CONFLICTS ARE REQUIRED TO BE DISCLOSED TO THE BOARD PRIOR TO THE DISCUSSION OF THE PROPOSED CONTRACT, AND THE RELATED PARTY IS PROHIBITED FROM ANY DISCUSSION OR VOTING IN CONNECTION WITH THE CONTRACT. THE BOARD DETERMINES WHETHER THE CONTRACT PROVIDES THE GOODS OR SERVICES THAT ARE MOST NEEDED BY THE ORGANIZATION AND WHETHER THE BEST PRICE FOR SUCH GOODS OR SERVICES IS BEING OBTAINED IN COMPARISON WITH THE PROPOSED CONTRACT. IF THERE IS A QUESTION AS TO WHETHER A CONFLICT EXISTS, THE BOARD HOLDS A VOTE TO DETERMINE WHETHER A CONFLICT IS DEEMED TO EXIST, WITH ANY INTERESTED DIRECTOR OR OFFICER EXCLUDED FROM THE PROCEEDINGS.

Software ID:  
Software Version:

efile Public Visual Render	ObjectId: 202521209349302157 - Submission: 2025-04-30	TIN: 95-4204496
SCHEDULE O (Form 990)	<b>Supplemental Information to Form 990 or 990-EZ</b> Complete to provide information for responses to specific questions on Form 990 or 990-EZ or to provide any additional information. Attach to Form 990 or 990-EZ. Go to <a href="http://www.irs.gov/Form990">www.irs.gov/Form990</a> for the latest information.	OMB No. 1545-0047 <b>2023</b> Open to Public Inspection
Department of the Treasury Internal Revenue Service	Name of the organization OPTIONS FOR YOUTH - VICTOR VALLEY INC	Employer identification number 95-4204496

Return Reference	Explanation
FORM 990, PART VI, SECTION A, LINE 3	THE ORGANIZATION RECEIVES MANAGEMENT SERVICES FROM ITS CMO, PROPEL, A CHARTER MANAGEMENT GROUP, INC. WHICH INCLUDE BUSINESS MANAGEMENT, OPERATIONAL LEADERSHIP, QUALITY ASSURANCE, AND TRAINING.
FORM 990, PART VI, SECTION A, LINE 8B	THERE ARE NO COMMITTEES THAT CAN ACT ON BEHALF OF THE BOARD.
FORM 990, PART VI, SECTION B, LINE 11B	THE FORM 990 IS PREPARED BY THE SCHOOL'S OUTSIDE PUBLIC ACCOUNTING FIRM BASED ON INFORMATION PROVIDED BY MANAGEMENT. ONCE A DRAFT OF THE RETURN IS AVAILABLE, IT IS REVIEWED BY MANAGEMENT WITH ANY CHANGES OR REVISIONS INCORPORATED INTO THE FILING. THE REVISED RETURN IS THEN SUBMITTED TO THE BOARD OF DIRECTORS FOR THEIR REVIEW AND APPROVAL PRIOR TO SUBMITTING TO THE IRS.
FORM 990, PART VI, SECTION B, LINE 12C	MONITORING IS PERFORMED REGULARLY BY THE OFFICERS TO IDENTIFY POTENTIAL CONFLICTS OF INTEREST. ANY QUESTION OF A CONFLICT IS ADDRESSED WITH THE INTERESTED PERSON, WHO IS REQUIRED TO DISCLOSE THE EXISTENCE OF ANY FINANCIAL INTEREST AND BE AFFORDED THE OPPORTUNITY TO DISCLOSE ALL MATERIAL FACTS TO THE BOARD AND EXECUTIVE DIRECTOR. IF A CONFLICT OF INTEREST IS IDENTIFIED, THE APPROPRIATE ACTION IS TAKEN, INCLUDING LIMITATIONS TO THE INDIVIDUAL'S INFLUENCE ON RELATED BUSINESS MATTERS.
FORM 990, PART VI, SECTION B, LINE 15	THE EXECUTIVE DIRECTOR'S PAY IS DETERMINED BASED ON DATA PROVIDED BY EXTERNAL CHARTER MANAGEMENT ORGANIZATIONS AND THROUGH COMPARISON STUDIES OF OTHER CHARTER SCHOOLS. THE BOARD MUST VOTE TO APPROVE THE EXECUTIVE DIRECTOR'S COMPENSATION AS A DIRECT ACTION. THE OFFICERS AND KEY EMPLOYEES' PAY IS DETERMINED BASED ON DATA PROVIDED BY EXTERNAL CHARTER MANAGEMENT ORGANIZATIONS AND THROUGH COMPARISON STUDIES OF OTHER CHARTER SCHOOLS. THE BOARD MUST VOTE TO APPROVE THE OFFICERS AND KEY EMPLOYEES' COMPENSATION AS A DIRECT ACTION.
FORM 990, PART VI, SECTION C, LINE 19	THE ORGANIZATION'S GOVERNING DOCUMENTS, CONFLICT OF INTEREST POLICY, AND RECENT FEDERAL INCOME TAX RETURNS ARE MADE AVAILABLE FOR PUBLIC INSPECTION AT THE ORGANIZATION'S PRINCIPAL OFFICE DURING NORMAL BUSINESS HOURS.
FORM 990, PART XII, LINE 2C:	THE PROCESS FOR OVERSIGHT AND SELECTION OF AN INDEPENDENT ACCOUNTANT HAS NOT CHANGED FROM THE PRIOR YEAR.

For Paperwork Reduction Act Notice, see the Instructions for Form 990 or 990-EZ.

Cat. No. 51056K

Schedule O (Form 990) 2023

## Additional Data

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Software ID:  
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efile Public Visual Render		ObjectId: 202511209349302156 - Submission: 2025-04-30	TIN: 26-0564837
SCHEDULE O (Form 990)		<b>Supplemental Information to Form 990 or 990-EZ</b> Complete to provide information for responses to specific questions on Form 990 or 990-EZ or to provide any additional information. Attach to Form 990 or 990-EZ. Go to <a href="http://www.irs.gov/Form990">www.irs.gov/Form990</a> for the latest information.	OMB No. 1545-0047  <b>2023</b> Open to Public Inspection
Name of the organization OPTIONS FOR YOUTH - SAN JUAN INC		Employer identification number 26-0564837	
Return Reference	Explanation		
FORM 990, PART VI, SECTION A, LINE 3	THE ORGANIZATION RECEIVES MANAGEMENT SERVICES FROM ITS CMO, PROPEL, A CHARTER MANAGEMENT GROUP, INC. WHICH INCLUDE BUSINESS MANAGEMENT, OPERATIONAL LEADERSHIP, QUALITY ASSURANCE, AND TRAINING.		
FORM 990, PART VI, SECTION A, LINE 8B	THERE ARE NO COMMITTEES THAT ACT ON BEHALF OF THE BOARD.		
FORM 990, PART VI, SECTION B, LINE 11B	THE FORM 990 IS PREPARED BY THE SCHOOL'S OUTSIDE PUBLIC ACCOUNTING FIRM BASED ON INFORMATION PROVIDED BY MANAGEMENT. ONCE A DRAFT OF THE RETURN IS AVAILABLE, IT IS REVIEWED BY MANAGEMENT WITH ANY CHANGES OR REVISIONS INCORPORATED INTO THE FILING. THE REVISED RETURN IS THEN SUBMITTED TO THE BOARD OF DIRECTORS FOR THEIR REVIEW AND APPROVAL PRIOR TO SUBMITTING TO THE IRS.		
FORM 990, PART VI, SECTION B, LINE 12C	THE ORGANIZATION DISTRIBUTES A WRITTEN CONFLICT OF INTEREST POLICY AND CODE OF ETHICS THAT APPLIES TO ALL EMPLOYEES. DIRECTORS ARE PROHIBITED FROM OWNING ANY INTEREST IN ANY ENTITY WITH WHICH THE ORGANIZATION ENGAGES IN ANY BUSINESS OR CONTRACTUAL RELATIONSHIP OF ANY KIND, AND ARE REQUIRED TO DISCLOSE ANY CONFLICTS OF INTEREST TO THE BOARD. ADDITIONALLY, THE ORGANIZATION PERIODICALLY SOLICITS BIDS FOR CONTRACTS FROM A POOL OF VENDORS AND AS A RESULT PERFORMS DUE DILIGENCE AS TO THE SAME VENDOR MULTIPLE TIMES. THIS FREQUENT CONTACT ALLOWS FOR MORE CONTINUOUS MONITORING OF POTENTIAL CONFLICTS. CONTRACTS WITH ANY VENDOR RELATED TO A DIRECTOR OR OFFICER ARE CONSIDERED RELATED PARTY TRANSACTIONS AND ARE REVIEWED BY THE BOARD WITH A HIGH LEVEL OF SCRUTINY. CONFLICTS ARE REQUIRED TO BE DISCLOSED TO THE BOARD PRIOR TO THE DISCUSSION OF THE PROPOSED CONTRACT, AND THE RELATED PARTY IS PROHIBITED FROM ANY DISCUSSION OR VOTING IN CONNECTION WITH THE CONTRACT. THE BOARD DETERMINES WHETHER THE CONTRACT PROVIDES THE GOODS OR SERVICES THAT ARE MOST NEEDED BY THE ORGANIZATION AND WHETHER THE BEST PRICE FOR SUCH GOODS OR SERVICES IS BEING OBTAINED IN COMPARISON WITH THE PROPOSED CONTRACT. IF THERE IS A QUESTION AS TO WHETHER A CONFLICT EXISTS, THE BOARD HOLDS A VOTE TO DETERMINE WHETHER A CONFLICT IS DEEMED TO EXIST, WITH ANY INTERESTED DIRECTOR OR OFFICER EXCLUDED FROM THE PROCEEDINGS.		
FORM 990, PART VI, SECTION C, LINE 19	THE ORGANIZATION'S GOVERNING DOCUMENTS, CONFLICT OF INTEREST POLICY, AND RECENT FEDERAL INCOME TAX RETURNS ARE MADE AVAILABLE FOR PUBLIC INSPECTION AT THE ORGANIZATION'S PRINCIPAL OFFICE DURING NORMAL BUSINESS HOURS.		
FORM 990, PART IX, LINE 11G	CONSULTING: PROGRAM SERVICE EXPENSES 942,571. MANAGEMENT AND GENERAL EXPENSES 298,576. FUNDRAISING EXPENSES 0. TOTAL EXPENSES 1,241,147. ADDITIONAL SERVICES: PROGRAM SERVICE EXPENSES 5,450. MANAGEMENT AND GENERAL EXPENSES 1,728. FUNDRAISING EXPENSES 0. TOTAL EXPENSES 7,176. EDUCATIONAL SERVICES - ADD ON: PROGRAM SERVICE EXPENSES 314,701. MANAGEMENT AND GENERAL EXPENSES 99,687. FUNDRAISING EXPENSES 0. TOTAL EXPENSES 414,388. DISTRICT ADMIN FEES: PROGRAM SERVICE EXPENSES 61,810. MANAGEMENT AND GENERAL EXPENSES 19,580. FUNDRAISING EXPENSES 0. TOTAL EXPENSES 81,390.		
FORM 990, PART XII, LINE 2C:	THE PROCESS FOR OVERSIGHT AND SELECTION OF AN INDEPENDENT ACCOUNTANT HAS NOT CHANGED FROM THE PRIOR YEAR.		

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Cat. No. 51056K

Schedule O (Form 990) 2023

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(Form 990)**Supplemental Information to Form 990 or 990-EZ**

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► Attach to Form 990 or 990-EZ.  
► Go to [www.irs.gov/Form990](http://www.irs.gov/Form990) for the latest information.**2022****Open to Public  
Inspection**Department of the Treasury  
Internal Revenue ServiceName of the organization  
OPTIONS FOR YOUTH - SAN BERNARDINO INC

Employer identification number

27-1001410

**990 Schedule O, Supplemental Information**

Return Reference	Explanation
FORM 990, PART VI, SECTION A, LINE 3	PROPEL INC., A CHARTER MANAGEMENT ORGANIZATION

**990 Schedule O, Supplemental Information**

Return Reference	Explanation
FORM 990, PART VI, SECTION A, LINE 8B	THERE ARE NO COMMITTEES THAT ACT ON BEHALF OF THE BOARD.

**990 Schedule O, Supplemental Information**

Return Reference	Explanation
FORM 990, PART VI, SECTION B, LINE 11B	THE FORM 990 IS PREPARED BY THE SCHOOL'S OUTSIDE PUBLIC ACCOUNTING FIRM BASED ON INFORMATION PROVIDED BY MANAGEMENT. ONCE A DRAFT OF THE RETURN IS AVAILABLE, IT IS REVIEWED BY MANAGEMENT WITH ANY CHANGES OR REVISIONS INCORPORATED INTO THE FILING. THE REVISED RETURN IS THEN SUBMITTED TO THE BOARD OF DIRECTORS FOR THEIR REVIEW AND APPROVAL PRIOR TO SUBMITTING TO THE IRS.

**990 Schedule O, Supplemental Information**

Return Reference	Explanation
FORM 990, PART VI, SECTION B, LINE 12C	THE ORGANIZATION DISTRIBUTES A WRITTEN CONFLICT OF INTEREST POLICY AND CODE OF ETHICS THAT APPLIES TO ALL EMPLOYEES. DIRECTORS ARE PROHIBITED FROM OWNING ANY INTEREST IN ANY ENTITY WITH WHICH THE ORGANIZATION ENGAGES IN ANY BUSINESS OR CONTRACTUAL RELATIONSHIP OF ANY KIND, AND ARE REQUIRED TO DISCLOSE ANY CONFLICTS OF INTEREST TO THE BOARD. ADDITIONALLY, THE ORGANIZATION PERIODICALLY SOLICITS BIDS FOR CONTRACTS FROM A POOL OF VENDORS AND AS A RESULT PERFORMS DUE DILIGENCE AS TO THE SAME VENDOR MULTIPLE TIMES. THIS FREQUENT CONTACT ALLOWS FOR MORE CONTINUOUS MONITORING OF POTENTIAL CONFLICTS. CONTRACTS WITH ANY VENDOR RELATED TO A DIRECTOR OR OFFICER ARE CONSIDERED RELATED PARTY TRANSACTIONS AND ARE REVIEWED BY THE BOARD WITH A HIGH LEVEL OF SCRUTINY. CONFLICTS ARE REQUIRED TO BE DISCLOSED TO THE BOARD PRIOR TO THE DISCUSSION OF THE PROPOSED CONTRACT, AND THE RELATED PARTY IS PROHIBITED FROM ANY DISCUSSION OR VOTING IN CONNECTION WITH THE CONTRACT. THE BOARD DETERMINES WHETHER THE CONTRACT PROVIDES THE GOODS OR SERVICES THAT ARE MOST NEEDED BY THE ORGANIZATION AND WHETHER THE BEST PRICE FOR SUCH GOODS OR SERVICES IS BEING OBTAINED IN COMPARISON WITH THE PROPOSED CONTRACT. IF THERE IS A QUESTION AS TO WHETHER A CONFLICT EXISTS, THE BOARD HOLDS A VOTE TO DETERMINE WHETHER A CONFLICT IS DEEMED TO EXIST, WITH ANY INTERESTED DIRECTOR OR OFFICER EXCLUDED FROM THE PROCEEDINGS.

<a href="#">efile Public Visual Render</a>   ObjectID: 202511199349302866 - Submission: 2025-04-29		TIN: 81-1307231
<b>SCHEDULE O</b> (Form 990)		OMB No. 1545-0047
<b>Supplemental Information to Form 990 or 990-EZ</b> Complete to provide information for responses to specific questions on Form 990 or 990-EZ or to provide any additional information. Attach to Form 990 or 990-EZ. Go to <a href="http://www.irs.gov/Form990">www.irs.gov/Form990</a> for the latest information.		
Name of the organization OPTIONS FOR YOUTH - DUARTE INC		Employer identification number 81-1307231
Return Reference	Explanation	
FORM 990, PART VI, SECTION A, LINE 3	THE ORGANIZATION RECEIVES MANAGEMENT SERVICES FROM ITS CMO, PROPEL, A CHARTER MANAGEMENT GROUP, INC. WHICH INCLUDE BUSINESS MANAGEMENT, OPERATIONAL LEADERSHIP, QUALITY ASSURANCE, AND TRAINING.	
FORM 990, PART VI, SECTION A, LINE 8B	THERE ARE NO COMMITTEES THAT ACT ON BEHALF OF THE BOARD.	
FORM 990, PART VI, SECTION B, LINE 11B	THE FORM 990 IS PREPARED BY THE SCHOOL'S OUTSIDE PUBLIC ACCOUNTING FIRM BASED ON INFORMATION PROVIDED BY MANAGEMENT. ONCE A DRAFT OF THE RETURN IS AVAILABLE, IT IS REVIEWED BY MANAGEMENT WITH ANY CHANGES OR REVISIONS INCORPORATED INTO THE FILING. THE REVISED RETURN IS THEN SUBMITTED TO THE BOARD OF DIRECTORS FOR THEIR REVIEW AND APPROVAL PRIOR TO SUBMITTING TO THE IRS.	
FORM 990, PART VI, SECTION B, LINE 12C	THE ORGANIZATION DISTRIBUTES A WRITTEN CONFLICT OF INTEREST POLICY AND CODE OF ETHICS THAT APPLIES TO ALL EMPLOYEES. DIRECTORS ARE PROHIBITED FROM OWNING ANY INTEREST IN ANY ENTITY WITH WHICH THE ORGANIZATION ENGAGES IN ANY BUSINESS OR CONTRACTUAL RELATIONSHIP OF ANY KIND, AND ARE REQUIRED TO DISCLOSE ANY CONFLICTS OF INTEREST TO THE BOARD. ADDITIONALLY, THE ORGANIZATION PERIODICALLY SOLICITS BIDS FOR CONTRACTS FROM A POOL OF VENDORS AND AS A RESULT PERFORMS DUE DILIGENCE AS TO THE SAME VENDOR MULTIPLE TIMES. THIS FREQUENT CONTACT ALLOWS FOR MORE CONTINUOUS MONITORING OF POTENTIAL CONFLICTS. CONTRACTS WITH ANY VENDOR RELATED TO A DIRECTOR OR OFFICER ARE CONSIDERED RELATED PARTY TRANSACTIONS AND ARE REVIEWED BY THE BOARD WITH A HIGH LEVEL OF SCRUTINY. CONFLICTS ARE REQUIRED TO BE DISCLOSED TO THE BOARD PRIOR TO THE DISCUSSION OF THE PROPOSED CONTRACT, AND THE RELATED PARTY IS PROHIBITED FROM ANY DISCUSSION OR VOTING IN CONNECTION WITH THE CONTRACT. THE BOARD DETERMINES WHETHER THE CONTRACT PROVIDES THE GOODS OR SERVICES THAT ARE MOST NEEDED BY THE ORGANIZATION AND WHETHER THE BEST PRICE FOR SUCH GOODS OR SERVICES IS BEING OBTAINED IN COMPARISON WITH THE PROPOSED CONTRACT. IF THERE IS A QUESTION AS TO WHETHER A CONFLICT EXISTS, THE BOARD HOLDS A VOTE TO DETERMINE WHETHER A CONFLICT IS DEEMED TO EXIST, WITH ANY INTERESTED DIRECTOR OR OFFICER EXCLUDED FROM THE PROCEEDINGS.	
FORM 990, PART VI, SECTION C, LINE 19	THE ORGANIZATION'S GOVERNING DOCUMENTS, CONFLICT OF INTEREST POLICY, AND RECENT FEDERAL INCOME TAX RETURNS ARE MADE AVAILABLE FOR PUBLIC INSPECTION AT THE ORGANIZATION'S PRINCIPAL OFFICE DURING NORMAL BUSINESS HOURS.	
FORM 990, PART XII, LINE 2C:	THE PROCESS FOR OVERSIGHT AND SELECTION OF AN INDEPENDENT ACCOUNTANT HAS NOT CHANGED FROM THE PRIOR YEAR.	

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Schedule O (Form 990) 2023

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**SCHEDULE O**  
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► Attach to Form 990 or 990-EZ.

► Go to [www.irs.gov/Form990](http://www.irs.gov/Form990) for the latest information.

**2022****Open to Public Inspection**Department of the Treasury  
Internal Revenue ServiceName of the organization  
OPTIONS FOR YOUTH - SAN GABRIEL INCEmployer identification number  
95-4602181**990 Schedule O, Supplemental Information**

Return Reference	Explanation
FORM 990, PART VI, SECTION A, LINE 3	PROPEL INC., A CHARTER MANAGEMENT ORGANIZATION

**990 Schedule O, Supplemental Information**

Return Reference	Explanation
FORM 990, PART VI, SECTION A, LINE 8B	THERE ARE NO COMMITTEES THAT ACT ON BEHALF OF THE BOARD.

**990 Schedule O, Supplemental Information**

Return Reference	Explanation
FORM 990, PART VI, SECTION B, LINE 11B	THE FORM 990 IS PREPARED BY THE SCHOOL'S OUTSIDE PUBLIC ACCOUNTING FIRM BASED ON INFORMATION PROVIDED BY MANAGEMENT. ONCE A DRAFT OF THE RETURN IS AVAILABLE, IT IS REVIEWED BY MANAGEMENT WITH ANY CHANGES OR REVISIONS INCORPORATED INTO THE FILING. THE REVISED RETURN IS THEN SUBMITTED TO THE BOARD OF DIRECTORS FOR THEIR REVIEW AND APPROVAL PRIOR TO SUBMITTING TO THE IRS.

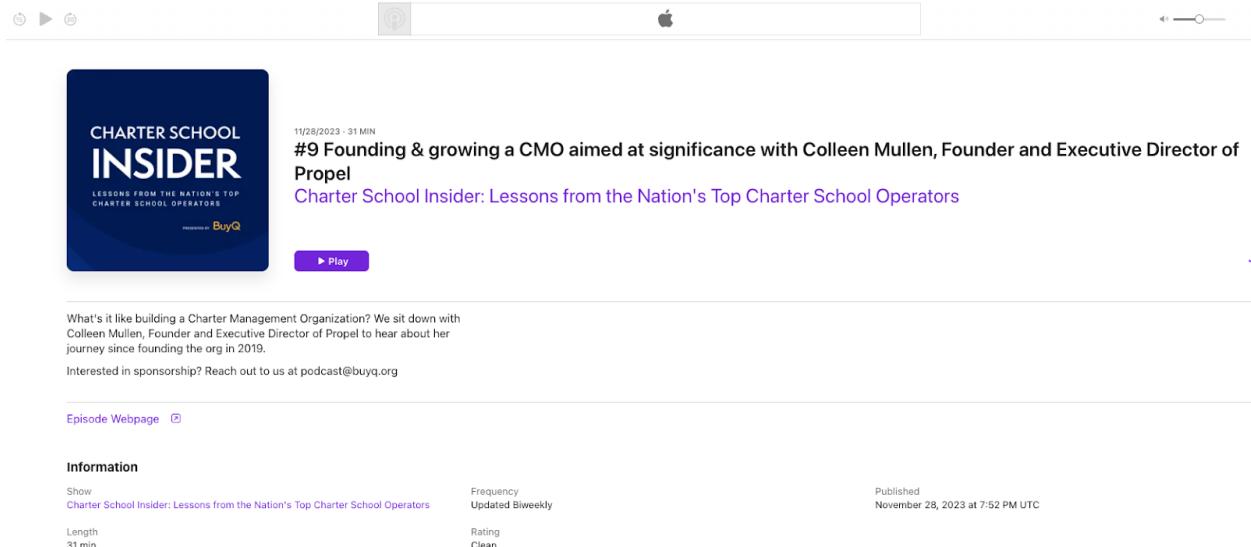
**990 Schedule O, Supplemental Information**

Return Reference	Explanation
FORM 990, PART VI, SECTION B, LINE 12C	THE ORGANIZATION DISTRIBUTES A WRITTEN CONFLICT OF INTEREST POLICY AND CODE OF ETHICS THAT APPLIES TO ALL EMPLOYEES. DIRECTORS ARE PROHIBITED FROM OWNING ANY INTEREST IN ANY ENTITY WITH WHICH THE ORGANIZATION ENGAGES IN ANY BUSINESS OR CONTRACTUAL RELATIONSHIP OF ANY KIND, AND ARE REQUIRED TO DISCLOSE ANY CONFLICTS OF INTEREST TO THE BOARD. ADDITIONALLY, THE ORGANIZATION PERIODICALLY SOLICITS BIDS FOR CONTRACTS FROM A POOL OF VENDORS AND AS A RESULT PERFORMS DUE DILIGENCE AS TO THE SAME VENDOR MULTIPLE TIMES. THIS FREQUENT CONTACT ALLOWS FOR MORE CONTINUOUS MONITORING OF POTENTIAL CONFLICTS. CONTRACTS WITH ANY VENDOR RELATED TO A DIRECTOR OR OFFICER ARE CONSIDERED RELATED PARTY TRANSACTIONS AND ARE REVIEWED BY THE BOARD WITH A HIGH LEVEL OF SCRUTINY. CONFLICTS ARE REQUIRED TO BE DISCLOSED TO THE BOARD PRIOR TO THE DISCUSSION OF THE PROPOSED CONTRACT, AND THE RELATED PARTY IS PROHIBITED FROM ANY DISCUSSION OR VOTING IN CONNECTION WITH THE CONTRACT. THE BOARD DETERMINES WHETHER THE CONTRACT PROVIDES THE GOODS OR SERVICES THAT ARE MOST NEEDED BY THE ORGANIZATION AND WHETHER THE BEST PRICE FOR SUCH GOODS OR SERVICES IS BEING OBTAINED IN COMPARISON WITH THE PROPOSED CONTRACT. IF THERE IS A QUESTION AS TO WHETHER A CONFLICT EXISTS, THE BOARD HOLDS A VOTE TO DETERMINE WHETHER A CONFLICT IS DEEMED TO EXIST, WITH ANY INTERESTED DIRECTOR OR OFFICER EXCLUDED FROM THE PROCEEDINGS.

**990 Schedule O, Supplemental Information**

Return Reference	Explanation
FORM 990, PART VI, SECTION B, LINE 15	THE EXECUTIVE DIRECTOR'S PAY IS DETERMINED BASED ON DATA PROVIDED BY EXTERNAL CHARTER MANAGEMENT ORGANIZATIONS AND THROUGH COMPARISON STUDIES OF OTHER CHARTER SCHOOLS. THE BOARD MUST VOTE TO APPROVE THE EXECUTIVE DIRECTOR'S COMPENSATION AS A DIRECT ACTION. THE OFFICERS AND KEY EMPLOYEES' PAY IS DETERMINED BASED ON DATA PROVIDED BY EXTERNAL CHARTER MANAGEMENT ORGANIZATIONS AND THROUGH COMPARISON STUDIES OF OTHER CHARTER SCHOOLS. THE BOARD MUST VOTE TO APPROVE THE OFFICERS AND KEY EMPLOYEES' COMPENSATION AS A DIRECT ACTION. DECISIONS ARE RECORDED IN THE MINUTES OF THE BOARD MEETING AND IN SEPARATE INSTRUCTIONS TO THE EXECUTIVE DIRECTOR TO IMPLEMENT THE DECISIONS.

## ATTACHMENT D



CHARTER SCHOOL  
**INSIDER**  
LESSONS FROM THE NATION'S TOP  
CHARTER SCHOOL OPERATORS  
PRESENTED BY BuyQ

11/28/2023 - 31 MIN  
**#9 Founding & growing a CMO aimed at significance with Colleen Mullen, Founder and Executive Director of Propel**  
Charter School Insider: Lessons from the Nation's Top Charter School Operators

Play

What's it like building a Charter Management Organization? We sit down with Colleen Mullen, Founder and Executive Director of Propel to hear about her journey since founding the org in 2019.  
Interested in sponsorship? Reach out to us at [podcast@buyq.org](mailto:podcast@buyq.org)

Episode Webpage [🔗](#)

**Information**

Show <a href="#">Charter School Insider: Lessons from the Nation's Top Charter School Operators</a>	Frequency Updated Biweekly	Published November 28, 2023 at 7:52 PM UTC
Length 31 min	Rating Clean	

course so yes my name is Colleen and I'm am the founder and the executive director of propel where Charter Management Group I have just over 10 years of experience in the charter school space um and an interesting slew of experience that's not relevant to this space from before that and I don't know if I should get into a little bit about me too and Propel but you know my undergraduate degree is in management and by the time this podcast airs I will likely have just completed graduate school and have earned my MBA from Pepperdine um with a focus in leadership and managing organizational change which feels absolutely insane and exciting and that obviously supports the work that we do at Propel and Propel was developed in response to some massive legislative swings in the state of California back in I believe it was 2018 Senate Bill 126 passed in our state which essentially required charter schools to comply with the same transparency requirements that school districts in our state comply with so things like government code 1090 Fair political practices commission form 700 filings public records act the brown act kind of all of those transparency requirements which charter schools had not previously been required to comply with Charter Schools now were required to comply with them so with the passing of that legislation CMOS also became required to comply with those same transparency requirements and based on the governance structure at that time for the schools that Propel now supports which are options for youth and opportunities for learning the network was unable to shift the structure that it currently had in place and so this need developed and I made the decision ultimately to capitalize on an opportunity to start this organization and continue to serve these Charter Schools like you mentioned that have been around since the charter school legislation passed in the state of California so kind of all of that outlines why our organization was formed but I think it's important to acknowledge that all of these formation efforts like I said were made specifically to support an existing network of schools that have previously been working with an incredibly comprehensive CMO and so this very high bar existed and early on we did everything in our power to kind of meet that bar and the last five years have just been a little bit crazy ever since then definitely a unique origin story and anytime you have to react in a short per period of time to new legislation it requires you know grit and Entrepreneurship and and quick thinking and certainly it seems like that was at the Forefront of you deciding to found the organization as you think about that origin story like you mentioned it's a little bit unique because you were supporting schools that had been around for a long time another management organization had been supporting them how did that shape those first couple years you kind of alluded to we were trying to maintain a certain level of Excellence that had been there like how did you think about those first couple of years and supporting those two groups of schools you mentioned options for youth and opportunities for learning yeah this is this is a really great question because it requires me to reflect on how far the organization has come in such a short amount of time I think the situation that we were dealt in the very beginning truly shaped how I was required to operate the organization as a business and then also how I intentionally LED my team team you know early on I had to be pretty Scrappy because me and my first 19 employees came from a very well-oiled machine with resources and experts and systems and processes and then all of a sudden we were disconnected from all of that and so for the first year mind you was 2019 2020 so it was the the covid year which casual a casual first year whole new set of opportunities for us to capitalize on but for that first year like I was a I was it I was tech support I was payroll I was accounting I was all of the things um and I did it because I knew that supporting our school's success was

ATTACHMENT E

[Full report linked here and available at FCMAT.org](http://FCMAT.org)



The image shows the cover of an audit report. The title "Extraordinary Audit" is at the top in a large, bold, black font. Below it, in a smaller black font, is the text "of the Options for Youth, Inc. and Opportunities for Learning, Inc. Charter Schools". The background of the cover is yellow with a faint image of a calculator and two pens. At the bottom, a dark blue banner contains the text "Commissioned by the Superintendent of Public Instruction in Cooperation with the Los Angeles, Orange, Sacramento, San Bernardino, and Siskiyou County Offices of Education". Below this banner, the date "August 9, 2006" is printed.

Administrative Agent  
Larry E. Reider  
Office of Kern County  
Superintendent of Schools

Chief Executive Officer  
Joel D. Montero

Commissioned by the Superintendent of Public  
Instruction in Cooperation with the Los Angeles,  
Orange, Sacramento, San Bernardino, and  
Siskiyou County Offices of Education

August 9, 2006

ATTACHMENT F

3321921

ARTICLES OF INCORPORATION  
OF  
PATHWAYS MANAGEMENT GROUP, INC.,  
A California Nonprofit Public Benefit Corporation

FILED  
In the Office of the Secretary of State  
of the State of California  
NOV 02 2010 *[Signature]*

I.

The name of this corporation is "PATHWAYS MANAGEMENT GROUP, INC."

II.

This corporation is a nonprofit public benefit corporation and is not organized for the private gain of any person. It is organized under the Nonprofit Public Benefit Corporation Law for charitable purposes.

The specific purpose of this corporation is to provide training, development, consulting, technical assistance and management services to nonprofit charter schools.

III.

The name and address in the State of California of this corporation's initial agent for service of process is:

Jamie Hall  
48 N. El Molino Avenue, Suite 101 A  
Pasadena, California 91101

IV.

A. This corporation is organized exclusively for charitable purposes within the meaning of Section 501(c)(3) of the Internal Revenue Code of 1986 (the "Code"), or the corresponding provision of any future United States Internal Revenue law. Notwithstanding any other provision of these Articles, this corporation shall not, except to an insubstantial degree, engage in any activities or exercise any powers that are not in furtherance of the purposes of this corporation, and this corporation shall not carry on any other activities not permitted to be carried on (1) by a corporation exempt from federal income tax under Section 501(c)(3) of the Code, or (2) by a corporation, contributions to which are deductible under Section 170(c)(2) of the Code.

B. No substantial part of the activities of this corporation shall consist of carrying on propaganda, or otherwise attempting to influence legislation, and the corporation shall not participate or intervene in any political campaign (including the publishing or distribution of statements) on behalf of any candidate for public office.



**STATE OF CALIFORNIA**  
*Office of the Secretary of State*  
**STATEMENT OF INFORMATION**  
**CA NONPROFIT CORPORATION**

California Secretary of State  
1500 11th Street  
Sacramento, California 95814  
(916) 657-5448

For Office Use Only

For Office Use Only

-EII F

— 11 —

· BA20251043913

#### • DESTROY

ed: 5/9/2025

1000

Entity Details			
Corporation Name	PATHWAYS MANAGEMENT GROUP, INC.		
Entity No.	3327921		
Formed In	CALIFORNIA		
Street Address of California Principal Office of Corporation			
Street Address of California Office	None		
Mailing Address of Corporation			
Mailing Address	320 N HALSTEAD STREET STE 280 PASADENA, CA 91107		
Attention			
Officers			
Officer Name	Officer Address	Position(s)	
<input checked="" type="checkbox"/> JOHN HALL SR.	320 N HALSTEAD STREET, SUITE 280 PASADENA, CA 91107	Chief Executive Officer	
<input checked="" type="checkbox"/> Jamie Donahue	320 N HALSTEAD STREET, SUITE 280 PASADENA, CA 91107	Secretary	
<input checked="" type="checkbox"/> John Hall Jr.	320 N HALSTEAD STREET, SUITE 280 PASADENA, CA 91107	Chief Financial Officer	
Additional Officers			
Officer Name	Officer Address	Position	Stated Position
<input checked="" type="checkbox"/> Joan Hall	320 N HALSTEAD STREET STE 280 PASADENA, CA 91107	Vice President	
Agent for Service of Process			
Agent Name	JOHN HALL		
Agent Address	320 N HALSTEAD STREET, SUITE 280 PASADENA, CA 91107		
Email Notifications		Yes, I opt-in to receive entity notifications via email.	
Opt-in Email Notifications			
Electronic Signature			
<input checked="" type="checkbox"/> By signing, I affirm that the information herein is true and correct and that I am authorized by California law to sign.			
John Hall, Sr.	05/09/2025		
Signature	Date		

## ATTACHMENT G (Amended)

# Options for Youth-California Inc.

EIN: 95-4768679 | Pasadena, California, United States

### Other Names

OPTIONS FOR YOUTH CALIFORNIA INC

OPTIONS FOR YOUTH-CALIFORNIA INC

### Publication 78 Data

Organizations eligible to receive tax-deductible charitable contributions. Users may rely on this list in determining deductibility of their contributions.

On Publication 78 Data List: Yes

Deductibility Code: PC 

### Form 990-N (e-Postcard)

Organizations who have filed a 990-N (e-Postcard) annual electronic notice. Most small organizations that receive less than \$50,000 fall into this category.

#### ▲ Tax Year 2022 Form 990-N (e-Postcard)

Tax Period: 2022 (07/01/2022-06/30/2023)	Mailing Address: 320 NORTH HALSTEAD STREET 280 PASADENA, CA 91107 United States	Gross receipts not greater than: \$50,000
EIN: 95-4768679	Principal Officer's Name and Address: COLLEEN MULLEN 320 NORTH HALSTEAD STREET 280 PASADENA, CA 91107 United States	Organization has terminated: No
Organization Name (Doing Business as): OPTIONS FOR YOUTH CALIFORNIA INC		Website URL: N/A

#### ▲ Tax Year 2021 Form 990-N (e-Postcard)

Tax Period: 2021 (07/01/2021-06/30/2022)	Mailing Address: 320 NORTH HALSTEAD STREET 280	Gross receipts not greater than: \$50,000
EIN:		

95-4768679	PASADENA, CA 91107 United States	Organization has terminated: No
Organization Name (Doing Business as): OPTIONS FOR YOUTH CALIFORNIA INC	Principal Officer's Name and Address: COLLEEN MULLEN 320 NORTH HALSTEAD STREET 280 PASADENA, CA 91107 United States	Website URL: N/A



## ▲ Tax Year 2017 Form 990-N (e-Postcard)

TOP

<b>Tax Period:</b> 2017 (07/01/2017-06/30/2018)	<b>Mailing Address:</b> 320 North Halstead St Ste 280 Pasadena, CA 91107 United States	<b>Gross receipts not greater than:</b> \$50,000
<b>EIN:</b> 95-4768679	<b>Principal Officer's Name and Address:</b> John Hall 320 North Halstead St Ste 280 Pasadena, CA 91107 United States	<b>Organization has terminated:</b> No
<b>Organization Name (Doing Business as):</b> OPTIONS FOR YOUTH-CALIFORNIA INC		<b>Website URL:</b>

## ▲ Tax Year 2016 Form 990-N (e-Postcard)

<b>Tax Period:</b> 2016 (07/01/2016-06/30/2017)	<b>Mailing Address:</b> 300 NORTH HALSTEAD ST STE 280 PASADENA, CA 91107 United States	<b>Gross receipts not greater than:</b> \$50,000
<b>EIN:</b> 95-4768679	<b>Principal Officer's Name and Address:</b> JOHN HALL 300 NORTH HALSTEAD ST STE 280 PASADENA, CA 91107 United States	<b>Organization has terminated:</b> No
<b>Organization Name (Doing Business as):</b> OPTIONS FOR YOUTH-CALIFORNIA INC		<b>Website URL:</b>

## ▲ Tax Year 2015 Form 990-N (e-Postcard)

<b>Tax Period:</b> 2015 (07/01/2015-06/30/2016)	<b>Mailing Address:</b> 320 North Halstead St Ste 280 Pasadena, CA 91107 United States	<b>Gross receipts not greater than:</b> \$50,000
<b>EIN:</b> 95-4768679	<b>Principal Officer's Name and Address:</b> John Hall 320 North Halstead St Ste 280 Pasadena, CA 91107 United States	<b>Organization has terminated:</b> No
<b>Organization Name (Doing Business as):</b> OPTIONS FOR YOUTH-CALIFORNIA INC		<b>Website URL:</b>

## ATTACHMENT H

4039845

FILED *6/29*  
Secretary of State  
State of California *SH*

ARTICLES OF INCORPORATION  
OF  
OPTIONS FOR YOUTH – ACTON, INC.

1 PC JUN 29 2017

I.

The name of this corporation is OPTIONS FOR YOUTH – ACTON, INC.

II.

This corporation is a nonprofit public benefit corporation and is not organized for the private gain of any person. It is organized under the California Nonprofit Public Benefit Corporation Law for public purposes.

The specific purpose of this corporation is to provide educational opportunities to students who have dropped out of the public school system or have problems with the public school system. The corporation shall recruit and educate students using independent studies and home study programs.

III.

The name and address in the State of California of this corporation's initial agent for service of process is:

John C. Hall  
320 N. Halstead St. Suite 280  
Pasadena, California 91107

IV.

The initial street address of the corporation is 320 N. Halstead St. Suite 280 Pasadena, California 91107.

V.

This corporation is organized and operated exclusively for public and educational purposes within the meaning of Section 501(c)(3) of the Internal Revenue Code of 1986, as it may be amended (the "Code"), including, for such purposes, the making of distributions to organizations that qualify as exempt organizations organized for said purposes under Section 501(c)(3) of the Code.

Notwithstanding any other provision of these Articles, this corporation shall not carry on any other activities not permitted to be carried on (1) by a corporation exempt from federal income tax under Section 501(c)(3) of the Code, or (2) by a corporation, contributions to which are deductible under Section 170(c)(2) of the Code.

No substantial part of the activities of this corporation shall consist of carrying on propaganda, or otherwise attempting to influence legislation, and the corporation shall not participate or intervene in any political campaign (including the publishing or distribution of statements) on behalf of any candidate for public office.

If at any time this corporation shall be treated as a private foundation under the Code, then:

1. The income of the corporation for each taxable year is to be distributed at such time and in such manner as not to subject it to tax under Section 4942 of the Code.
2. The corporation is prohibited from engaging in any act of self-dealing as defined in Section 4941(d) of the Code.
3. The corporation shall not retain any excess business holdings as defined in Section 4943(c) of the Code.
4. The corporation shall not make any investment that subjects it to tax under Section 4944 of the Code.
5. The corporation shall not make any taxable expenditure as defined in Section 4945(d) of the Code.

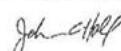
VI.

The property of this corporation is irrevocably dedicated to public and educational purposes, and no part of the net income or assets of this corporation shall ever inure to the benefit of any director, officer or member thereof or to the benefit of any private person. Upon the dissolution or winding up of the corporation, its assets remaining after payment, or provision for payment, of all debts and liabilities of this corporation shall be distributed to a nonprofit fund, foundation or corporation which is organized and operated exclusively for charitable purposes and which has established its tax exempt status under Section 501(c)(3) of the Code, or shall be distributed to the federal government, or to a state or local government, for public purposes. Any such assets not so disposed of shall be disposed of by the Superior Court of the county in which the principal office of the corporation is then located, exclusively for such purposes or to such organization or organizations as said Court shall determine which are organized and operated exclusively for such purposes.

VII.

The corporation is authorized to indemnify its agents (as defined in Section 5238 of the California Corporations Code) to the fullest extent permissible under California Law.

Dated: June 28, 2017



John C. Hall, Incorporator

I hereby declare that I am the person who executed the foregoing Articles of Incorporation, which execution is my act and deed.



John C. Hall, Incorporator

**BYLAWS  
OF  
OPTIONS FOR YOUTH-ACTON, INC.  
a California nonprofit public benefit corporation**

The Bylaws of Options for Youth-Acton, Inc., a California corporation ("the Corporation"), are hereby amended and restated in their entirety, as of June 3, 2018, (the "Effective Date"), as follows:

**ARTICLE I  
NAME AND PURPOSE**

**Section 1 NAME.** The name of this corporation (the "Corporation") is Options for Youth-Acton, Inc.

**Section 2. GENERAL PURPOSE.** The Corporation is a nonprofit public benefit corporation and is not organized for the private gain of any person. It is organized under the Nonprofit Corporation Law of California ("California Nonprofit Corporation Law") for charitable and educational purposes, as set forth in its Articles of Incorporation.

**Section 3. SPECIFIC PURPOSE.** The specific purpose of the Corporation is set forth in the Articles of Incorporation of the Corporation, as may be amended from time to time. The Corporation is organized and shall be operated for such purposes exclusively in furtherance of educational and charitable purposes within in the meaning of Section 170(c)(2)(B) and 501(c)(3) of the Internal Revenue Code of 1986, as amended (or the corresponding provision of any future United States internal revenue law) (the "Code") and charitable purposes within the meaning of Section 214(a)(6) of the California Revenue and Taxation Code (or the corresponding section of any future California revenue and tax law) (the "R&TC").

**ARTICLE II  
OFFICES**

**Section 1. PRINCIPAL OFFICES.** The Corporation's principal office shall be located at such place in Los Angeles County, California, or elsewhere as the Board of Directors (the "Board") shall from time to time determine. The Board is granted full power and authority to change the location of the Corporation's principal office.

**Section 2. OTHER OFFICES.** The Board of Directors or the President may at any time establish branch or subordinate offices at any place or places where the Corporation is qualified to do business.

**ARTICLE III  
DEDICATION OF ASSETS**

**Section 1. PROPERTY DEDICATED TO NONPROFIT PURPOSES.** The property and assets of the Corporation are irrevocably dedicated to educational and charitable purposes within the meaning of Sections 170(c)(2)(B) and 501(c)(3) of the IRC and charitable purposes within the meaning of Section 214(a)(6) of the R&TC. No part of the net income or assets of the Corporation shall ever inure to the benefit of any of its Directors or Officers, or to the benefit of any private person, except that the Corporation is authorized and empowered to pay reasonable compensation for services rendered and to make payments and distributions in furtherance of the purposes set forth in Article 1 hereof.

**Section 2. DISTRIBUTION OF ASSETS UPON DISSOLUTION.** Upon the winding up and dissolution of the Corporation, its assets remaining after payment or adequate provision for payment of all debts and obligations of the Corporation shall be distributed in accordance with a plan of dissolution recommended by the Board of Directors of the Corporation and approved by the Member of the Corporation to one or more nonprofit corporations that are organized and operated exclusively for educational and charitable purposes and recognized by the Internal Revenue Service as exempt from federal income tax pursuant to Section 501(c)(3) of the IRC.

## ARTICLE IV MEMBERSHIP

**Section 1. SOLE MEMBER.** Options for Youth-California, Inc., a California nonprofit public benefit corporation, shall be the sole member of the Corporation (the "Sole Member").

**Section 2. RIGHTS AND POWERS OF THE SOLE MEMBER.** As the sole member of the Corporation under the California Nonprofit Corporation Law, the Sole Member has all corresponding statutory rights and powers of membership. In addition, the Sole Member has the power (which are termed the "Reserved Powers" of the Member) to take or approve the following actions:

- (a) Admit additional members to the Corporation, under such criteria as the Sole Member may establish from time to time. The Sole Member and additional members, if any, will be hereinafter referred to individually as a "Member" and collectively as the "Members";
- (b) Approve or change the role and purpose of the Corporation;
- (c) Amend the Bylaws and Articles of Incorporation of the Corporation;
- (d) Fix the number, and appoint and remove the Directors of the Corporation;
- (d) Approve the merger, consolidation, reorganization or dissolution of the Corporation and the disposition of the assets of the Corporation upon dissolution;

(e) Approve the incurrence of debt or guaranties of the Corporation above certain thresholds as may be established by the Sole Member from time to time;

(f) Approve capital expenditures above certain thresholds as may be established by the Sole Member from time to time;

(g) Approve any other action by the Corporation that has been established by resolution of the Sole Member as requiring its approval.

**Section 3. ELECTION OF OFFICERS BY THE SOLE MEMBER.** The Sole Member shall have no right or authority to select or remove Officers of the Corporation. Officers shall be elected by the Board of Directors as provided in Article VI, below.

**Section 4. ANNUAL MEETINGS.** The Members shall have an annual meeting, which shall be held on a date and time specified by the Sole Member. Any date so designated by the Sole Member shall be within five (5) months after the end of the fiscal year of the Corporation, which is June 30, and within fifteen (15) months after the last annual meeting. If the scheduled date falls on a legal holiday, the meeting shall be held on the next succeeding business day. At the meeting, Directors shall be selected by the Sole Member and other proper business may be transacted.

**Section 5. SPECIAL MEETINGS.** The Sole Member, or fifty percent (50%) or more of the Members, may call a special meeting of the Members for any lawful purpose at any time.

Any Officer of the Corporation may call a meeting of the Members for any lawful purpose at any time. Notice of a special meeting shall be given by the Officer calling such meeting or by any other Officer of the Corporation, with such notice to be given not less than ten (10) days prior to the date of the special meeting, unless such notice is waived in writing by the Members.

No business, other than the business that was set forth in the notice of the meeting, may be transacted at a special meeting.

**Section 6. PLACE OF MEETINGS AND MEETINGS BY TELEPHONE.**

Meetings of the Members shall be held at any place within or outside the State of California designated by the Board or by the written consent of all Members entitled to vote at the meeting, given before or after the meeting. In the absence of any such designation, Members' meetings shall be held at the Corporation's principal office. Special meetings of the Members shall be held at any place within or outside the State of California that has been designated in the notice of the meeting or, if not stated in the notice or if there is no notice, at the principal executive office of the Corporation. Any meeting, regular or special, may be held by conference telephone or similar communication equipment, so long as all Members participating in the meeting can hear

## ATTACHMENT I

..4246250

ARTICLES OF INCORPORATION  
OF  
PROPEL, A CHARTER MANAGEMENT GROUP, INC.

ch  
FILED  
SECRETARY OF STATE  
STATE OF CALIFORNIA

ARTICLE I  
NAME

16 FEB 26 2019

The name of the corporation (the "Corporation") shall be Propel, A Charter Management Group, Inc.

ARTICLE II  
PURPOSES

The Corporation is a nonprofit public benefit corporation and is not organized for the private gain of any person. It is organized under the Nonprofit Public Benefit Corporation Law for public and charitable purposes.

The specific purpose of the Corporation is to promote social welfare within the meaning of Section 501(c)(4) of the Internal Revenue Code of 1986, as amended, or the corresponding provisions of any future United States internal revenue law (the "Code"), including without limitation by:

- A. Developing, supporting, administering, managing, facilitating, and, to the extent permitted by applicable law, directly conducting the educational programs and operations of one or more California public charter schools, and in particular (without limitation) such schools that provide high quality education in non-traditional learning environments for the benefit of children living in socioeconomically disadvantaged inner city communities.
- B. Otherwise promoting, supporting and advancing nonprofit public charter school education, including in particular, and without limitation, nonprofit public charter schools that provide high quality non-traditional learning environments for children living in socioeconomically disadvantaged inner city communities in California.
- C. Otherwise promoting, supporting and conducting programs, services and activities that enrich and benefit youth.
- D. Engaging in any and all other lawful acts or activities, and exercising all such powers, rights and privileges applicable to California nonprofit public benefit corporations that are incidental to and in furtherance of these purposes and which are consistent with applicable law and the Articles of Incorporation and Bylaws of the Corporation.

4246250

ARTICLE III  
TAX EXEMPTION PROVISIONS

The Corporation is organized and shall be operated exclusively to promote social welfare within the meaning of, and consistent with, Section 501(c)(4) of the Code. No part of the net earnings of the Corporation shall inure to the benefit of, or be distributed to, any private shareholder or individual; provided, however, that the Corporation is authorized and empowered to pay reasonable compensation for services rendered to it. Any other provision of these Articles of Incorporation notwithstanding, this Corporation shall not carry on any activities not permitted to be carried on by a corporation exempt from federal income tax under Section 501(c)(4) of the Code.

ARTICLE IV  
DISSOLUTION

Upon the winding up and dissolution of the Corporation, its assets remaining after payment or adequate provision for payment of all debts and obligations of the Corporation shall be distributed in accordance with a plan of dissolution recommended by the Board of the Directors of the Corporation and approved by the member of the Corporation, if any, to one or more nonprofit corporations approved by the Board of Directors that is then organized and operated exclusively for social welfare purposes within the meaning of Section 501(c)(4) of the Code, and that is recognized by the Internal Revenue Service as exempt from federal income tax pursuant to Section 501(c)(4) of the Code.

ARTICLE V  
AGENTS FOR SERVICE OF PROCESS

The name and address of this Corporation's initial agent for service of process is:

Cogency Global Inc.

ARTICLE VI  
ADDRESS

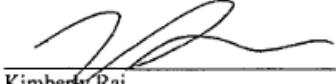
The Corporation's initial mailing and street address are as follows:

320 N. Halstead Street, Suite 230, Pasadena, CA 91107

[Signature page follows]

4246250

Date: February 26, 2019.



Kimberly Rai

*[Signature Page to Articles of Incorporation of Propel, A Charter Management Group, Inc.]*

**ATTACHMENT J**



## **Options For Youth – Acton Charter Renewal Petition**

Submitted to: Acton-Agua Dulce Unified School District  
Submitted on: February 13, 2025

Term: 5 Years (July 1, 2025 – June 30, 2030)



## 1. Leadership Team

OFY-Acton has an experienced and respected senior leadership team, which will continue to serve the Charter School. A short biography for each of our current leadership team members is included in **Exhibit A: Leadership Team Biographies**.

## 2. Board of Directors

The Charter School has also benefited from the wisdom and multi-faceted experience of a Board of Directors consisting of respected professionals from various fields. A list of the Charter School's current Board of Directors is included in **Exhibit I: Board of Directors' Biographies**.

## 3. Educational and Operational Services and Support

The Charter School contracts for educational and operational services and support, as needed. The Board of Directors shall have ultimate responsibility for the operation and activities of the Charter School. The Charter School will comply with all laws applicable to the provision of services to charter schools, including Education Code section 47604 (AB 406). Examples of the types of educational and operational services and support the Charter School has contracted for at the time of submission of this charter renewal petition (or may contract for) include, but are not limited to, the following:

- Charter Management Organization ("CMO") services at the direction of and on behalf of the Charter School's Board of Directors. The Charter School has contracted with **Propel, A Charter Management Group, Inc.** for CMO services.
- Backoffice services such as human resources, payroll, board relations, accounting, and other related administrative services. The Charter School has contracted with **9 Dot Education Solutions, LLC** for back office services.
- Strategic planning, curriculum, professional development, and compliance support services. The Charter School has contracted with **Skyrocket, Inc.** for these services.
- Information technology services, including software, hardware, and network platforms. The Charter School has contracted with **AllTech Enterprises, LLC** for these services.
- Web-based student information system and related support services. The Charter School has contracted with **Education Dynamics, Inc.** for student information system services.
- Special education and related services, such as from a Nonpublic, Nonsectarian Agency ("NPA"). The Charter School has contracted with **Prep for Success, LLC** for NPA services.

The Charter School may add or change service providers as necessary or appropriate during the charter renewal term.

## 4. OFY-Acton's Accomplishments During Initial Charter Term

During the current charter term, the Charter School has experienced many successes including, but not limited to, the following:

### **At the Charter Level:**

- Received WASC Accreditation through June 30, 2028 – a six-year term.
- Successfully transitioned to a new student information system – Student Trac.

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### **Program Overview**

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intervention specialist, English Language specialists, and tutoring are offered in a manner flexible enough for students to take advantage of the unique structure of the curriculum, and to provide additional support to students as they matriculate through their learning plan.

f) *Online/Virtual Learning*

The online/virtual learning modality targets students who can benefit most from individualized instruction that is delivered at home via technology. Students have the opportunity to take their courses through the Charter School's blended learning model using the Edmentum Learning platform along with the Skyrocket Student Activity Workbooks (SAWs) and teacher instruction available at the Charter School's resource centers. The online-based/virtual component of the blended learning program offers students interactive, mastery-based lessons in English, math, science, social science, foreign language, visual and performing arts, as well as elective courses. Courses are monitored and facilitated by teachers who are skilled in providing instructional strategies specific to online/virtual learning. The program accommodates various reading levels by using a variety of instructional strategies including spoken text, transcripts of videos, interactive dictionaries, and the ability to have the text read to the students in their primary language. A calendar is provided to assist students with time management by providing assignment due dates as well as pacing guides. Student progress and results are monitored by Charter School instructional staff to ensure the successful completion of each course.

The Charter School maintains a 1:1 student-to-technology device ratio. All students have access to Chromebooks. Hotspots devices are available to students on an as needed basis.

g) *Experiential Learning*

A goal of the Charter School is to offer students opportunities to learn through hands-on real life experiences and cultural immersion. A major component of preparing students for college and career readiness can be achieved, in part, by affording access to travel and career and college exploration outside of a traditional field trip model. Social-emotional learning through experiential activities and community services are embedded within the program. The Charter School partners with nonprofit organizations to provide students an exceptional selection of job training and career preparedness courses, college tours, domestic travel, international travel, and community service activities. All experiential learning and community service programs will be provided at no cost to all OFY-Acton students. **These experiential learning trips are contracted with a third party after a competitive cost analysis or Request for Proposal process.**

Many students attending the Charter School experience limited exposure outside of their immediate surrounding communities. The Charter School believes that students are more likely to envision themselves in, and work diligently toward, succeeding in an environment outside of what has been modeled locally through demystifying the path to success. As such, we provide opportunities for students to gain hands-on experience in multiple career sectors, visit colleges throughout California and the USA, and experience the fulfillment one has by putting in a hard day's work to serve those in need and to positively impact communities. These experiential learning opportunities have proven to be truly transformative in opening our students' eyes to vast opportunities outside of what they have experienced in their lives. We have seen students re-engage in our program significantly after returning from these trips - thus impacting their work product and academic performance in highly positive ways. Students also return from experiential learning trips with a new appreciation of what the world has to offer. All trips

offer students the opportunity to earn high school credits. Examples of past experiential learning opportunities that have been offered to OFY-Acton's students are briefly detailed below.

#### **Black Bird Farm, Camp Blackbird**

Blackbird Farm is a nonprofit learning camp located in Philo, CA, consisting of over 240 acres of organic fruit orchards, a large organic teaching garden, and an outside learning kitchen. At Blackbird Farm, students participate in Career Explorations. Students are introduced to multiple careers including construction, marketing, hospitality, and animal husbandry within the setting of an organic teaching farm. Blackbird Farm staff and the Charter School teachers collaboratively to show students how they may transfer the skills learned at Blackbird Farm to their lives and future careers.

#### **Rocky Mountain Pathways Ranch, Allenspark**

Rocky Mountain Pathways Ranch ("RMPR") is a nonprofit organization located in Allenspark, Colorado, on 56 acres on the edge of Rocky Mountain National Park, features ten-day learning camps in which students take over operations on an existing dude ranch. This experience enhances student learning by involving them in various ranch-oriented activities, which count towards community service credits. The RMPR program is designed to push student out of their comfort zone and into an area of personal growth and development. Students care for ranch animals and learn to saddle and ride horses. Students are also educated on the nature surrounding RMPR and participate in team building, leadership, and personal growth activities.

#### **Hello Havana! Cuba**

The Cuban excursion allows students to visit local homes and historic landmarks and discuss the Cuban economy with prominent locals. Participants have taken morning nature hikes, visited a vintage car garage, eaten family-style lunches on a fruit and vegetable farm and learned how to salsa. These activities provide ample opportunity for students to soak up Cuban culture and tradition, changing their lives forever.

#### **Viva Italia! Italy**

An eleven-day day trip through Venice, Florence, and Rome immerses students in the Italian culture, cuisine, and history as they come face-to-face with priceless works of art, learn how to make pasta, and tour the Vatican and Roman ruins. Students explore the rich artistic heritage of Italy by taking art classes, meeting local artists, and touring museums.

#### **Ni Hao from Beijing! China**

Students may embark on a once-in-a-lifetime experience in beautiful China. Students spend twelve days discovering local treasures, divulging in local cuisines, and journeying through urban cities. From the Great Wall to the Forbidden City, students gain insight on Chinese culture and its historical importance. Emphasis on full cultural immersion enables students to partake in activities including a lesson on Chinese calligraphy in Beijing, feed baby pandas at the Dujiangyan Panda Keeper Program and visit the terracotta warriors in Xi'an.

#### **Pathways Ireland**

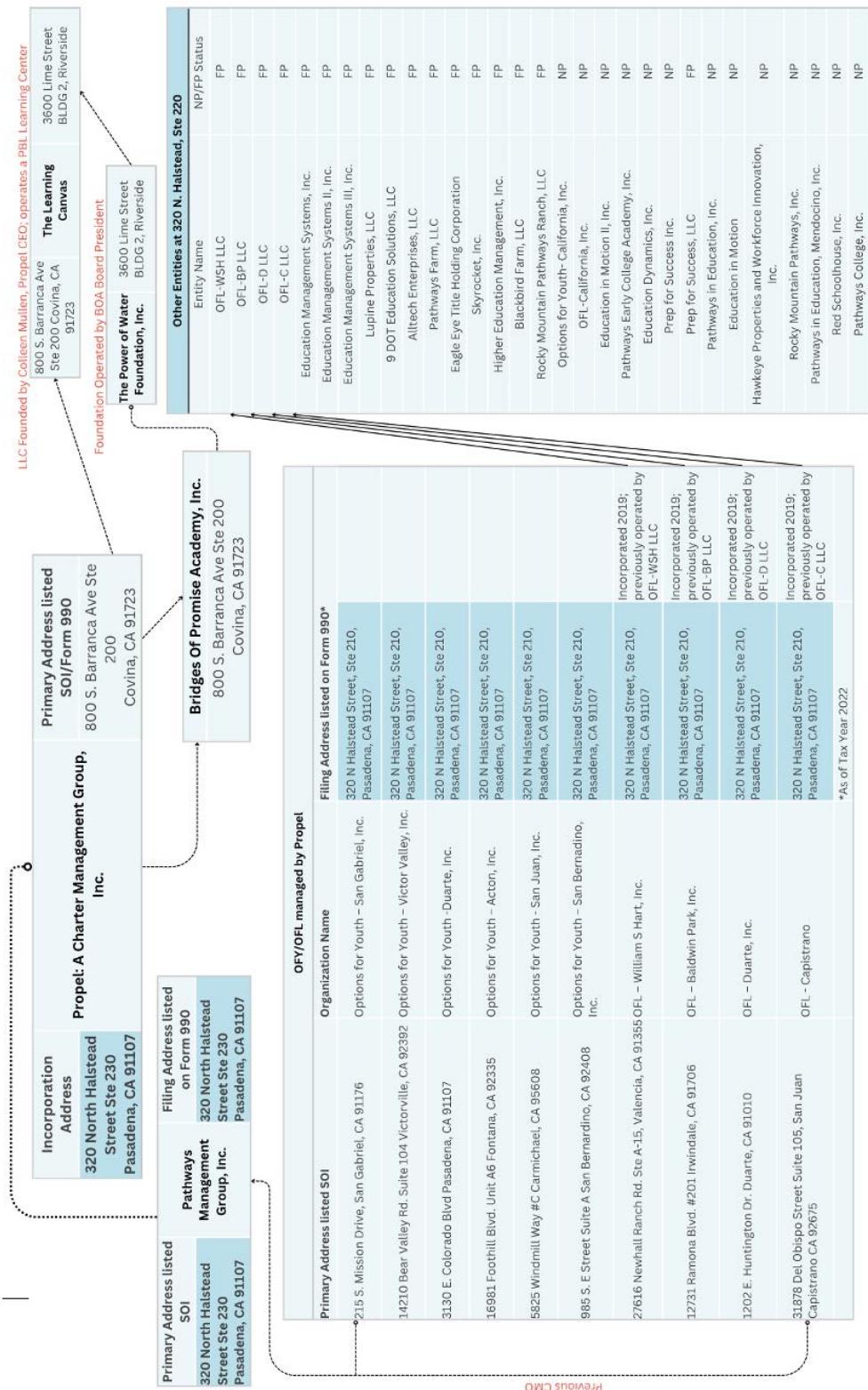
Pathways Ireland is a twelve-day adventure to the Emerald Isle. From rugged coastlines to rolling countrysides, charming villages to valleys dotted with sheep, experience Ireland's natural beauty and local culture. Students will travel beyond the major cities to explore the towering Cliffs of Moher by boat, wander past ancient rock formations at Giant's Causeway, and stop at small towns along the Atlantic coast. On Pathways Ireland students will discover why Ireland's culture, geography, and history has been

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#### **Element 1 (A): Description of Educational Program**

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