

Haverhill Public Schools

December 3, 2018

We would like to thank the Department of Elementary and Secondary Education for the opportunity to submit comments regarding the proposed opening of a second Montessori charter school in Haverhill. Our comments are specific to the merits of the present prospectus and are not a commentary on charter schools in general. We believe there are successful charter school models operating across our Commonwealth, however, the proposed school would provide educational benefit to only a subset of students. We are concerned that the school as described would deepen, rather than alleviate the inequities rooted within our community.

There are two main areas of concern regarding the proposal. First, the proposed charter school's fiscal impact on the remaining schools and students in the district. Second, the ability of the proposed micro-school's model to provide a free appropriate public education to high needs students.

The proposed school would grow over the next five years to reach a stated \$1.8 million fiscal impact on HPS. While some may think that the district can simply reduce classrooms by the number of classrooms added in the charter, logistically, it is far more complicated. With over a dozen K-8 schools in HPS, the 240 students attending Wildflower would be spread across 8 grades in 12 or more locations – making the closure of classrooms and the reduction of costs within HPS unlikely despite the reduced funding intake.

In addition to the stated costs, the proposal indicates that transportation will be provided by Haverhill Public Schools, yet, the authors seem unaware of the impact of 6 small school locations with simultaneous start and end times that are concurrent with the HPS. The proposed structure will necessitate additional bus routes. Again, while it may at first glance appear that busing services already exist within the district, the operational reality is that new routes and drivers would need to be added to accommodate the school. The cost per bus hovers around \$75,000 annually. These additional buses would be in-play with the afternoon traffic as they load in the congested downtown area.

The one-room schoolhouse concept, while charming has significant operational hurdles. The lack of a gymnasium is proposed to be overcome through the use of outdoor spaces and community partners. This is a complicated solution for students with physical limitations as maneuvering of the sidewalks and side-streets in an old mill city is difficult for people with limited mobility. Additionally, the use of partner space during inclement weather will likely require transportation and accompanying transportation costs. In addition, the likelihood that the part-time nurse allocated to the six locations would be available for students with asthma, diabetes, or injury in these off-site settings is unlikely.

The prospectus states that the proposed school will “serve a diverse student population that includes higher percentages of students with disabilities, low-income students, and English Language Learners than Haverhill Public Schools” (p. 19). The budget states the charter school is assuming a 20% special education rate. HPS has a 23% special education rate and includes in its calculations students in substantially separate educational settings and out-of-district programs. Each of these settings are extremely costly and are not included in the school’s calculations or planning process. Furthermore, the existing Haverhill Wildflower preschools which will likely populate the charter have a combined 38% Low Income/Economically Disadvantaged population versus HPS 47% and combined 14% First Language Not English population versus HPS 16.5%. As noted in the application (p. 23), the City of Haverhill has provided \$26,000 in scholarships to support low income families in attending the Wildflower Preschools.

Furthermore, and perhaps most concerning, the prospectus appears to confuse the need for all teachers to obtain SEI endorsement with the need for an English as a Second Language (ESL) license and the daily provision of a specific ELD (English Language Development) Curriculum. Beginner level English learners require by law at least two to three periods (a period is not less than 45 minutes) per day of direct ESL instruction, delivered by a licensed ESL teacher. There is no provision in the budget for such teachers. SEI endorsement is mentioned, and in fact SEI endorsement training is a PD expense for the first year. This expense indicates that the selected staff will likely not have this endorsement or experience needed to work with ELs. The prospectus notes the desire to seek dually certified special education teachers; no such notation is alluded to in regards to ELs.

When looking at the needs of SWD (students with disabilities), while a dually certified teacher may meet the needs of some students, this service delivery model does not meet IDEA’s regulatory requirement to have a continuum of service options for students with disabilities and misinterprets the tenets of Least Restrictive Environment. The prospectus offers no options or descriptions for special education disability specific classrooms and offers extremely limited funding for related services. The budget states that special education related services are budgeted at \$250 per student per month. Related services would include, speech, occupational therapy, physical therapy, counseling services, ABA services and more. It is stated that contracted services from an agency such as North Shore Consortium will be utilized. Such contracted services typically cost \$80-\$125 per provider per hour and are provided to students on a weekly basis often with multiple types of services per student per week. The plan and funding allocations seem inadequate to meet the needs of SWD students.

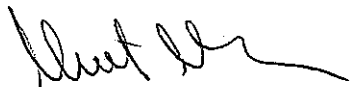
The section regarding the identification of students with disabilities also raises some concerns about the understanding of the needs and rights of students with disabilities, as it only refers to learning disabilities, not the other nine disability categories defined in Massachusetts law, including autism, physical disabilities, communication and emotional disabilities; each of which are prevalent in our classrooms.

The part-time nature of the EL Director and Special Education Director, even as the school reaches capacity give further evidence of the lack of attention to the needs of our students. These positions are designed to support teachers in providing specialized instruction, yet the individuals by definition would be unavailable to be in classrooms on a daily basis to observe instruction and to provide related services by the contracted providers. The multi-site design only serves to complicate the already insufficient time allotment.

Finally, the prospectus states that "HPS has been identified as Level 5" for the last two school years (p. 22). When the accountability system utilizing Levels was in place, Haverhill was a Level 3 school district. The district was never designated Level 4, much less Level 5. This lack of understanding of the accountability system and knowledge of the district school system is concerning.

Given the operational, funding and staffing structures of the proposed charter operation, the school system has serious concerns about the ability to meet the needs of the stated target students. We are sincerely concerned that the school will deepen the inequities in our city and unintentionally cause greater divide.

Sincerely,



Margaret Marotta
Superintendent of Schools



James Fiorentini
Mayor, City of Haverhill