Adams-Arapahoe School District 28-J a/k/a Aurora Public Schools (“District”), through its attorneys, Caplan and Earnest LLC, submits this Answer Brief in support of the Aurora Public Schools Board of Education’s (“District Board”) decision to deny the charter application of Cooperative Community Schools (“CCS”).

I. INTRODUCTION

CCS seeks District authorization for a teacher-led cooperative offering a project-based, mastery-based, blended learning instructional model rooted in the permaculture-based ethics of sustainability, equanimity, and respect for all people and the environment. (CCS Charter School
Application (hereinafter referred to as the “Application”) at § A.) CCS initially applied to the District for charter school authorization in the fall of 2014.1 (Op. Brief at 11.) The District Board denied the application because CCS did not demonstrate adequate leadership structure or capacity; did not have evidence of capacity to serve students with disabilities, to monitor the progress of and assess students, or to provide financial and academic oversight to the school; and was not economically sound.

CCS re-applied for authorization on March 11, 2015. (See Application.) Following lengthy review and analysis of the CCS application (the “Application”) by District staff and community stakeholders,2 as well as independent review of the Application by the Charter School Institute (“CSI”),3 the District Board denied the Application, citing twenty-two reasons in support of its decision. (See Unnumbered Resolution Adopted June 16, 2015 (hereinafter referred to as the “Resolution”); Recommendation, Cooperative Community Schools Application from Rico Munn and Lisa Escárcega (hereinafter referred to as the “Recommendation”). CCS now asks the State Board of Education (the “State Board”) to remand this decision back to the District Board for reconsideration. (Op. Brief at 2.)

To give credence to its appeal, CCS casts aspersions on the District’s motives, accusing it of distorting the Application and being insincere and willfully ignorant in its review process.4 (Op. Brief at 2, 3.) In reality, the District’s determination that CCS did not have the educational

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1 In 2014, CCS also applied to the Charter School Institute for authorization. (See Application § G at 2; Op. Brief at 11.)
2 The District review process included an interview between CCS and the District’s Applicant Review Team. See APS Interview Response (hereinafter referred to as the “Interview”). The District permitted CCS to supplement its interview responses in writing. Id.
3 See CSI New School Risk Assessment (hereinafter referred to as the “CSI Assessment”).
4 CCS does not detail the reasons for believing the District to be insincere and willfully ignorant in its denial of the Application. The District has been active in providing school choice options for its students, as evidenced by its approval of multiple charter schools, including one that submitted an application during the same cycle as CCS (Laurus Collegiate Charter School), and by its partnership with CSI to ensure maximum flexibility for charter school applicants.
expertise or financial resources to implement and sustain its vision is amply supported by the record on appeal, and by the independent analysis of CSI, which reviewed the Application and assessed it as High Risk. (See e.g., Application, Recommendation, Resolution, and CSI Assessment.) For these reasons, approving the Application was not in the best interests of the District, its students, or its community.

II. STATEMENT OF FACTS

A. Stipulated Facts.

The parties agreed to the “Stipulated Facts” listed in CCS’s Opening Brief.

B. Disputed Facts.

All other facts may be disputed and appear in the parties’ argument sections.

III. STANDARD OF REVIEW ON APPEAL

The State Board may overturn the District Board’s decision only if it finds that CCS has proven that the District Board acted contrary to the best interests of the District, its students, or its community.\(^5\) To make such a finding – to substitute the State’s judgment as to what is best for the District for the judgment of the District’s elected school representatives – is no light undertaking. Recognizing this, the legislative sponsors of the Charter Schools Act, C.R.S §§ 22-30.5-101 to -120 (the “Act”), emphasized the need for the State Board to exercise restraint and resist the temptations of activism; to recognize locally elected officials’ knowledge of and responsibility for their own communities’ needs; and to overturn such decisions only in the “most egregious cases” when the decision is “arbitrary or capricious.”\(^6\) This appeal does not adequately refute the District’s valid

\(^5\) Section H. 1 of the Colorado State Board of Education’s 2008 Revised Administrative Policy on Charter School Appeals (“State Board Rules”) places “the burden of proof . . . on the appellant.”

\(^6\) See Hearings before the Senate Committee on Education, Sen. Owens: “I’m real comfortable that the state board is not going to step in except where [the local board’s] been arbitrary and capricious . . . .” (Tape 5A, 179) (emphasis added); Conference Committee, May 8, 1993, Sen. Owens: “I think it’s key that we have some ability to get [the charter] granted if the local board is so recalcitrant that it’s just not going to [grant it], and . . . I just don’t think the state board is going to overrule [the local board] except in the most egregious cases.” (Tape 8A, 083) (emphasis added); Rep. Anderson: “in there it does say [when a local board’s decision] ‘was contrary to the best interests,’ in
concerns, let alone present such an extreme case. Therefore, the District Board’s decision should be affirmed.

IV. ARGUMENT

The Act requires a local board to state its reasons for the denial of a charter application and “[t]he person bringing the appeal shall limit the grounds of the appeal to the grounds for denial of a charter application.” C.R.S. §§ 22-30.5-107 (4) and 108 (2) (2014). In its Opening Brief, CCS dismisses as unfounded or unreasonable each of the twenty-two reasons in support of the District Board’s decision to deny the Application. (Op. Brief at 3.)

As a general matter, any one of the reasons outlined in the Resolution represents a valid concern about CCS’s ability to implement its educational model, and CCS concedes a number of them in its Opening Brief. However, some of the limitations that CCS demonstrated in the Application and during the application process are particularly egregious. Without yielding the importance of each ground as a basis for the District Board’s denial, the following deficiencies, whether taken alone or in concert, are undeniable evidence that approval of the Application is not in the best interests of the District, its students, or its community.

A. CCS Demonstrated a Very Limited Understanding of State Accreditation, Accountability, and Reporting Requirements.

Under the Act, charter school applicants are required to demonstrate an understanding of school accountability by identifying student performance standards that comply with state law

other words you’re saying there’s a reason, . . . to me you’re looking at an arbitrary decision when you’re having that language in there.” (Tape 8A, 250); Conference Committee, May 10, 1993, Rep. Agler: “[M]y contention is that the state board is not going to be out there panting to do this, they absolutely are going to avoid at all costs and they’re only going to step in when [a decision] is totally egregious.” (Tape 8B, 484) (emphasis added).

7 For example, CCS acknowledges that its application does not demonstrate an understanding of the procedural requirements for state reporting, accountability, and accreditation, and does not contain a legally compliant schedule. (Op Brief at 4, 8-9.) CCS blames these deficiencies on outside sources and typographical errors, and cites its good faith efforts to comply with the law. It is difficult to square this excuse with the fact that this is CCS’s second application attempt this year. Errors like these at this point in CCS’s experience either reflect a lack of attention to detail or a willful ignorance of the statutory framework governing charter schools.

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and by outlining a plan to evaluate student performance across curriculum in accordance with state standards. C.R.S. § 22-30.5-106(c) & (f). CCS failed to satisfy this requirement in a number of regards.

First, CCS demonstrated a poor understanding of performance indicators used in the accreditation process. For example, the Application contained no goals for student academic growth, which is 50% of a school’s School Performance Framework (SPF) rating. C.R.S. § 22-11-204(1)(a)(I); see Recommendation at § C; Application at § C. Though the Application proposed goals for student achievement, such goals are only for students who have been continuously enrolled in CCS for at least two years. See Recommendation at § C; Application at § C. There were no academic or achievement goals for the school during its first two years of operation and CCS did not identify an assessment protocol for students during this time. See Recommendation at §§ C, F; Application at §§ C, F. This means that for the first two years of its existence, CCS would not have had any student achievement or academic growth data with which to measure the success of, be accountable for, and improve its instructional model.

Additionally, despite the school’s goal to enroll a student body that is largely comprised of students in primary grade levels, CCS failed to identify a READ Act assessment for students in grade K-3. Id. During their interview, CCS founding board members were not able to identify an appropriate assessment and had little-to-no knowledge of school readiness requirements. Recommendation at § C. CCS likewise failed to identify a sufficient assessment

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8 District reviewers noted that the CCS student achievement goals were not aligned with the school’s objectives, strategies, and mission and were based on data that was two years old.

9 CCS plans to use a “collection of achievement data from students’ previous schools, preliminary and interim assessments...in concert with students’ Personal Learning Plans” as the information that will be factored into the SPF for Year 1, demonstrating that CCS has no understanding of how SPFs are calculated by the state. (Application § C, at 1). In addition, the plan to use Year 1 SPF as a single data point to revise performance objectives reflects CCS’s limited knowledge of how to set realistic and rigorous targets.

10 CCS indicated that students would complete daily quizzes through CompassLearning. However, CCS could not explain how the data from the quizzes would be shared with instructional staff and advisors for purposes of improving and correcting instruction.
protocol for English language learners and could not explain how it intended to administer state-
required assessments to students in a mastery-based model that does not employ grade levels.
Id.; see also Evaluation Rubric – Jean B at § F and Evaluation Rubric – Lisa E at §§ C, F.

The deficiencies set forth above are among the reasons for the District Board’s decision to deny CCS’s first charter school application. As noted by one District reviewer, CCS made no effort to address these concerns in the Application. Even CSI concluded that CCS did not meet application criteria in this content area. See Evaluation Rubric – Lisa E at § C; CSI Assessment at 8-9. A school that does not have a basic understanding of accreditation and accountability is not in the best interests of the District, its students, or its community.

B. CCS’s Proposed Instructional Practices Did Not Offer an Effective Educational Framework for ELL Students.

The target population for CCS is low-income, at-risk youth, forty-five percent\(^\text{11}\) of whom will be English language learners (“ELL students”).\(^\text{12}\) (Application, § K at 7.) CCS proposes to deliver mastery-based, blended learning to this population using CompassLearning software. (Interview at Question 45.) As a preliminary matter, there is little-to-no evidence of effectiveness with the target population using the instructional model that CCS proposes. (Interview at Question 19; Recommendation at Section E.) Setting this fact aside, the instructional practices that CCS proposes to use with the targeted student population are deficient in other critical ways.

Pursuant to an agreement with the Office for Civil Rights, District schools, including District charter schools, are required to offer, on a daily basis, 45 to 50 minutes of English language development (ELD) instruction and 45 to 50 minutes of English language arts

\(^{11}\) In a number of places, CCS assumes that sixty-one percent of its students will qualify for ELL. See Application, § G at 4.

\(^{12}\) In its responses to interview questions, CCS estimates that in Year 1 it will have approximately 81 ELL students. Interview at Question 45.
instruction. (Evaluation Rubric – Wendy S, § E.) The Application indicated that CCS ELL students will use CompassLearning ELL software 40 minutes per day, with additional pullout as needed. (Application, § Q at 12.) This falls far short of compliance. CCS knew about the OCR requirements prior to submitting its Application and still failed to comply, presumably because CCS would have to fundamentally alter its schedule to attain the requisite number of instructional minutes for its ELL students. (See Interview at Question 21.)

CCS also failed to identify goals pertaining to language acquisition for ELL students and demonstrated little knowledge of how ELL students progress to fluency. (See Application, § Q at 11-14; CSI Assessment at 8.) Though CCS demonstrated a somewhat better understanding of these concepts in the interview process, it still failed to address accessibility issues for Not English Proficient (“NEP”) students who struggle with the CompassLearning software. During the interview process, CCS representatives stated that NEP students would be able to understand the “non-linguistics supports” built into the CompassLearning software (pictures and illustrations), would have 24-hour access to the software, and would be given additional intervention and peer modeling. (Interview at Question 20). However, CCS offered no concrete examples of the interventions they intend to use or how such interventions will be implemented to help NEP students attain fluency. (Id.) Notwithstanding the gaps in its instructional model for ELL students, CCS’s stated goal was to have most, if not all, ELL students attaining fluent English proficiency in three years or less so as to phase out the need for ELD instruction by 4th grade. (Application, § Q at 12.) This goal ignores current research that students need an average of 5 to 7 years to meet English language proficiency and does not account for students who enter CCS in later grades. (Recommendation at § Q.)
Finally, CCS failed to address a number of inconsistencies with respect to its staffing intentions for ELL students. CCS acknowledged that ELL requirements necessitate the hiring of highly qualified bilingual staff and interpreters, but provided no plan on how to acquire instructors or interpreters with this expertise. Nor did it allocate sufficient funds for interpreter services. The Application appears to have budgeted for only two regular classroom teachers during the first year of operation. It is unclear how CCS expects these teachers to meet the needs of the school’s ELL population while fulfilling CCS’s additional expectations, which include, but are not limited to, lead teaching obligations for all students, ongoing participation in one or more leadership committees, and advisement of assigned students.

To make matters worse, CCS demonstrates a complete misunderstanding of the requirement for Highly Qualified teachers. Under No Child Left Behind (NCLB), all K-12 core content teachers must be Highly Qualified (HQ). To be considered Highly Qualified, a teacher must hold a degree, be fully licensed, and demonstrate subject matter competency in the content area that he/she is teaching. General education teachers who teach in charter schools that have been waived from licensing by the State Board do not need to meet the licensure requirement of the HQ requirements, but they must satisfy the degree and subject matter competency requirements. Special education teachers who teach in charter schools must meet state licensure requirements to be considered Highly Qualified. It is clear from the Opening Brief, that CCS incorrectly believes itself to be exempt from NCLB HQ requirements, which is why it was unable to identify the manner in which it will comply with HQ requirements when it hires its staff, including teachers who will provide ELL instruction.

13 In fact, CCS writes: “Upon authorization, we will modify our budget to reflect this expense.”
Instructional deficiencies of this magnitude for the target population are not acceptable at the time of application and are not in the best interests of the District, its students, or its community. Citing concerns that are similar to the District’s, CSI concluded that the Application only partially met its criteria for this content area. (CSI Assessment at 7.)

C. CCS Did Not Address the Accessibility and Adaptation of the Curriculum for Learners with Special Needs, Including Students with Disabilities.

CCS did not adequately address or plan for students with special needs, including students with disabilities. CCS appeared unfamiliar with the requirements of the Individuals with Disabilities in Education Act (“IDEA”) and made only a passing reference to Section 504 of the Rehabilitation Act. (Application, § Q at 6-9; CSI Assessment at 8.) For example, CCS appeared unaware that decisions about IDEA eligibility are made by a properly convened IEP Team in accordance with the procedural requirements of the IDEA. (Id.) Likewise, CCS could not identify interventions or accommodations for students with disabilities who are unable to access the school’s online or project-based curriculum. (Interview at Question 65.) Nor could CCS explain how it intends to meet the needs of students with disabilities with only one SPED-certified teacher to monitor and implement IEPs. (Id.) CCS failed to offer a reasonable explanation as to how its staff would serve students with disabilities in a day-to-day setting, particularly where students require small-group or pull-out instruction. (Id.) CCS did not indicate whether or how the online curriculum can be modified to address students with special needs and did not account for any costs associated with such modifications.14 These deficiencies demonstrate that, from both an instructional and financial standpoint, CCS is not prepared to

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14 CCS believes that the “highly engaging content” of CompassLearning, without more, will sufficiently advance the learning for students with special needs. (Interview at Question 65.) This statement reflects a misunderstanding of the needs of these students.
meet the needs of these students. CSI expressed similar concerns. (*CSI Assessment* at 8-9.) Therefore, approving CCS is not in the best interest of such students.

**D. CCS Board Members Lack the Expertise to Implement the Proposed Instructional Model with Fidelity.**

The District acknowledges that CCS’s mastery learning, project-based, blended learning teacher cooperative presents a unique and innovative approach to education. (*Recommendation* at § B.) However, the Act does not sanction innovation solely for the sake of being innovative. Successful charter school applicants are able to translate an innovative vision into the promise of a successful school through thoughtful implementation.

Here, CCS founding board members did not appear to have given sufficient thought to their implementation strategies, in large part because its members lack expertise in certain aspects of the proposed educational model. Though some members of the founding board profess experience in project-based learning, none appear to have experience with blended learning, much less experience with combining the two models with the target population and special needs students. (*Application* at § H; *Recommendation* at § H.) The founding board leaders are similarly short on experience in the areas of school finance, law, operations, and governance. (*Id.*) It appears that the lack of expertise among CCS’s leaders will get worse before it gets better because CCS did not identify sufficient or appropriate board training opportunities and did not outline a plan to recruit and retain qualified and diverse board members. (*Id.*) To the extent that CCS is able to recruit and retain qualified staff, CCS’s governance model is not designed to preserve any institutional knowledge when board members’ terms expire every two years. (*Id.; CSI Assessment* at 11.) Without the necessary expertise, CCS will not be able to implement its proposed educational model with fidelity.
E. CCS Did Not Adequately Describe the Implementation of its Proposed Governance Model.

CCS is distinguished by its cooperative style of governance. The District is not opposed to the concept of cooperative governance. However, because of its potential for complexity, it requires thoughtful implementation.

Here, the proposed school will be governed by a Board of Directors. (Application at § H.) According to CCS, the Board will have “central authority over all policy and operations with guaranteed protection of student voice.” (Application, § H at 1-2.) A Faculty Council acting in conjunction with a business manager and two lead teachers will answer to the Board and will be responsible for managing the day-to-day operations of the school. (Id.) The Faculty Council consists of seven different leadership committees. (Id.) Each committee must have one Board member representative and one staff member representative. (Id.) The business manager and the lead teachers are required to serve on virtually all of the leadership committees, and each school staff member is required to serve on at least one, but not more than two, leadership committees at any given time. (Id.) In addition to these various governing entities and individuals, the school will have a student advisory body and a parent advisory body, which will periodically meet with the Board and the Faculty Council, and, as applicable, will serve on the Board and the leadership committees. (Id.)

As an initial matter, CCS does not appear to have budgeted sufficient staff or instructional time to allow its teachers to teach their students, lead their school, and serve on the various leadership committees contemplated by its governance model.\(^ {15} \) By requiring Board members to serve on leadership committees, CCS also has undermined its intent to preserve the

\(^ {15} \) In addition to running the school and serving on leadership committees, CCS is expecting its teachers to perform the following ancillary responsibilities: professional development, committee work, student advisement for students spanning K-8\(^{th}\) grades, progress monitoring/data analysis, curriculum development, and lesson planning.
Board’s central authority over the school, and instead has inserted the Board into the day-to-day affairs of the school. However, of greater concern to the District is CCS’s inability to explain the resolution pathway of an issue using its proposed governance model, particularly where such issue implicates multiple leadership committees, student or staff confidentiality, and Board oversight. (Interview at Questions 39-42.) In short, CCS has not sufficiently strategized the coordinated decision-making of its tiered leadership. The resulting gaps in governance inevitably will have an adverse impact on the operation of the school and will not be in the best interests of the District, its students, and its community. CSI expressed similar reservations about CCS’s governance model, finding that CCS only partially met its application criteria.16

F. The Plan Is Not Economically Sound or Sustainable.

Even assuming, for the sake of argument, that CCS could overcome the concerns set forth above, as well as the other concerns outlined in the Resolution, CCS ultimately cannot surmount the significant deficiencies in its financial plan, which is neither economically sound nor sustainable.

A solid and predictable funded pupil count is the bedrock of any budget. CCS claims receipt of over 200 intent-to-enroll forms. (Application, § K at 5.) However, it is unclear whether these are attributable to families contacted during the current application cycle, as opposed to families contacted during CCS’s first application process almost a year ago. CCS did not identify the grade distribution of these forms, but CCS’s Application implied that it did not have sufficient enrollment commitments for grade 6. (Id.) Therefore, CCS’s plan to enroll 180 families for its first year appears overly optimistic, particularly with respect to students in grade 6.

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16 As CSI phrased it, there are “blurred lines between the roles of oversight and operations.”
Accepting, for argument purposes, the enrollment numbers detailed in the Application, CCS’s budget suffered from an over-reliance on soft revenues and understated costs. (See Cooperative Community Schools 6 Year Budget Proposal (hereinafter referred to as the “Budget”).) The most glaring of these is present in Year 1, when CCS will have an operating deficit in the approximate amount of $150,000.17 (See Budget at Year 1.) CCS proposed to balance this deficit with funds raised from crowdsourcing sites and private donors. (See Application, § G at 12, G 1-3.) Yet at the time of Application, CCS’s only financial guarantee was in the form of a letter for a private loan, contingent upon CCS’s execution of a loan agreement and receipt of a start-up grant. (See April 20, 2015 Letter from Andy Bardwell.) CSI also identified this budget deficit as a red flag in CCS’s application. (CSI Assessment at 10.) Unsurprisingly, CSI found that CCS did not meet its application criteria in this content area. (Id.)

Beyond this unreasonable operating deficit, the CCS budget contained a number of other inadequacies, including a lack of detail and alignment in the budget narrative and budget document and unrealistic costs projections, both of which further undermine CCS’s projected economic sustainability. For example, the budget document and the budget narrative did not align with regard to CCS’s food and supplies costs. (Compare Application, § G at 8 with Budget at Assumptions.) Additionally, though CCS stated that it intended to provide breakfast and lunch for students, it included unreasonably low meal costs in the narrative and no meal costs in its budget document. (See Application, § G at 8; Budget at Assumptions, Years 0-5.) To support these allocations during the Interview, CCS cited its plan to grow its own food in its community garden. (Recommendation at § G.) Accepting that CCS has the resources to successfully grow

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17 This figure assumes that CCS will receive a $215,000 start-up grant. Start-up grant funds are not to be used for facilities, staff salaries or benefits, capital expenditures or to subsidize any recurring operations costs or shortfalls. If CCS does not receive a start-up grant, then its funding picture is even bleaker.
enough food to adequately feed its students at least two meals a day in compliance with applicable law, bad weather and other agricultural anomalies are contingencies that CCS did not account for in its budget. Should the goal of growing its own food fall through altogether, the budget did not include a plan to work with an approved school food authority for these services, nor did it provide for commercial kitchen space needed to store and prepare such food.

In some cases, CCS’s budget simply failed to account for the known costs of its program. For example, CCS allocated negligible funds to professional development during Year 1.\textsuperscript{18} CCS’s budget also did not dedicate funds to transport students to and from the local recreation center for physical education. The budget further failed to provide for build-out expenses that CCS will incur to configure its facility. Though CCS claims that these amounts are reflected in its leasehold payments, the facility on which they are based is no longer available. \textit{(Interview at Question 53.)}

Finally, the budget did not allocate sufficient funds to fulfill CCS’s staffing needs. CCS intends to rely on classroom assistants for its instructional staffing plan, but the budget did not address how the school will meet requirements of having a sufficient number of highly qualified staff. \textit{(Budget at Staffing Plan.)} Moreover, as explained above, CCS has understaffed its programs by not providing for sufficient instructional employees to assist ELL students or additional teachers needed to oversee classrooms when lead teachers are pulled away to serve as administrators.\textsuperscript{19} Another example of defects in its staffing budget involves the cost of special education staff. CCS proposes to hire a licensed special education teacher as well as a .2 specialist to work on Individualized Education Programs (“IEP”). The budget does not reflect

\textsuperscript{18} It appears that the amounts allocated assume receipt of a start-up grant. \textit{See Budget at Year 1.}

\textsuperscript{19} The proposed governance model requires teachers to lead the school in conjunction with the business manager and the Faculty Council. \textit{See Application, § H.} This model fails to account for the back-up assistance needed in the classroom when teachers are called in to handle administrative duties.
this cost or the other long-term costs involved in providing educational services to students who have special needs. CSI had similar concerns about CCS’s budget and assessed this component of CCS’s application as High Risk. (CSI Assessment at 10.)

G. CSI’s Assessment of CCS as High Risk Is Further Evidence that Approval of the Application is Not in the Best Interests of the District, Its Students, or Its Community.

Throughout its Application, and again in its Opening Brief, CCS cites its one-time receipt of a charter school start-up grant as evidence that its Application should be approved. The Colorado Department of Education’s (“CDE”) Colorado Charter School Program grant process is not a proxy for the District’s charter application process. One has nothing to do with the other. The District’s application process is a comprehensive analysis of the Application using a standard rubric based on state and District requirements. CCS failed to meet the criteria in most of the District’s content areas. If the State Board seeks an analog for measuring the neutrality and legitimacy of the District’s conclusions, it need look no further than the CSI’s Assessment of the Application, which employed a rubric with content areas similar to the District’s in determining that CCS’s proposed school was High Risk. (See CSI Assessment.)

V. CONCLUSION

The District Board had twenty-two compelling, substantive reasons for denying a charter to CCS. Each of these reasons has ample support in the record on appeal. However, the ones outlined above represent significant deficiencies in CCS’s ability to carry out its instructional model. District students, many of whom are at-risk, cannot afford to languish in a program that lacks the educational and financial resources for successful implementation in the name of innovation. CCS has not provided sufficient evidence to carry its burden on appeal and prove
otherwise. As the elected representatives tasked with deciding the best interests of the District, its students, and its community, the District Board’s decision should be upheld.

WHEREFORE, the District respectfully requests that the State Board affirm the District Board’s decision to deny CCS’s charter application.

Dated this 19th day of August, 2015.

Respectfully submitted,

CAPLAN AND EARNEST LLC

By: ________________________________

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CERTIFICATE OF SERVICE

Pursuant to the Colorado State Board of Education 2008 Revised Administrative Policy on Charter School Appeals, Paragraph C. 2, on August 19, 2015, this Answer Brief has been filed electronically with the Colorado State Board of Education to the following email address along with three hard copies sent by U.S. Mail to the following address:

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Electronic copies were also sent to the following:

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s/ Susan Wilkerson
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