

ATTACHMENT C

FINDINGS OF FACT IN SUPPORT OF DENIAL OF THE RENEWAL CHARTER PETITION FOR TODAY'S FRESH START CHARTER SCHOOL – LOS ANGELES BY THE LOS ANGELES UNIFIED SCHOOL DISTRICT

BOARD OF EDUCATION REPORT
May 12, 2026

I. INTRODUCTION

On March 5, 2026, Today's Fresh Start Charter School-Los Angeles ("Charter School" or "Petitioners")¹ submitted a renewal petition ("Renewal Petition") to the Charter Schools Division ("CSD") of the Los Angeles Unified School District ("LAUSD" or "District"), seeking to renew its charter to serve up to 342 students in grades TK-8 for a five-year term, July 1, 2026, to June 30, 2031. (See Exhibit 1, Today's Fresh Start Charter School-Los Angeles Renewal Petition). Today's Fresh Start currently operates on a private site (non-District owned facility) located at 4476 Crenshaw Blvd., Los Angeles, CA, 90043 ("Vernon Site"), which is served by Board District 1 and Region South. Charter School's performance classification is designated as Middle performing.

On July 14, 2015, the Compton Unified School District Board of Trustees ("CUSD Board") approved Today's Fresh Start's new petition for a five-year term from July 1, 2015, through June 30, 2020, allowing it to locate and operate a charter school at the Vernon Site. The CUSD Board was expected to oversee Today's Fresh Start's operations at the Vernon Site. On December 20, 2017, the CUSD Board approved Today's Fresh Start's renewal for a five-year renewal term from July 1, 2018, to June 30, 2023. Pursuant to Education Code section 47607.4, all charter schools whose term expires on or between January 1, 2022, and June 30, 2025, inclusive, shall have their term extended by two years, and all charter schools whose term expires on or between January 1, 2024, and June 30, 2027, inclusive, shall have their term extended by one additional year. Thus, by operation of law, Today's Fresh Start's charter allowing it to operate at the Vernon Site expires on June 30, 2026.² The CUSD Board is currently the chartering authorizer of the sites located at the Compton Site and the Vernon Site under the name Today's Fresh Start-Compton.³

Pursuant to statute, a charter school that established one site outside the boundaries of the school district, but within the county in which that school district is located before January 1, 2020, may continue to operate that site until the charter school submits a request for the renewal of its charter petition. To continue operating the site, the charter school shall do either of the following:

- (i) First, before submitting the request for the renewal of the charter petition, obtain approval in writing from the school district where the site is operating; or
- (ii) Submit a request for the renewal of the charter petition pursuant to Section 47607 to the school district in which the charter school is located.

¹ Today's Fresh Start is a California nonprofit public benefit corporation that operates both Today's Fresh Start Charter School-Los Angeles and Today's Fresh Start-Compton.

² On March 10, 2026, CUSD Board approved Petitioners' renewal for a five-year term from July 1, 2026 to June 30, 2031 to operate at 4513 Compton Blvd., Compton, CA 90021 ("Compton Site").

³ The LAUSD Board is not currently, and has never been, the chartering authorizer of any charter school operated by Today's Fresh Start.

(Ed. Code, §47605(a)(5)(A).)

In this case, Today's Fresh Start seeks authorization by the LAUSD Board via this Renewal Petition application to continue operating at 4476 Crenshaw Blvd. pursuant to Education Code section 47605(a)(5)(A). Please note that Today's Fresh Start may be required to have one or more of its sites [Compton Site and Vernon Site] become a separately authorized charter school to comply with Education Code section 47605(a)(5)(A). (Ed. Code, § 47654.)

Pursuant to the Charter Schools Act (Ed. Code, § 47600 *et seq.*) and the adopted *LAUSD Policy and Procedures for Charter Schools* ("LAUSD policy" or "District policy"), LAUSD's Board of Education ("Board") has 90 days upon receipt of the renewal petition to either grant or deny the renewal petition unless an extension of an additional 30 days is mutually agreed upon by the parties. No later than 60 days following receipt of the renewal petition, the LAUSD Board must hold an initial public hearing to consider the level of support for the renewal petition by teachers employed by the District, other employees of the District, and parents. At the second public hearing, at which the Board will either grant or deny the charter, the petitioner shall have equivalent time and procedures to present evidence and testimony to respond to District staff's recommendation and findings. The LAUSD Board must publish all staff recommendations, including the recommended findings regarding the renewal petition, at least 15 days before the public hearing at which the LAUSD Board will either grant or deny the renewal petition.

The District evaluates renewal petitions in accordance with the standards and criteria specified in the Charter Schools Act. Based on a review of the Renewal Petition application including Today's Fresh Start's record of performance and other publicly available information, as described in greater detail below, District staff has determined that Charter School has not met the requirements set forth in Education Code sections 47605, 47607, 47607.2 and/or 47611.5, and therefore recommends denial of the renewal petition.

II. CRITERIA FOR RENEWAL AND GROUNDS FOR NONRENEWAL

Upon submission, District staff comprehensively reviews each renewal petition application to determine whether the charter school has met the requirements for renewal set forth in Education Code sections 47605, 47607, 47607.2 and 47611.5. The renewal criteria prescribed in Education Code sections 47607 and 47607.2 requires a three-pronged analysis:

Criterion 1:

The Charter Schools Act provides that renewals are governed by the standards and criteria described in Education Code section 47605 applicable to initial petitions. The first criterion considered in reviewing a renewal petition requires an analysis of the following:

- Whether the petition includes a sound educational program;
- Whether the petition contains a reasonably comprehensive description of the 15 elements required for petitions;
- Whether the petition contains an affirmation of each of the conditions described in Education

Code section 47605(e); and

- Whether the charter school is likely to successfully implement the program set forth in the petition. Education Code section 47607(b) provides that renewals are governed by the standards and criteria described in section 47605 applicable to initial petitions.

While Criterion 1 is similar to the criteria for a new petition, for renewal petitions, there is more information and data regarding past performance since the initial petition for establishment of the charter school was granted. Thus, soundness of the educational program and capacity for implementation are assessed through the past performance of the existing charter school as indicators of likely future performance, including any applicable benchmarks that have been established. The LAUSD Board will examine the charter school's record in four key areas of charter school performance:

- 1) Governance
- 2) Student Achievement and Educational Performance
- 3) Organizational Management, Programs and Operations
- 4) Fiscal Operations

As part of its analysis, the LAUSD Board is to assess the extent to which charter school governing board members and staff have successfully implemented the terms of their charter, addressed deficiencies, and demonstrated capacity to continue to do so in the future based on evidence of past performance.⁴

Criterion 2:

The LAUSD Board is required to consider the charter school's performance on the California School Dashboard accountability indicators. Education Code sections 47607 and 47607.2 prescribe three-tiers of performance classification in which a charter school falls within one of the following categories - "high," "middle," or "low" performing. The state will publish an annual list of charter schools and their performance classification.

The three-tier classification considers a charter school's performance on the California School Dashboard accountability indicators, with an emphasis on the measurements of academic performance. "Measurements of academic performance" refers to the state indicators included on the California School Dashboard that are based on statewide assessments in the California Assessment of Student Performance and Progress System (CAASPP), or any successor system, English Learner Progress Indicator (ELPI), or any successor system, and the College/Career Indicator (CCI). A charter school submitting a renewal petition should include in its application all evidence and data related to the charter school's performance on the California School Dashboard.

⁴ See LAUSD policy, pp. 28-29.

Middle Performing Charter Schools

For all charter schools that do not meet the High performing or Low performing criteria, the LAUSD Board shall consider the charter school under Middle performing criteria. (Ed. Code, § 47607.2(b).) Pursuant to Education Code section 47607.2(b), the LAUSD Board shall consider the following:

- (1) The schoolwide performance and performance of all student groups of pupils served by the charter school on both the state and local indicators on the California School Dashboard;
- (2) The LAUSD Board shall provide greater weight to the performance on measurements of academic performance on the California School Dashboard;

The LAUSD Board may deny a renewal of a Middle performing charter school pursuant to Education Code section 47607.2(b) upon making each of the following written factual findings:

- (1) The charter school has failed to meet or make sufficient progress toward meeting standards that provide a benefit to pupils of the school;
- (2) The closure of the charter school is in the best interest of the pupils; and
- (3) The decision provided greater weight to the performance on the measurements of academic performance.

When determining whether to deny a renewal petition under prong 1 or 2, LAUSD will consider the full oversight record of the charter school, providing greater weight to performance on the measurements of academic performance. This consideration will include a comparison to Resident Schools' performance on the measurements of academic performance (e.g., reclassification rates, Long-Term English Learner (LTEL) rates, and percentage of students Met or Exceeded Standards as measured on the CAASPP as compared to the state averages, California School Dashboard data, four-year cohort graduation rates). A list of Resident Schools is generated, based on students' addresses as reported in CALPADS. For schools within an LAUSD "Zone of Choice," all the schools that the students could have potentially attended will be used to calculate a Resident Schools Median (RSM).

For a charter renewed as a Middle performing charter school, the LAUSD Board shall grant a renewal for a period of five years. (Ed. Code, § 47607.2(b).)⁵

Criterion 3:

Notwithstanding Criterion 1 and 2, the LAUSD Board will also consider whether the charter school's enrollment or dismissal practices are discriminatory as grounds for nonrenewal. (Ed. Code, § 47607(e).) Additionally, the LAUSD Board shall consider whether the charter school has substantial fiscal or governance factors as grounds for nonrenewal. (*Id.*)

⁵ See LAUSD policy, pp. 35-37.

Specifically, the LAUSD Board may deny renewal of any charter petition, regardless of whether the charter school satisfies the High, Middle, or Low performing criteria, upon a finding that either:

- (1) The charter school is demonstrably unlikely to successfully implement the program set forth in the renewal petition due to either:
 - (a) Substantial fiscal factors, or
 - (b) Substantial governance factors.

Pursuant to the District Policy, substantial fiscal factors may include, but are not limited to, issues related to the charter school's fiscal solvency, mismanagement of funds, cash flow concerns, or outstanding financial liabilities owed to the District and/or others (e.g., contractual obligations, judgments/settlements, unpaid bills or debts, fee-for-service arrangements, facilities related costs, Prop. 39 over-allocated space reimbursements, etc.). Substantial governance factors may include, but are not limited to, issues related to the retention of faculty (such as school leadership and teachers) which rise to the level of disruption of delivery of educational programs; conflicts of interest; or, violations of the Brown Act or California Public Records Act.

- (2) The charter school is not serving the pupils who wish to attend.

Upon a finding that the charter school is not serving all pupils who wish to attend, LAUSD must identify evidence supporting this finding, including aggregate data reflecting pupil enrollment patterns at the charter school. (Ed. Code, § 47607(d).)⁶

Prior to a nonrenewal determination pursuant to number 1 or 2 noted above, LAUSD shall provide the charter school with at least 30 days' notice of the alleged violation and provide the charter school with a reasonable opportunity to cure the violation, including providing an opportunity for the charter school to present a proposed corrective plan. (Ed. Code, § 47607(e).) After providing notice of the alleged violation and reasonable opportunity to cure the violation, the LAUSD Board may deny a renewal petition if it finds that either:

- 1) The corrective action proposed by the charter school has been unsuccessful, or
- 2) The violations are sufficiently severe and pervasive as to render a corrective action plan unviable.

III. FINDINGS OF FACT IN SUPPORT OF DENIAL OF CHARTER RENEWAL

As noted above, the LAUSD Board is not, and has never been, the chartering authorizer of any charter school operated by Today's Fresh Start. As such, in effort to gain further clarity of Charter School's educational or instructional program (including student academic performance), operations, governance, and fiscal management, Staff requested that CUSD (current chartering authorizer) provide Today's Fresh Start-Compton's full oversight file to the District for review and assessment. However, to date, the District has not obtained the sought oversight file from

⁶ See LAUSD policy, pp. 37-38.

Today's Fresh Start-Compton's current chartering authorizer.

Notwithstanding the above, based on a review of Charter School's Renewal Petition application including Today's Fresh Start's record of performance and other publicly available information pertaining to Petitioners' past history of involvement in charter schools or other education agencies (public or private), District staff recommends that the LAUSD Board **deny** the Renewal Petition and adopt these *Findings of Fact In Support of Denial of the Renewal Charter Petition for Today's Fresh Start Charter School – Los Angeles* based on the following ground(s):

- Petitioners are demonstrably unlikely to successfully implement the program set forth in the Renewal Petition. (Ed. Code § 47605(c)(2).) (Criterion 1); and

The Renewal Petition does not contain reasonably comprehensive descriptions of all required elements. (Ed. Code, § 47605(c)(5).) (Criterion 1)

A. Petitioners are demonstrably unlikely to successfully implement the program set forth in the Renewal Petition (Ed. Code, § 47605(c)(2)), as indicated by the following findings:

In evaluating whether a petitioner is demonstrably unlikely to successfully implement⁷ the program set forth in the renewal petition, the LAUSD Board assesses a variety of factors, including but not limited to, petitioner's past history of involvement in charter schools or other education agencies (public or private), as one the LAUSD Board would regard as unsuccessful; and the financial and operational plan for the charter school.⁸ Based on the grounds and analyses set forth below, the Petitioners are demonstrably unlikely to successfully implement the program set forth in the Renewal Petition. (Ed. Code, § 47605(c)(2).)

1. Petitioners Have a Past History of Unsuccessfully Operating a Charter School and a State-Funded Preschool

In reviewing the past history of a charter operator, it is appropriate to review the history of Charter School itself as well as the record of performance of Today's Fresh Start that will operate Charter School: Petitioners operated a charter school that has been revoked by a chartering authority; has a pattern and history of notices to cure, notices of violation, or corrective actions from a chartering authority or a government agency; and operated an educational entity (public or private) that has been cited by a government agency and/or closed down. This past history raises questions whether Petitioners can successfully implement the program set forth in the Renewal Petition, including the areas of curriculum, instruction, assessment, governance and/or business management.

⁷ The policy for "demonstrably unlikely to successfully implement the program" includes factors and guidance promulgated by the State Board of Education. See Title 5 California Code of Regulations, section 11967.5.1.

⁸ See LAUSD policy, pgs. 12-13.

a. Questionable Operations of Golden Day Schools, Inc.

The binding appellate case entitled *Golden Day Schools, Inc. v. Office of Administrative Hearings* (2017) 8 Cal.App.5th 1012 (the “Appeal”), outlines the following facts and legal conclusions below:

Golden Day Schools, Inc., is a nonprofit corporation (“Golden Day”) founded by Clark Parker that provided children from low-income families with daycare, education, and social development since 1968. At the time, the sites were owned by Clark Parker and his wife, Jeanette Parker (one of the Petitioners in the subject Renewal Petition). The Parkers leased certain sites to Golden Day, which in turn subleased four classrooms to Today's Fresh Start, operated by Jeanette Parker. At that time, both Parkers were members of Golden Day's board of directors. (*Id.* at 1018.)

Beginning around 1971, Golden Day began contracting with the CDE to receive funds necessary to provide childcare services to eligible children in areas of South Central Los Angeles. The two contracts at issue during that time involved the fiscal/school years of 2006-2007 and 2007-2008. (*Id.*) Under those contracts, the CDE advanced to Golden Day \$4,324,098 for fiscal year 2006-2007 and \$4,519,980 for fiscal year 2007-2008. Golden Day agreed to abide by the “Funding Terms and Conditions” incorporated into the contracts, which, in turn, incorporated applicable statutory and regulatory provisions. (*Id.*)

In 2008, the CDE conducted a performance review of Golden Day, building upon Golden Day's audits, for the purpose of determining whether Golden Day operated the child care and development programs in compliance with applicable laws, regulations, and agreement terms and conditions for the period July 1, 2006 through June 30, 2008. (*Id.* at 1018-19.) The review was prompted by the CDE's concerns over the validity of parent employment records necessary to establish eligibility for funding. The review consisted of the CDE's representatives visiting Golden Day's sites, interviewing employees and staff, and examining nearly all of Golden Day's business records, including inventory, payroll, invoices, receipts, checks, student sign in/out sheets, time cards and journal entries. (*Id.* at 1019.)

At the end of the process, the CDE notified Golden Day of its conclusion that “Golden Day failed to meet the minimum contractual requirements for compliance, did not have effective internal controls over its fiscal and program operations, and charged a significant amount of non-reimbursable and unallowable expenditures to the child development program.” (*Id.* at 1019.) The CDE made nine specific findings regarding various issues and sought to recoup \$3,257,732 for the period between July 1, 2006, and June 30, 2008. (*Id.*)

The CDE determined that a significant proportion of the funds it had provided to Golden Day were not being spent on reasonable expenses for eligible children and sought recoupment of those amounts.

Golden Day appealed the CDE's determination through several administrative

proceedings before the Office of Administrative Hearings and a writ action, all culminating in the Appeal.

The Court concluded in the Appeal that substantial evidence supported the findings of the administrative law judge (ALJ) and the trial court that the CDE was allowed to recoup (i) costs for commingling eligible and noneligible students, (ii) certain payroll costs for employees who also worked at a charter school on some of the same sites, and (iii) various nonreimbursable costs. (*Id.* at 1017.)

As a significant finding established by the Court, Golden Day wrongfully sought reimbursement from the CDE for 48 employees that were actually employees of Today's Fresh Start. In relation to these findings, the Court specifically stated that: "As a result, the Department 'determined that \$930,657 in payroll costs relating to Today's Fresh Start were inappropriately charged to the child development program for the period July 1, 2006 through June 30, 2008.'" (*Id.* at 1028.)

The above findings and Court ruling present very serious concerns regarding the Parkers' operations of Golden Day and call into question whether Petitioners, inclusive of Jeanette Parker, would appropriately expend public/educational/charitable funds for Charter School students. Accordingly, this past history raises questions whether Petitioners can successfully implement the program set forth in the Renewal Petition, including the areas of curriculum, instruction, assessment, governance and/or business management.

The LAUSD Board of Education Report 027-15/16 (*See* Exhibit 2, LAUSD Denial of New Petition Today's for Fresh Start Adams Hyde Park),⁹ and the attached Exhibits, outline other facts regarding Golden Day's operations and grounds for denial which are hereby incorporated into this denial finding by this reference.

b. Petitioners' Previous Charter Under LACOE Board's Authorization Was Revoked

The Los Angeles County Office of Education (LACOE) Board authorized a Today's Fresh Start charter school in 2003, renewed that charter school in 2005, and then, revoked that charter school in 2007. The LACOE Board revoked Today's Fresh Start's charter school based on several violations discussed in California Supreme Court's decision, *Today's Fresh Start, Inc. v. Los Angeles County Office of Education* (2013) 57 Cal.4th 197. The California Supreme Court upheld the 2007 LACOE Board revocation. The violations which led to the revocation by the LACOE Board included failing to properly administer state testing; violation of governance requirements applicable to charter schools; failure to meet pupil outcomes; and violations of law. (*Id.* at 208-10.) The LACOE Board also addressed concerns that Today's Fresh Start's board members were not protecting public funds and were using their positions improperly for their own personal enrichment. (*Id.* at 208.) Thus, Today Fresh Start's prior revocation by the LACOE Board illustrates the organization's unsuccessful history.

⁹ On September 1, 2015, the LAUSD Board of Education denied Today's Fresh Start's petition to establish a new charter school, named Today's Fresh Start Adams Hyde Park. Exhibit 2 presents the denial findings that the LAUSD Board of Education adopted in that matter pursuant to applicable requirements.

The LAUSD Board of Education Report 027-15/16 (*See Exhibit 2, LAUSD Denial of New Petition Today's for Fresh Start Adams Hyde Park*), and the attached Exhibits, detail the facts regarding the LACOE Board's revocation proceedings and grounds for denial which are hereby incorporated into this denial finding by this reference.

c. Today's Fresh Start Inglewood's Nonrenewal

In 2019, Today's Fresh Start Inglewood submitted its renewal petition to Inglewood Unified School District ("Inglewood USD") for consideration. After Inglewood USD denied Today's Fresh Start Inglewood's charter renewal petition, Today's Fresh Start Inglewood's appealed that denial to the LACOE Board for consideration. The LACOE Board denied the renewal petition on appeal around January 2020.

Today's Fresh Start Inglewood appealed to the State Board of Education (SBE). On or around July 2020, the SBE unanimously denied Today's Fresh Start Inglewood's renewal petition because, among other reasons, the organization's county charter was revoked in 2007 and its operational history exhibited "ambiguity, self-dealings, and a lack of transparency." The lacking merits of Today's Fresh Start Inglewood's renewal petition was established by three separate administrative bodies. (*See Exhibit 3, SBE Denial of Renewal Petition for Today's Fresh Start Inglewood*)

d. Two Current Today's Fresh Start Board Members Governed the Organization During Questionable Past History

Two of the four current Today's Fresh Start Board members served on that governing body for an extended period particularly during some of the events and/or questionable history noted in sections a-c above. (*See Exhibit 4, Today's Fresh Start Board Member Resumes.*) These Today's Fresh Start governing board members may not possess the capacity to govern a successful charter school in the future based on evidence of past performance of the organization.

Therefore, as reflected in **sections a-d** above, the Petitioners are demonstrably unlikely to successfully implement the program set forth in the Renewal Petition. (Ed. Code, § 47605(c)(2).)

2. Charter School's Historical Under-Enrollment and Declining Student Enrollment Trend

Today's Fresh Start-Compton's historical enrollment data indicates that the charter school has been consistently under-enrolled, in comparison with the projected enrollment outlined in its operative charter. Additionally, Today's Fresh Start-Compton has experienced a steady decline in enrollment since Fiscal Year 2019-2020.

The table below summarizes Today’s Fresh Start-Compton’s historical enrollment¹⁰ and projected enrollment provided in its operative charter since Fiscal Year 2018-2019, demonstrating that the charter school has been under-enrolled for six of the eight fiscal years. This reduced enrollment directly decreases revenue, as the Local Control Funding Formula (“LCFF”) funding is directly tied to enrollment and Average Daily Attendance (“ADA”). As explained further in **Section 3** below, while the charter school projects a significant enrollment increase, Petitioners do not present a reasonable and realistic financial plan given that Today’s Fresh Start-Compton has shown a consistent pattern of under-enrollment and a multi-year decline in student numbers.

Historical Enrollment Trend Table

Grade Level	2018-2019	2019-2020	2020-2021	2021-2022	2022-2023	2023-2024	2024-2025	2025-2026
TK ¹	N/A	N/A	N/A	N/A	N/A	7	4	0 ²
K	73	71	48	51	36	33	24	32 ²
1	58	86	58	43	52	34	40	29
2	74	73	82	54	41	47	38	34
3	75	79	76	68	41	40	50	34
4	75	81	88	67	64	36	39	54
5	80	88	82	70	53	58	39	35
6	64	81	68	62	57	51	48	31
7	57	72	87	53	57	53	49	51
8	38	56	72	69	43	50	43	45
TOTAL	594	687	661	537	444	409	374	345
Increase/ (Decrease) in Enrollment from Prior Year	N/A	93	(26)	(124)	(93)	(35)	(35)	(29)
Enrollment Growth (%)	N/A	15.7%	(3.8%)	(18.8%)	(17.3%)	(7.9%)	(8.6%)	(7.8%)
Projected Enrollment in the Operative Charter	715	715	715	715	715	715	715	715
Under-Enrollment	(121)	(28)	(54)	(178)	(271)	(306)	(341)	(370)
Under-Enrollment %	(16.9%)	(3.9%)	(7.6%)	(24.9%)	(37.9%)	(42.8%)	(47.7%)	(51.7%)
¹ Prior to FY 2023-2024, TK (Traditional Kindergarten) and K (Kindergarten) counts might have been reported together. Therefore, the K counts (if applicable) may include the TK counts for the school years prior to 2023-2024. ² Charter School’s budget submitted with the renewal petition to LAUSD did not provide a breakdown for TK and K enrollment data.								

¹⁰ Sources: Enrollment data for all school years presented in the table were obtained from the CDE’s DataQuest webpage (<https://statics.teams.cdn.office.net/evergreen-assets/safelinks/2/atp-safelinks.html>), with the exception of the 2025-2026 school year, for which the enrollment data were obtained from the budget submitted with the renewal petition to LAUSD.

3. Unreliable and Unrealistic Petition Budget and Cash Flow Projections

Petitioners have presented an unreasonable and unrealistic financial plan in support of Today’s Fresh Start Charter School-Los Angeles’ Renewal Petition application.

- **Unrealistic Enrollment Projections:**

The budget submitted with the Renewal Petition relies on overly optimistic enrollment assumptions and revenue projections that are not supported by the charter school’s historical performance trends. Despite a consistent pattern of under-enrollment and a multi-year decline in student numbers (as described in **Section 2** above), Charter School projects a significant enrollment increase. Petitioners did not provide supporting documentation detailing how Charter School intends to achieve the increased enrollment projections for the proposed charter term, which directly drive the projected revenue increases. This raises significant concerns regarding the reasonableness and reliability of Charter School’s enrollment and revenue assumptions, which may result in overstated revenues, potential budget shortfalls, and fiscal instability during the proposed charter term.

Additionally, for purposes of comparison with the charter school’s historical enrollment data, District staff have summarized and combined the enrollment projections for both the Compton Site and Vernon Site below, which is based on the renewal petitions submitted to CUSD and LAUSD, respectively, for which a site-level breakdown is not available.

Table 1: Renewal Enrollment Projections Submitted to CUSD

Grade	Year 1 2026-27	Year 2 2027-28	Year 3 2028-29	Year 4 2029-30	Year 5 2030-31
TK/K	58	20	20	20	20
1	20	60	20	20	20
2	20	20	60	20	20
3	20	20	20	60	20
4	20	20	20	20	60
5	18	20	20	20	20
6	16	16	20	20	20
7	16	16	16	20	20
8	16	16	16	16	20
Totals	204	208	212	216	220

Table 2: Renewal Enrollment Projections Submitted to LAUSD

Grade	Year 1 2026-27	Year 2 2027-28	Year 3 2028-29	Year 4 2029-30	Year 5 2030-31
TK/K	40	50	50	50	60
1	30	40	40	40	40
2	25	30	40	40	40
3	33	25	30	40	40
4	32	33	25	30	40
5	52	32	33	25	30
6	33	52	32	33	25
7	25	33	52	32	33
8	47	25	33	52	32
Totals	317	320	335	342	340

Table 3: Combined Renewal Projections Submitted to CUSD and LAUSD (Table 1 and 2) and 2025-2026 Enrollment Data

Grade	2025-2026 Enrollment ¹¹	Year 1 2026-27	Year 2 2027-28	Year 3 2028-29	Year 4 2029-30	Year 5 2030-31
TK/K	32	98	70	70	70	80
1	29	50	100	60	60	60
2	34	45	50	100	60	60
3	34	53	45	50	100	60
4	54	52	53	45	50	100
5	35	70	52	53	45	50
6	31	49	68	52	53	45
7	51	41	49	68	52	53
8	45	63	41	49	68	52
Combined Totals	345	521	528	547	558	560
Increase in Enrollment from Prior Year	N/A	176	7	19	11	2
Enrollment Growth (%)	N/A	51.0%	1.3%	3.6%	2.0%	0.4%

Based on the combined projected enrollment of 521 to 560 students for the charter school's proposed renewal term compared to the charter school's

¹¹ The 2025-2026 enrollment data were included in the budget submitted with the Renewal Petition to LAUSD without the site-level breakdown.

historical enrollment trends noted above, Petitioners' projected enrollment appears unreasonable and overly optimistic. Over the most current five (5) years, Today's Fresh Start-Compton's student enrollment declined by 192 students (or 35.8%), from 537 in Fiscal Year 2021-2022 to 345 in Fiscal Year 2025-2026 for both the Compton site and Vernon site. Despite this trend, Today's Fresh Start Charter School-Los Angeles projects 521 students for Fiscal Year 2026-2027, an increase of 176 students (or 51.0%), without providing supporting documentation or underlying assumptions explaining how this growth will be achieved. The foregoing raises concerns regarding the reasonableness of a calculated budget for the renewal charter term.

o **Incorrect Fund Balances for Fiscal Years 2029-2030 and 2030-2031**

Petitioners' budget contains apparent errors or inconsistencies between the beginning fund balance for Fiscal Year 2029–2030 and the ending fund balance for Fiscal Year 2028–2029. As a result, the ending net assets for Fiscal Years 2029–2030 and 2030–2031 are understated by approximately \$1.9 million. These inconsistencies materially affect the projected fund balances for these two school years, and thus, raise concerns about the reliability of Petitioners' budget projections.

B. The Renewal Petition does not contain reasonably comprehensive descriptions of all required elements. (Ed. Code, § 47605 (c)(5).) (Criterion 1)

A renewal petition must contain a reasonably comprehensive description of each of the 15 elements required by Education Code section 47605(c)(5). Reasonably comprehensive descriptions are expected to be substantive, address all aspects of the elements, and be specific to the renewal petition being proposed. The Renewal Petition does not contain reasonably comprehensive descriptions in compliance with the law. (*See Exhibit 1, Today's Fresh Start Charter Renewal Petition.*)

1. Employee Qualifications (Element 5)

Petitioners' budget includes an Executive Assistant (EA) at 0.5 Full Time Equivalent (FTE) with a salary of \$103,905, equivalent to \$207,810 on a full-time (1.0 FTE) basis. This EA position is the second highest paid employee based on Charter School's budget assumptions; however, the EA position does not appear to be included in the charter petition staffing plan, inclusive of job description and minimum and desirable qualifications. Petitioners are asked to identify key staff positions and detail the specific, high-level qualifications required for those roles to ensure effective leadership and instruction, and the omission of this information raises concerns about the comprehensiveness of the petition, and whether the expenditures for the position are justified.

2. Suspension and Expulsion Procedures (Element 10)

The Renewal Petition does not sufficiently describe the suspension and expulsion appeals process to ensure a consistent impartial process is in place. Consistent with applicable authorities and requirements, charter schools are expected to establish and implement policies and procedures to ensure full compliance with federal and state laws and regulations regarding the discipline of students. Here, the Renewal Petition fails to include necessary provisions outlining how it plans to provide due process rights regarding suspensions and expulsions that specifically includes a student's right to appeal. Thus, the Renewal Petition fails to examine the procedures a charter school must follow when suspending or expelling a student under applicable requirements.

IV. RECOMMENDATION

Based on the foregoing, District staff recommends that the LAUSD Board deny Charter School's Renewal Petition. The recommendation for denial is based on findings that Petitioners are demonstrably unlikely to successfully implement the educational program set forth in the Renewal Petition. Additionally, the recommendation for denial is based on District staff findings that the Renewal Petition does not contain reasonably comprehensive descriptions of all fifteen required elements.

In order to deny the Renewal Petition on the grounds set forth above, the LAUSD Board must make written findings setting forth specific facts to support the denial of the Renewal Petition. (Ed. Code § 47605(c).) Should the LAUSD Board decide to deny renewal of the Charter School's charter, District staff recommends that the Board adopt these *Findings of Fact in Support of Denial of the Renewal Charter Petition for Today's Fresh Start Charter School – Los Angeles* as the Board's written findings of fact in support of the denial.

Exhibits are available for perusal at the following link:

https://drive.google.com/drive/folders/1lcORn8tdGpeWnoPhEBztGBzdK_jlVS0Q?usp=sharing