

**Policy 3300, Charter School
Comment Log**

November 15, 2019 – January 14, 2020

Action

A/S Comment was accepted and supports the proposed policy.

A/C Comment was accepted and resulted in changes to the proposed policy.

N Comment was not accepted.

Date	Commenter	Comments	Action	Rationale
§126-79-1. General.				
11/15/19	John Smith	Why try something in a rural state like West Virginia when charter schools are corrupt and closing down all over the country. Have you all been in your ivory tower's too long	N	Response 1: W. Va. Code Chapter 18, Article 5G authorizes the establishment of charter public schools (or charter schools) in West Virginia. The West Virginia Board of Education is establishing Policy 3300 to implement the law.
11/15/19	Brian Allen	I find this situation reprehensible. I am a taxpaying member of West Virginia, and I do not appreciate my tax dollars getting funneled from public schools to help subsidize this garbage proposal. Charter schools are a joke. There is no oversight. There are no regulations. Any bum with a fraudulent resume' can apply to teach any class. This is just another chance for a joke Education Secretary to swing her money around. I hope this program crashes and burns and all the morons that enroll their children into it suffer because of it.	N N	See Response 1. Response 2: Regarding personnel decisions at charter schools, Policy 3300 requires charter schools to establish personnel qualifications, which may not be less than the qualifications required of alternatively certified teachers pursuant to W.Va. Code §18A-3-1, et seq.
11/15/19	Eric Engle	Charter schools simply take financial and other resources from our public schools. These charter school "teachers" don't even have to have high school diplomas or college degrees of any kind or be certified in any capacity to teach. This charter school movement is about indoctrination and an anti-public school zealotry that has developed in	N N	Response 3: Policy 3300 establishes per-pupil funding for charter public schools in West Virginia. Pursuant to W. Va. Code §18-5G-1, et. seq., charter schools shall receive 90% of total basic foundation allowance, including Step 4 (transportation) and Step 6a (Current

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		states across the nation and has now come to West Virginia. The state legislature and state Board of Education have done an enormous disservice to our students by allowing these “schools.”		Expenses) funding. However, Policy 3300 contains provisions that modify Step 4 and Step 6a calculations under the Public School Support Plan (PSSP) to provide county boards of education some additional funding in these areas. The per-pupil funding established in Policy 3300 is intended to be the primary funding source for the annual operations of charter schools. Funding for facility construction is not part of the total basic foundation allowance. Policy 3300 prohibits charter public schools from charging tuition to raise additional funds. Finally, charter schools are only eligible to receive funding from excess levies if it is explicitly stated that the excess levy will fund charter schools. See Response 2.
11/15/19	Mary Deskins	I am opposed to charter schools. If WV must have them, the school must have a way to ensure they will stay open the whole school year, use only teachers with at least a bachelor's degree, provide teachers will pay equal to at least the same as the public school teachers in that zip code, institutionalize an audit system that confirms the number of students actually enrolled and attending, be required to have buildings that meet the same safety and comfort standard as the public schools in that zip code, and not allow for-profit businesses to be hired or used for that school.	A/S	Policy 3300 provides county boards of education, as authorizers, with substantial authority and responsibility to monitor and oversee the financial practices of charter schools. County boards of education may deny charter applications that do not demonstrate sustainability through their business plan and may take necessary corrective action throughout the contract if financial sustainability is at risk. Furthermore, authorizers and charter schools are required to develop a closure plan in the charter contract to provide an orderly

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				<p>transition for students and parents.</p>
			N	<p>See Response 2.</p>
			A/S	<p>Pursuant to W. Va. Code §18-5G-3(c)(8), Policy 3300 requires charter schools use the same electronic system as other public schools to track student enrollment.</p>
			A/C	<p>Additionally, Policy 3300 was updated to acknowledge that the WVDE will provide a standard student enrollment application form for use by charter schools.</p>
			A/S	<p>Pursuant to W. Va. Code §18-5G-3(c)(13), Policy 3300 requires charter schools to follow the same building codes and regulations as non-charter public schools.</p>
			N	<p>Response 4: Policy 3300 establishes additional evaluation criteria and reporting requirements for charter schools using/planning to education service providers (ESP), including required disclosure of ESP investors and financial entanglements between the ESP and the charter school governing board. The use of ESPs is explicitly referenced in W. Va. Code §18-5G-1, et. seq. The additional provisions in Policy 3300 are designed to help authorizers ensure that contracting with ESPs is an effective use of public money to improve student outcomes.</p>

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11/16/19	Not Provided	<p>Charter schools will divide an opportunity for students and families who are wanting to learn and receive a quality education without the constant disruption, fear, and trauma caused by undisciplined children who are not removed from the general education environment. Students and teachers have a right to safe classrooms with a culture of learning. Public schools have failed and continue to fail in this area. They continue to build an environment that is volatile and often violent.</p> <p>There is no Human Resource structure in public education in WV and staff are subjected to abuse and mistreatment by administrators. This could be easily resolved with an oversight committee as charter schools will have.</p> <p>While I do believe that a person should have a background in child development, ethics, and methods of learning, I believe that a solid pay structure and rigorous oversight could attract excellent employees into education roles. I'd like to see more about the requirements for teaching staff.</p>	N	<p>Response 5: The West Virginia Board of Education is establishing Policy 3300 to implement W. Va. Code §18-5G-1, et. seq. This policy does not address accountability for or structure of non-charter public schools.</p> <p>See Response 2.</p>
11/16/19	Philip Ward	<p>Charter schools should be viewed as another way of providing an excellent education, not an enemy of the taxpayers and students. Everything possible should be done to make WV students more competitive in their careers.</p>	A/S	
11/16/19	Randy Berisford	<p>I feel that Charter schools would be a major improvement by creating competition. Where there is competition everyone strives to be better. When football teams play tough teams the strive to become better than their competitors. Our</p>	A/S	

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		students are suffering due to complacency.		
11/16/19	Nancy Sullivan	As a citizen & a retired educator I am strongly opposed to the introduction of charter schools in West Virginia.	N	See Response 1.
11/16/19	Sam Elswick	As a former public educator & currently a parent to a 3yr old with Autism I believe the policy laid out for Charter schools is a disservice to students, teachers & parents. My biggest concern is that there are no minimum requirements for teachers. I also believe that instead of throwing more schools into the state, we should focus on bettering the schools we already have. Instead of consolidating our public schools, break them up & provide more funding.	N N	See Response 1. See Response 2.
11/17/19	Ashley Prichard	No to charter schools	N	See Response 1.
11/17/19	Eve Marcum-Atkinson	I do not want my education tax dollars funding private charter schools. I see this in direct opposition to the purpose of free (aka paid by my tax dollars) public education. Let's improve our public education system instead of selling it out. I was ALL kids to have an equal opportunity opportunity for a good education.	N	See Response 1.
11/17/19	Selby McClung	Charter schools will only hurt WV students. Teachers and educators have shown overwhelming opposition.... so much so that even putting effort into submitting this form seems futile. Please prevent corporate profit from the people and students of West Virginia.	N	See Response 1. See Response 4.
11/17/19	Kim Kelly	I am a parent, and I do not want funds for charter schools taken from my daughter's public school.	N	See Response 1.
11/17/19	Rondalyn Whitney	My older son was in a Charter in another state. We had to pull him out. It was a disaster. Its good for kids who blend in but doors are closed to any unique needs. BTW that child is now grown.	N	Policy 3300 provides county boards of education with significant authority to oversee charter schools and take corrective action if charter schools in West

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		Graduated from top liberal arts college in US, perfect score on SAT. Charters syphon money from Public and no oversight...we cannot afford this in WV		Virginia are not meeting the needs of diverse learners.
11/18/19	Lisa Weihman	I do not want money that should be going to our public schools used to charter schools. I am sickened that there are legislators in Charleston buying up property and scheming to turn charter schools into private slush funds. The graft and unethical behavior of our legislators in passing this mess is evident to many of us.	N	See Response 1.
11/18/19	Jessie Maynard	I adamantly oppose the state funding charter schools in any way. Or public schools need all of their funding and more. A big reason or students and educational system are failing are the lack of funds to pay teachers for all of their hard work and appropriate, up to date educational supplies and materials. Allowing charter schools to take funding away from the public schools will only hurt or most disadvantaged youth, of which WV has a disproportionately high number of.	N	See Responses 1 and 3.
11/19/19	Tim Reinard	State policy does not mention: (5.4.b.1.b.4(b) as an independent facility should they have to address the below items) Radon testing in first year and at 5 year interval there after Asbestos testing prior to occupancy Lead paint certification prior to occupancy Do charter schools have to have a 10 year facilities plan? Maybe after the first year! Does school have to have safety and security plan like we do? Are doors locked / controlled in some manner to keep people from walking in?	A/S	Section 4.3.I in Policy 3300 requires charter schools to describe how their facilities plan will meet the same building safety and security standards as are required of non-charter public schools. Since charter contracts last 5 years. The facilities plan must be for the length of the contract.

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11/19/19	Joyce Tedder	I do not want Charter Schools in our State. I think the Community has made this plain to our lawmakers, but they do not listen to the people they serve. I can only hope our Educational leaders will listen.	N	See Response 1.
11/19/19	Angela Nesselrotte	I have 2 children in a WV public high school and i am for charter schools, public and homeschools dont work for everyone and we need more school choices!!	A/S N	See Response 5.
11/20/19	Lisa Syner	I do not feel that Charter Schools are going to fix or help the problems in our Public Schools. I think your time and effort would be better spent talking with teachers about issues we are facing and listening to our suggestions on how to address them. Creating a new type of school is not the answer.	N	See Response 1.
11/20/19	Dustin Vaughan	Charter schools do not belong in our state. There is no need for them. Why not just loosen restrictions on public education?	N	See Response 1.
11/20/19	Jason M. Barr	I do NOT want any form or incarnation of charter schools in West Virginia	N	See Response 1.
11/20/19	Mary	Charter schools are not for West Virginia. Our students deswrve better.	N	See Response 1.
11/20/19	Liz	All charter schools should have to employee certified teachers at pay rates not less than the county of location.	N	Pursuant to W. Va. Code §18-5G-3(b)(1), charter schools have autonomy over personnel decisions. Policy 3300 allows this required flexibility, but does require charter schools to establish personnel qualifications, which may not be less than the qualifications required of alternatively certified teachers pursuant to W.Va. Code §18A-3-1, et seq.
11/20/19	Crystal Adkons	Charter schools do not work. They should not be allowed to operate in the state of WV.	N	See Response 1.

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11/20/19	Don K Springer	It is absurd for the already stressed taxpayers be asked to fund a second system for the elite ranks of WV. Mitch McConnell and his cronies should be ashamed of themselves.	N	See Response 1. Response 6: Response 6: Charter schools are public schools that are available to all students. W. Va. Code §18-5G-1, et seq. and Policy 3300 prohibit charter schools from selecting students based on prior high-performance levels, disability status, socioeconomic status, or other student characteristic except where explicitly allowed for to prioritize enrollment of students with special needs and at-risk students. Policy 3300 also requires authorizers to compare the enrollment of charter schools to surrounding non-charter public schools annually. The purpose of the review is to ensure authorizers take necessary action to prevent demographics at charter and non-charter schools from diverging excessively. Policy 3300 now explicitly states that authorizers who do not uphold their responsibility to monitor demographics of enrollment, mid-year transfer, and turnover at charter schools may be subject to adverse consequences.
11/20/19	BURLENE T FORQUER	I believe Private charter schools should remain privately funded and the state would fund public schools. I do not feel the general public taxpayers should have to pay for the private charter schools for the wealthy, and in which most of them cannot afford to pay more taxes and will not be able to afford these private charter schools for their children.	N	See Response 6.

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		Public schools need more supplies and more teachers and not more expenses to worry about		
11/20/19	Rebecca Sykes	I am opposed to charter schools in WV. Our public schools are already in dire financial straits. These new businesses will divert funds from our public schools. Rather than turning our public education over to private companies, I would prefer our state and local legislature make choices to improve public schools. In Berkeley County, we just voted to renew an excess levy. I believe the people of WV would be happy to support free and appropriate education. I would happily pay higher taxes, particularly if my county was transparent about where that money was needed and going. Thank you	N	See Response 3. Response 7: Charter school governing boards must be non-profit entities. While they may hire for-profit education service providers, charter school governing boards must disclose contract terms as well as any financial entanglements between the provider and the board. Furthermore, authorizers may consider such information—including whether profits are excessive—when deciding whether to approve a charter school application and/or execute a charter school contract. See Response 4.
11/20/19	Geraldine	I oppose the issuance of Public Charter Schools in the State of West Virginia.	N	See Response 1.
11/20/19	Krista Trabert	West Virginia needs to properly support the public schools that are running today. Diverting monies elsewhere is NOT what will fix our issues. We need a nurse and social wjustice raker at EVERY SCHOOL!	N	See Response 3.
11/21/19	Kim	I have experienced the downfall of charter schools in Florida. Students with special needs or those living in poverty were discriminated against by the charter schools. Requiring expensive uniforms or parents to commit to volunteering in the school, while kicking out those who cannot comply does not help our schools or our communities. The amount of financial corruption by charter schools is astounding. The charter schools take money away	N N	See Response 6. Response 8: Policy 3300 requires charter schools to meet the same accounting and financial requirements as non-charter public schools and engage in an annual external financial audit that must be submitted to its authorizer and the state superintendent. The policy also requires

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		from our public schools and create a negative educational environment, while making a profit.	N	charter schools to participate in the State Auditor's financial transparency website as non-charter public schools as described in W. Va. Code §18-9B-22. See Response 7.
11/21/19	Dr. Lisa Brewer	I am writing to report my objections to the charter school proposal. We should not be taking public money away from our public schools and turning it into private profits for charter schools. Not only does this undermine the purpose of our tax money, it comes at a time when we are facing a teacher shortage. We should be investing money into our public schools and finding ways of attracting talented teachers to work in our state rather than pushing them away.	N N	See Response 1. See Response 7.
11/22/19	Nicholas Martin	I think it is a very good plan, I fully support charter schools. I urge the legislators of the state of WV to defund public education completely. Currently it produces nothing but Marxist indoctrination, students with no knowledge of even basic Mathematics or English. Home schooling, private schools, charter school: ANYTHING but public education. Our nations entire future is in danger because of the current state of public education. It is incredibly harmful.	N N	Policy 3300 establishes charter public schools as a new part of the public school system. See Response 4.
11/23/19	Michael kessinger	We need public online charter schools in West Virginia so we have an option other than just home school. We do home school. It would be better than doing home school if we could have k12 here and they could have a real teacher but be done online we have been waiting for it seems like every other state has k12 we need it too. My daughter would really benefit from it as well as so many	N	While charter and non-charter schools can offer virtual classes, Policy 3300 prohibits fully virtual charter schools based on the substantial evidence based documenting a lack of success for students enrolled in virtual charter schools.

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		other home school families		
11/23/19	Ashlee Curtis	The public cannot see anything that is proposed to comment about the charter schools. In general, most people that I know, including me, oppose charter schools due to the inability for them to function properly. If the state government needs further proof that schools such as these fail, they can look to states such as Michigan and Indiana to see that these types of schools are a financial disaster for most states. They benefit nobody, except maybe the private investors. I'm not so sure why there is a push for the charter schools when most of West Virginia constituents have clearly said, "NO."	N	See Response 1.
11/24/19	K Fisher	n/a	N	
11/25/19	Leslie Wright	The state of WV definitely needs to improve education but it need to be accomplished through our existing public schools. Charter schools will negatively impact public schools by taking much needed funds from our public schools.	N	See Response 3.
11/25/19	Laura Perry	Waste of money	N	See Response 1.
11/25/19	Cheryl	WV suffers from an economic crisis that has lead to an addiction crisis, and these underlying issues are what affects our educational Outcomes. It doesn't matter what students are or are not offered, if they suffer from trauma that has not been dealt with, they cannot engage in the opportunities presented to them. Until our economics issues are resolved, WV students and their educational outcomes will continue to suffer. Charter schools will not help this situation, but make the gap between the haves and the have-nots in our state.	N	See Response 1.
11/25/19	Gibson Terrell	Charters funnel tax money to private businesses. This should be illegal. WV politicians are greedy and	N	See Responses 7 and 8.

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		they don't want to provide health insurance or retirement programs so they want to outsource education.		
11/26/19	Anh Alderton	Its necessary to have alternative school system to balance and improve the old (traditional public school)and new techniques.	A/S	
12/2/19	joseph FORD	5 Charter Schools would be the best thing ever to happen for WV students. The Unions do not want competition in education. Competition would expose the incompetence of public educators.	N N	W. Va. Code §18-5G-1, et. seq. authorizes the establishment of no more than 3 charter public schools (or charter schools) in West Virginia until July 1, 2023 and three additional on that date and every three years thereafter. See Response 5.
12/2/19	joseph FORD	5 Charter Schools would be the best thing ever to happen for WV students. The Unions do not want competition in education. Competition would expose the incompetence of public educators.	N N	W. Va. Code §18-5G-1, et. seq. authorizes the establishment of no more than 3 charter public schools (or charter schools) in West Virginia until July 1, 2023 and three additional on that date and every three years thereafter. See Response 5.
12/3/19	Wendy Epling	I am a School Nurse in Raleigh County, and I am a parent of a WV secondary student. I do not believe that Charter Schools are in the best interest of WV students. Giving student and parents choices such as this, will not solve the education problem. Blaming teachers will not solve the problem. Pushing test scores will not solve the problem. The problems with our students is support at home. Most of our children do not have support from family at home to help with homework and such. Parents are working 1-2 jobs trying to make ends meet, or drug addicts, or just neglecting their	N	See Response 1.

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		<p>children in general by blaming the school systems for raising their children. Children do not respect teachers, because parents do not respect them. They believe they are entitled. All you are doing with charter schools are continuing to allow them to feel entitled. My husband has family in NC and weve discussed their charter schools and what they think of them. They have told us that the education is poor and all it does is take money from the public school system. Its a way of catering to what the parents want to see and not to what the students need. I trust what they are saying as they have raise 4 children in that location. I feel that these charter schools are a step back for WV.</p>		
12/3/19	Theodore Webb	<p>Public schools must equally educate all students. I have seen nothing that indicates charter schools will equally educate all students, thus charter schools are unconstitutional. Also note people without kids have already paid a lifetime to support and build our public school infrastructure & are now expected to pay on top of that for charter schools that are NOT public yet are taking tax dollars. This is unconstitutional toward the rights of all kinds of people in our state.</p>	N	See Response 1.
12/10/19	Renee Mahon	<p>I have fought against charter schools from the beginning and will continue to fight against them. They take money from public schools and do not offer nearly what a public school offers. I think the state department needs to do what they can to get rid of charter schools.</p>	N	See Response 1.
12/12/19	Danielle Empson	<p>West Virginia has been ranked among the lowest in education for decades. In recent years, many schools have been closed due to lack of attendance. There is not a single middle school in</p>	N	See Response 3.

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		my county (Kanawha) where I would feel comfortable sending a child of my own because of safety issues at the schools. Directing funding to establish charter schools would be a waste of public education dollars that could be better spent improving existing schools. Moreover, charter schools commonly require lower teaching credentials than traditional public schools and given the poor education outcomes already existing in the state, it makes no sense to open schools with reduced teacher training requirements. Opening charter schools would also take students away from existing schools thus further reducing their budgets and student counts, and possibly forcing additional schools to close.	N	See Response 2.
12/12/19	Nelson Smith	By way of introduction, I am a resident of Shepherdstown and have been active in the charter movement for more than two decades, including service as the first President and CEO of the National Alliance for Public Charter Schools and as senior advisor to the National Association of Charter School Authorizers. I commend WVDE for this well-crafted draft Rule. While the new statute itself is regrettably limited in scope, these draft regulations do a sound job of interpreting and, in some cases, clarifying what the legislature approved. I have a number of specific comments and recommendations that follow.	A/S	
12/28/19	Gibson Terrell	Charters are failing all over the country and the taxpayers lose their money to a private company that does not have the best interest of the taxpayers and students. They want to get the money and run.	N	See Responses 7 and 8.
1/2/20	Tanya	A travesty that should have been bored on by the	N	See Response 1.

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		public.		
1/3/20	Shawn Wright	I admittedly did Not like this Bill & think it is bad for West Virginia.	N	See Response 1.
1/5/20	Millie Stoneking	The table with lists of no increase nor decrease is extremely misleading. There is a disclaimer before the table, but is probably missed by many reading the policy. The cost to the state and local boards of education could be devastating—lost enrollment, supplementing areas that the charter does not provide and community support. No one can estimate that monetary amount.	N	There is no clear way to estimate the fiscal impact due to the many forms that a charter school could take and the uncertainty of how many, if any, will be authorized for each year. For more information on funding of charter schools, see Response 3.
1/7/20	David M Gladkosky	I appreciate all of the work and attention to detail in crafting this policy. Thank you for the inclusion of all stakeholders along with their concerns and ideas.	A/S	
1/7/20	Tracy Harlan	Overall with the expansion of Charter schools, I believe we will see a wider gap in segregation in the areas of Students with Disabilities, economic status, student achievement, and an increase in the already serious epidemic of unwillingness and denial of public school social issues like counseling, foster care, students being raised by grandparents, and abuse.	N	See Response 6 for how Policy 3300 addresses potential differences in student demographics.
1/7/20	Jeremy	We	N	Comment unclear.
1/8/20	Madelyn Fisher	Charter schools are a failure and shouldn't exist in WV.	N	See Response 1.
1/8/20	Francis Marion	Charter schools are just a way for out of state corporations to make money from the state. They will take money away from county boards of education without having to abide by regulations. They can get money for transportation without having to provide transportation. They will also hand pick pupils. Teachers won need to be	N N N	See Response 7. Response 9: Pursuant to W. Va. Code §18-5G-1, et. Seq., Policy 3300 does not require charter schools to provide

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		<p>accredited. This in no way will improve education in WV.</p>		<p>transportation, but if they do so, it requires them to follow the same requirements as non-charter public schools. This does not preclude an authorizer from considering an applicant’s plan for transportation during the evaluation of a charter application. Additionally, Policy 3300 requires authorizers to review student demographics of charter schools on an annual basis. If transportation leads to significant and persistent demographic differences with surrounding public schools, the authorizer may require the charter school to take corrective action and/or appear before the WVBE. Finally, Policy 3300 includes provisions that provide additional funding for county boards of education that experience transportation costs that exceed initial Step 4 allocations..</p> <p>See Response 2.</p>
1/8/20	Marianna Ruggiero	<p>With Forbes recently reporting that a billion dollars has been spent on charter school waste and fraud, and WV struggling to fund its public schools, I think it is completely irresponsible to waste everyones time and money opening a few charter schools. We need to put our energy and resources into the schools that we have. Yes, our scores are low, but this is because so many of our students are struggling, and a charter school won change that. Don throw tax payers money down the drain to open charter schools when it could be used to hire</p>	N	<p>See Response 1.</p>

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		teachers aids, behavioral therapists, counselors, social workers, nurses, and purchase school supplies.		
1/9/20	Kary Lemley	Charter schools are a waste of tax payers money.	N	See Response 1.
1/9/20	Jason Armentrout	Charter schools will only create another layer of bureaucracy and further complicate our system of education. They will also deplete our schools of much needed funding.	N	See Response 1.
1/10/20	Travis Wells	The primary goal of charter schools is to generate profit, even in non-profit charters. Charters (profit and non profit alike) have a long, well documented history of taking money from public education and generating large profits for a small group of investors. Investors that have used those profits to lobby our state representative so that they can use our students as a source of additional profit. While Charters can SOMETIMES show positive academic growth, longitudinal studies have shown that they perform no better on average than traditional public schools. When they do out perform a public option, it is due to their ability to segregate their students and choose only top performing students, creating a false appearance of excellence by excluding students who struggle.	N	See Response 5.
1/10/20	Mary Lickert	To the WV BOE: You've not shared necessary information with the public. Folks, you know where problems are in our state, but haven provided us with statistics which would negate any rationale for the charter school fix. Now you want comments. Below is a very slightly altered op-ed which appeared in the Charleston Gazette-Mail on 6/11/19: We certainly are being driven in reverse when it	N	See Response 1.

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		<p>comes to West Virginia public education. During my last ten years in the field, we received one 2% raise. The underfunded PEIA charged more and offered less, reaching a crisis in 2018.</p> <p>Now, according to some politicians, we have money for charter schools and education savings accounts to pay private and out-of-state operators. In the spring of 2018, proponents could've conducted hearings around the state, but waited until they wasted much of this winter's regular session with a 140-page behemoth – SB 451. No problem. We now have another whopper, the Student Success Act – SB 1039. Taxpayers are expected to pay for special sessions at \$18-20,000 a day. Senate leaders in the effort are from the fields of cyber sales, water filtration, and some substitute teaching. While they are smart people who've learned the legislative system and their talking points, I don't know where their educational expertise comes from.</p> <p>We are told that West Virginia must do something about education because results are terrible, usually followed by a few statistics. The public must have complete facts and charts about student performance, health, and socio-economics. I hear blame placed on classroom teachers when we don't even have basic information about the stresses on our state. Where does West Virginia place nationally on free/reduced lunches, SNAP assistance, children in single-parent homes or with grandparents, foster care, drug abuse, unemployment, and so on? I bet we're way up</p>		
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		<p>there. The DHHR would have those figures. Where are test results low? In rural or distressed areas with high unemployment? The WV BOE has the statistics.</p> <p>How much do the charter operators and ESAs take for each student? Which ones are selected? How are charters doing in Ohio, Michigan, California, and elsewhere? Where are national figures? Who is pushing the privatization move here – the so-called WV Chamber of Commerce with how many out-of-state corporations? The Americans for Prosperity, funded by the Koch mega-billionaires?</p> <p>With the track record and absence of facts from those pushing the sweeping remake of our public education system, I am beyond insulted. Do you choose sides or buy anything with no data? Why are there not ten to twelve separate bills?</p> <p>Education is our biggest expense and obligation to West Virginia’s young people. We can not accept unqualified people, with no information, promoting a bundle that looks like a boondoggle. Folks, we need facts and must know who is sponsoring this agenda. Success? Prosperity? SB 1039 sure looks like a big sales job on a used stretch limo. The upholstery may be great, but it hogs gas and the engine might give out after 10,000 miles. Don’t buy it and tell them NO. We must demand real information and solutions in specific, targeted legislation. Please stand up for our kids and tax dollars!</p>		
1/10/20	carole Joy garrison	I will return with more specific comments, but first:	N	See Response 7.

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		<p>A Cautionary Tale</p> <p>As policy 3300 makes its way through the drafting process I'm reminded of the negative consequences that the privatization of education, like charter schools, can have on a society. A case in point is Cambodia, a small SE Asian country, scored on talent indicators such as education levels, vocational and technical skills, and the use of technology and social networks, ranked 108 out of 118 countries overall, and last of 13 nations in its region.</p> <p>When I first worked in Cambodia in the 1990's teachers had to moon-light selling cigarettes in nightclubs or worse, so they could survive on the small pay teachers' received. Many teachers got no pay at all. Cambodia's economy and educational infrastructure had been devastated by the genocidal Pol Pot and the bombings of US B-52 bombers. The Khmer Rouge allowed no education. Our bombers destroyed Buddhist pagodas, the other institution which provided education and literacy training. In the vacuum that followed the 1993 elections, Cambodia embarked on a program of privatizing state-owned enterprises. While this did not officially include public education, it opened the door for every kind of entrepreneur to open a private (aka charter) school. They came from everywhere. They came to make money. Education was not the priority. Continuing till now funding for public education in Cambodia, is inadequate and unfairly distributed, after-all, private schools had sprung up like mushrooms relieving a corrupt government of their moral responsibility for universal education.</p>		<p>Response 10: There is a deep evidence base on charter public schools in the United States that is more germane to Policy 3300 than evidence from private schools on other continents. The evidence based on charter schools suggests mixed results overall and highlights the key role of the authorizing structures and regulations that govern charter schools. Policy 3300 aims to learn from the success and failures in other states to create conditions most likely to improve student outcomes.</p>
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		<p>But worst of all is that this government dependency on unregulated private education has further and dramatically contributed to the bifurcation of Cambodian society into the haves and the have nots. Educating the haves, neglecting the have nots. Finally, private schools have encouraged their students to migrate, creating a brain drain of many of Cambodia's best and brightest.</p> <p>What can charter schools do for West Virginia, nothing good!</p>		
1/10/20	Dr. Carole Garrison, PhD	<p>Applicants should include a statement on how they plan to implement the vision and mission of the charter school. In addition they should include in the application verification that the educational program will be based on State standards; how they plan to address the reading curriculum and how they will monitor its success; include a statement about school culture and safety; and include a 5-year (minimum) operating budget.</p>	A/S	<p>Policy 3300 establishes charter school application criteria that direct authorizers to evaluate the applicant's ability to achieve its education mission and describe how their program will contribute to student mastery of West Virginia College- and Career-Readiness Standards. The policy also outlines evaluation criteria related to school culture, student safety, and ensuring financial viability.</p>
1/12/20	Marilou McClung	<p>This is a joke. You are letting the charter determine graduation requirements. Do these requirements have anything to do with academics? They could use basket weaving 101 as a graduation requirement. PLEASE help our children.</p>	N	<p>Policy 3300 requires charter school applicants to include proposed graduation requirements in their application. Authorizers are required to evaluate these requirements as part of their application review and agree to these requirements as part of the charter contract. As a result, charter schools can only define their graduation requirements with approval from the county boards of education.</p>
1/12/20	Lisa Grover	<p>Dear President Perry and Members of the West Virginia Board of Education,</p> <p>The National Alliance for Public Charter Schools</p>		

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		<p>("NAPCS") is the national organization dedicated to raising academic achievement for all students by fostering a strong public charter school sector. For several years, we have worked with local and national partners to get a strong public charter school law enacted in West Virginia. We appreciate the opportunity to contribute to the draft rule making process.</p> <p>The purpose of this letter is to voice our overall support regarding the draft rules for public charter schools, while raising a few concerns about them at the same time.</p> <p>First, the rules generally reflect the intent and spirit of the state's charter school law to establish strong accountability measures for public charter schools. These measures go beyond the student performance expectations required of other public schools and will help assure that only the best public charter schools open and continue to operate. These measures align with many of the accountability provisions found in our model charter school law.</p> <p>Second, the rules mostly reflect the statutory requirements to assure strong authorizer practices set forth in W.VA. Code §§18-5G-1. For example, authorizers must affirmatively establish in writing nationally-benchmarked oversight and monitoring policies and practices they will utilize in their oversight and monitoring role. The rules place appropriate guardrails on authorizer decision-making processes, such as conducting an in-person</p>	<p>A/S</p> <p>A/S</p> <p>A/S</p>	
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		<p>interview with charter school applicants, basing decisions on documented evidence collected through the application review process, adhering to specific timelines, and avoiding conflicts of interest. These accountability provisions will help assure that both authorizers and charter schools adhere to performance standards that ultimately will produce high academic outcomes for students.</p> <p>The NAPCS also has a few concerns with the charter school rules, especially when they go beyond the statutory authority enacted in W. VA. Code §§18-5G-1, et seq., via HB 206. First, although the rules reference charter school autonomy and flexibility, they do not include the specific statutory provision that automatically exempts public charter schools from most statutes and rules applicable to non-charter public schools and the State Board of Education. This oversight should be corrected so that both the public charter school and authorizer remain clear about their respective roles and responsibilities. Additionally, the rules state that an authorizer is required “to tailor charter school flexibility outlined in state code to the educational mission of the school and the needs of the student and community.” This authorizer overreach contradicts the statutory exemption from most applicable laws and regulations and may inhibit a public charter school from adjusting its academic program and operations to fit the needs of students, families, and educators.</p> <p>Second, the rules contain a mandate that the authorizer and public charter school conduct annual and mid-year enrollment reviews to</p>	<p>N</p> <p>N</p> <p>N</p>	<p>W. Va. Code §18-5G-1, et. seq. clearly lay out the statutory rules surrounding charter school autonomy. Policy 3300 does not infringe on this autonomy.</p> <p>Policy 3300 requires authorizers to thoughtfully fulfill their responsibilities by considering the missions of authorized charter schools. Nothing in this provision contradicts the flexibility provided in W. Va. Code §18-5G-1, et. seq.</p> <p>Policy 3300 establishes the enrollment, turnover, and mid-year transfer reviews</p>
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		<p>examine trends in charter school student demographics, transfers, and turnover. Should an authorizer find a deficiency in any of these areas, it may, at its sole discretion, require a charter school to create and implement a corrective action plan. Transparent recruitment and enrollment processes, and the provision that local county boards advertise a charter school as another option within its jurisdiction, are clearly stated in both the statute and rules. Thus, requiring enrollment reviews not only infringes on charter school autonomy but also places an undue burden on a charter school not contemplated in the law.</p> <p>Finally, the rules have no statutory basis to allow an additional authorizer to adjoin the public charter school contract should the public charter school enroll more than one third of students from a jurisdiction outside of the original authorizing county board. This provision is especially problematic since it does not allow the public charter school any input into this change. More important, it will likely mitigate the statutory authorizer accountability provisions that are key to the strength of West Virginia’s charter school law.</p> <p>We respectfully request the State Board of Education to consider amending the rules and incorporate our concerns to better reflect the letter and spirit of HB 206. Please contact me at lisa@publiccharters.org should you have any questions or need further information. Thank you for your work to create more educational choices for West Virginia children and families.</p>	<p align="center">N</p>	<p>provide a mechanism to provide transparency and ensure authorizers to fulfill the intent of the W. Va. Code §18-5G-1, et. seq. that charter public schools are open to all students. As outlined in code, charter schools receive exceptional autonomy in exchange for exceptional accountability. They are also required to offer open enrollment to all students without discrimination except where specifically detailed. The enrollment, turnover, and mid-year transfer reviews provide an important mechanism to hold charter schools to the standard of exception accountability when it comes to open enrollment.</p> <p>Throughout W. Va. Code §18-5G-1, et. seq., statute does not consider situations in which a charter school enrolls significant numbers of students from outside its primary recruitment area. Policy 3300 includes necessary provisions to adjudicate situations in which a large portion of enrollment at a charter school comes from a county outside the primary recruitment area.</p>
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		Sincerely, Lisa S. Grover, Ph.D. Senior Director, State Advocacy and Support		
1/12/20	Amy	I would like to comment on the cutting the U.S. History from the education system by reducing to to near nothing, this would be a grave mistake. We can clearly see through young people babbling on in this country as to how badly they need to go back and retake a history class. One of the standards should be making young people learn the terrible effects that socialism has on a country.	N	This comment is not germane to Policy 3300. It appears intended for proposed revisions to Policy 2510.
1/12/20	Eric Williams	The tax paying citizens should not be paying for private schools.	N	See Response 1.
1/12/20	Cortney Brock	Charter Schools will significantly hurt the public school system and will force good and certified teachers to leave the state. Charter schools will drain public school funding, leave the unfortunate and lower performing students all together, with no resources and unqualified teachers.	N	See Responses 1 and 3.
1/13/20	Jo Perez	Charter schools will detract from public education and take needed funds away from schools that serve everyone.	N	See Responses 1 and 3.
1/13/20	Dale Lee	WVEA believe the policy does not do enough to address the loss of funding from the other schools in the county should a charter be awarded. The loss of funding could lead to program elimination, larger class sizes and school staffing problems. Surely, the push to have a charter schools for a limited few was not intended to impede the learning of the other students in the county.	N	See Response 3.
1/13/20	Jennifer Jones	I believe that the charter schools should be funded without public tax dollars.	N	See Response 3.
1/13/20	Rebecca Speakman	I do not feel that charter schools are beneficial to	N	See Response 3.

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		the children of WV because, ultimately, charters will decrease money that is allotted for public education. Charters do not have the oversight and guidelines that our public schools have and there are too many loopholes that will exclude our most villanelle children.	N	See Response 1.
			N	See Response 6.
1/13/20	Pamela JW Cain	<p>I noted that this policy has "External Groups" listed as Stakeholders. All of these "stakeholders" are out-of-state Charter Schools or activists.</p> <p>A Stakeholder is a person, group or organization that has interest or concern in an organization. These people/ organizations are not interested in WV childrens education. They are focused on their own businesses.</p> <p>I am appalled that out-of-state interests are included in the creation of important policies. Intelligent policy makers would, of course, consult with out-side interests to research how other districts programs work. However, non-WV organizations should not be considered stakeholders. WV citizens are the only stakeholders.</p>	N	As noted in the comment, crafting a strong policy requires consulting with external groups who have experience at the national, state, district, and school level about how to establish appropriate regulations on charter schools. The WVBE believes that acknowledging the contributions of these groups is critical to providing transparency to this process. At no point were the interests of these external groups considered. They were consulted only in an attempt to strengthen this policy for the students of West Virginia.
1/13/20	Ric MacDowell	<p>I worry that there are not specific requirements to prevent too much virtual instruction to take place in charter schools. Too much virtual instruction doesn't allow important interactions between teachers and learners.</p> <p>The review process is really important to help insure quality education in WV.</p>	A/C	Policy 3300 now includes a cap on the proportion of instruction that a charter school student may receive virtually.
			A/S	Policy 3300 establishes charter school application and renewal review processes based on national norms with additional provisions specific to the West Virginia

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				context.
1/14/20	Sarah Reggi	I greatly disagree with the formation of charter schools. Charter schools have proven to take money away from funding public schools which already operate on shoestring budgets. Charter schools are known to be mishandled leaving students no better academically (and in other cases worse off) than if they had not attended a charter school. Charter schools do not require teachers to be certified and are not required to have accredited special education and related staff (e.g. PT, OT, SLP services). Charter schools do not have the same accountability and do not use the same measurements of student performance. West Virginia needs to think out of the box and look for ways to better support public schools first.	N N N N	See Response 1. See Response 3. See Response 6. Response 11: Pursuant to W. Va. Code §18-5G-1, et. Seq., Policy 3300 requires charter schools to participate in the same annual state testing and state accountability system as non-charter public schools. Policy 3300 also requires charter schools and authorizers to agree, in the charter contract, to a performance framework with additional accountability measures aligned to the specific educational mission of the charter school that goes beyond state accountability for non-charter public schools..
1/14/20	Terri Engnoth	Although I may not be writing in the correct boxes in order to comment on the 55 page policy, please do not disregard my comments. I made 5 attempts to obtain information from WVDE about this policy. However NO ONE in charge of this policy clarified anything for me. In fact, four out of the five emails I sent went unanswered.	A/C	The WVBE and the WVDE appreciate all comments and consider the merits of each individually.
1/14/20	Leah Earle	No Charter Schools	N	See Response 1.
1/14/20	Carolyn Wagner	Teachers who teach at the proposed charter schools should have to be certified just like public	N	See Response 6.

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		school teachers. The language in 3300 should reflect that. The lack of the language of 3300 undermines teachers education levels.		
1/14/20	Bill Glover	I will be brief. I am totally in favor of charter schools for West Virginia. As a teacher in WV for 38 years I have witnessed a constant downhill slide in standards and outcomes in the county where I teach. Program after program has been introduced at great cost to produce no positive outcome with at least status quo being the best result. The Introduction to Majors/Clusters program begun in the 1990s and continuing today has been such a failure that it has created a unique type of drop-outs-those who don't complete their cluster. Lazy and/or disruptive students (as well as lazy teachers) are holding back bright students with promise. These potential high achievers need a challenging learning environment free from distractions and disruptions. The teachers in such environments must be allowed to use creative methodologies that accelerate learning. Too often teachers have had to sit through staff development presentations about yet more of the latest strategies used by "experts" who have never spent time in public schools such as those in West Virginia. I, as well as my colleagues, find it insulting to watch videos that depict large state-of-the-art classrooms with less than twenty well-dressed and totally respectful and quiet students (who are most likely hand picked and acting), knowing that the situation could not possibly apply in a typical classroom in West Virginia where students simply are not interested in an education, many who are on parole or come from dysfunctional homes. I would hope that	N	This comment confuses charter public schools with magnet public schools. Pursuant to W. Va. Code §18-5G-1, et. seq., Policy 3300 explicitly bans charter from selecting students based on prior high performance. Charter schools must be equally available to all students, except for a small set of enrollment preferences. See Response 5.

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		charter schools would offer a successful route to a diploma that would be open to all who want to be their best. I also wholeheartedly support magnet schools.		
1/14/20	KimLovinski	WV does not need, nor can the state afford, charter schools. Adequately fund existing schools and pay teachers more.	N	See Response 1.
1/14/20	Tim Hardesty	How can charter school teachers continue to earn seniority in the district while employed by the charter school? Teacher seniority should comply with West Virginia Code -18-5G-3(b)(7). No Statutory reference found in Draft Rule 3300	A/C	Response 12: Pursuant to W. Va. Code §18 5G-3(b)(7), Policy 3300 now includes explanation of authorizers/county boards of education responsibilities regarding seniority accrual of charter school educators previously employed by county boards of education.
1/14/20	Ryan Saxe	How can charter school teachers continue to earn seniority in the district while employed by the charter school? Teacher seniority should comply with West Virginia Code -18-5G-3(b)(7). No Statutory reference found in Draft Rule 3300	A/C	See Response 12.
1/14/20	Jedd Flowers	<ul style="list-style-type: none"> • How can charter school teachers continue to earn seniority in the district while employed by the charter school? • Teacher seniority should comply with West Virginia Code -18-5G-3(b)(7). No Statutory reference found in Draft Rule 3300 	A/C	See Response 12.
1/14/20	Christopher Ryan	Charter Schools are a waste of money and not needed. Its basically a private school funded by the tax payers. No independent school or organization should be publicly funded.	N	See Response 1.
1/14/20	Christine King	Charter schools sip[hon money away from public education and unfairly benefit the students from	N	See Response 6.

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		<p>higher income. Our state is already experiencing a qualified teacher shortage and this would make the problem much worse.</p> <p>Charter schools in other states have failed because education is not a business and cannot be run as such. The goal of a business is to make money and the goal of education is to produce productive and educated members of society. Their goal is not the same. While education needs to be fiscally responsible, it cannot be operated according to someones bottom line.</p>	N	See Response 7.
1/14/20	Mark Swiger	<p>This policy needs to recognize the importance of elected school boards making fiduciary and policy decisions for public charter schools if the charter school must answer to the public for its performance. The lack of expertise on charter boards in the area of formal education concerns me. i.e. a lack of teacher involvement on the charter board concerning consulting on special needs IEPs, research-based strategies that raise student achievement, and advocacy for all students from an educator perspective. Parents and community members are important to existing LSICs, but teachers are pivotal in the administering of school improvement; the charter boards need to reflect the same.</p>	A/S	<p>Response 13: Policy 3300 requires county boards of education, as authorizers, to evaluate the qualifications of charter school applicants and proposed board members prior to approving a charter school application, signing a charter contract, and authorizing the opening of a charter public school. Authorizers are specifically directed to evaluate the educational, legal, leadership, financial, human resources, and leadership expertise and experience of the applicants and proposed board members to determine if they have the capacity to execute the required roles and responsibilities outlined in Policy 3300.</p>
1/14/20	Renee Mahon	<p>I am commenting on Policy 3300 because I am a public school employee and I believe in public schools. I do not want a charter school anywhere in West Virginia. They will take money away from public schools and hurt our students and community. Under this policy, they will not be held to the same standards as public schools, which</p>	N	See Response 1.
			N	See Response 11.

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		means our students will not be getting the quality of education they deserve and there won be a true indication as to whether they can succeed with public schools or not. This is not fair and should be changed. I really wish our legislators had listened to the 80% of West Virginians that said NO to charter schools. I hope you will do what you can to help public schools and make things more fair.		
§126-79-2. Purpose.				
11/15/19	Mary Deskins	I am opposed to charter schools. If WV must have them, the school must have a way to ensure they will stay open the whole school year, use only teachers with at least a bachelor's degree, provide teachers will pay equal to at least the same as the public school teachers in that zip code, institionalize an audit system that confirms the number of students actually enrolled and attending, be required to have buildings that meet the same safety and comfort standard as the public schools in that zip code, and not allow for-profit businesses to be hired or used for that school.	N	Duplicate comment from Section 1.
11/17/19	Ashley Prichard	Takes more funding away	N	See Response 3.
11/17/19	Kim Kelly	I am a parent, and I do not want funds for charter schools taken from my daughter's public school.	N	Duplicate comment from Section 1.
11/17/19	Rondalyn Whitney	No to charters.	N	See Response 1.
11/18/19	Lisa Weihman	I do not want money that should be going to our public schools used to charter schools. I am sickened that there are legislators in Charleston buying up property and scheming to turn charter schools into private slush funds. The graft and unethical behavior of our legislators in passing this mess is evident to many of us.	N	Duplicate comment from Section 1.
11/20/19	Jason M. Barr	I do NOT want any form or incarnation of charter schools in West Virginia	N	Duplicate comment from Section 1.

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11/20/19	Liz	Charter schools should only be allowed for innovation and must should significantly higher educational outcomes than state and county averages.	A/S	W. Va. Code §18-5G-1, et seq. provides for several purposes for establishing a process for authorizing charter public schools in West Virginia, including for encouraging the use of innovative practices. All public schools in West Virginia should be continually engaged in the process of improving instruction through innovation or adoption of successful practices.
11/20/19	Julie Yearego	I disagree the need for charter schools as more autonomy of general public education schools could produce same if not better results. For example, providing a greater aide formula to counties (minimum amount for smaller counties) to allow for the hire of more teachers to reduce the classroom sizes (for example, math class with 30+ students vs. 15-17 students would surely produce better outcomes in the smaller classes with more time to spend with students and put less stress on teachers/students). The expense to open an entirely "new charter" school would not make sense, when existing schools could expand their courses, provide more options with additional funding and qualified teachers would be far more financially sound.	N	See Response 3.
11/20/19	Geraldine	Throughout the discussion and forums and legislative sessions about public charters, there has not been presented one good purpose for the issuance of Public Charter Schools in our state. We already have public schools which serve the public and are accountable institutions already equipped.	N	See Response 1.

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		administrators at appropriate pay levels?		See Response 2.
11/23/19	Ashlee Curtis	Please see the comment above.	N	Duplicate comment from Section 1.
11/24/19	K Fisher	Public Schools should be given the opportunity to establish and execute more innovative programs along with true real-world centered curriculum. Public schools should be held to greater expectations and given more autonomy. Why can West Virginia lead the way in revitalizing our public school system? We can start by restructuring the school day. All students eat breakfast together - this provides a support system and family feel. Then all schools are required to provide a study hall period and a mentoring period. Many of our students do not have the support at home to help with homework, studying for tests, or class projects. Several of our students never feel like they are heard and would just like some to talk to and listen.	N	See Response 5.
11/25/19	Laura Perry	Waste of money	N	Duplicate comment from Section 1.
11/15/19	Cheryl	The purpose of charter schools is to allow businessmen to outsource our children's education and further exploit the WV economy. Charter schools are unnecessary for WV, and long-term statistics have proven in other states that charter schools in rural areas can not be sustained. WV actually leads the nation in many areas of instructional practice and professionalism. Our children need help; our families need opportunities to get out of poverty and make a decent living. WV people have spoken against charter schools because they are designed on purpose as businesses.	N	See Response 1.

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11/25/19	Gibson Terrell	Charters funnel tax money to private businesses. This should be illegal. WV politicians are greedy and they don't want to provide health insurance or retirement programs so they want to outsource education.	N	Duplicate comment from Section 1.
11/26/19	Anh Alderton	Innovation in teaching styles.	A/S	
12/3/19	Theodore Webb	Purpose "more educational options." Private schools are legal and fine. But tax dollars going to schools that are not truly public is a serious infringement on people who have already paid our whole lives for entire public school infrastructure. We can pay for charters on top of that. What about our right to afford kids? And what about their educational options? We can even afford kids & this terrible charter school scam that is going to funnel millions of West Virginians hard earned tax dollars out of state is going to cost our own ability to have kids! So no educational options for them!	N	See Responses 1 and 3.
12/10/19	Renee Mahon	I am writing to comment on Policy 3300, which is the start of charter schools.	N	Comment unclear regarding thoughts on policy.
12/12/19	Nelson Smith	The first purpose of chartering, according to West Virginia's new charter school law (WV Code 18-5G-1(a)(1)), is to "Improve student learning by creating more diverse public schools with high standards for student performance." Improving student learning is paramount and this should lead the Purpose section of the Rule (126-79-2) as well.	A/C	Proposed Policy 3300 now incorporates language emphasizing the goal of improving student outcomes.
12/13/19	Paul Sandstrom	Im concerned that opening the State of West Virginia to charter schools will drain badly needed funds from our public school system. As has been seen in many other states, the privatization of education has only enriched investors while providing precious little return to the lives of children. 2.2 Talks about increasing autonomy	N N	See Response 3. See Response 7.

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		<p>while increasing expectations and accountability. I would like to know what kind of accountability is that? There seems to be some double-speak in here. Accountability comes from the implementation of rigorous standards and adherence to them. Our education system has been held to these standards for years. Why would we let children down now? The message we are sending is "We just don't think you can do it, so we are going to make it easier for you." How can we expect our children to become the best if we ourselves don't act like we believe in the best? If we are going to have charter schools, then I think they should be held to the highest standard. They should be well funded- but students must also be well challenged.</p> <p>Thank-you.</p>	N	See Response 11.
12/13/19	Ian Hillman	<p>The purpose of increasing student engagement and achievement and offering specialized academic and technical themes has the potential to reach students not reaching their full potential on the standard path.</p>	A/S	
12/21/19	Cheryl Cain	<p>"Studies on for-profit schooling in Africa and Asia show that for-profit providers fall short of meeting educational standards. For example, in Kenya and Uganda, Bridge International, Academies a US-based international education business runs k-12 schools where they employ unqualified teachers, strictly directing their performance in the classroom through standardized scripts." -American Educator Winter 2019-20</p>	N	<p>There is a deep evidence base on charter public schools in the United States that is more germane to Policy 3300 than evidence from private schools on other continents. The evidence based on charter schools suggests mixed results overall and highlights the key role of the authorizing structures and regulations that govern charter schools. Policy 3300 aims to learn from the success and failures in other states to create conditions most likely to improve student outcomes.</p>

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1/2/20	Tanya	The purpose is to cause division and steal public monies	N	See Response 1.
1/3/20	Shawn Wright	The purpose of this bill seems to be to take from the poor & give to the well off in its most simplistic form.	N	See Responses 3, 7, and 8.
1/4/20	Leslie Haynes	The statement that charter schools are "afforded significantly greater autonomy...in exchange for greater expectations and accountability" in comparison to non-charter schools. The outcomes must be made public annually, as are outcomes of non-charter public schools. Funds must be audited regularly but no less than every two years. All public schools should be converted to charters to gain access to this greater autonomy.	A/S	See Response 1. Additionally, W. Va. Code §18-5G-1, et. seq. authorize up to three charter schools until 2023 and three more that year and every three years thereafter. This rollout allows for the monitoring and evaluation of initial charter schools to ensure they contribute to improved student outcomes prior to any potential expansion of charter schools in West Virginia.
1/7/20	David M Gladkosky	The sections in this policy are well outlined. I do have concerns about accountability qualifications concerning the Governing Board, which I'll comment in the appropriate sections below.	A/S	
1/7/20	Jeremy	Dont	N	See Response 1.
1/10/20	Dr. Carole Garrison, PhD	Innovative? don you think that public schools are innovative, and capable of doing more with the proper state funding and self-rule! We don need charter schools for that!	N	See Response 1.
1/12/20	Danielle Stewart	2.1 This proposal will increase the cost of education and require a budget increase. 2.1 states that the purpose is to provide greater opportunities for students. However the same opportunities can be provided through the current education system without the cost increase with a change of regulations focused on public schools instead of creating a new school to get around the restrictions the legislature established.	N	See Response 1.

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		<p>2.2 This proposal will increase the cost of education and require a budget increase. 2.2 states that the purpose is to give more autonomy to a school. The legislature can provide that autonomy through the existing school system with changes to legislative items at no additional cost to the state.</p> <p>2.3 This proposal will increase the cost of education and require a budget increase. 2.3 states the the WVDE must provide support beyond just basic costs, further increasing the cost of the proposal.</p>		
1/12/20	Christine Nichols	<p>The implementation of Charter schools is unconstitutional. Privatizing education is a bad idea. The only winners are the companies and ESPs that own the schools. Politicians will end up creating and owning charters and have unfair control of a “public” institution and public money. Charters are bad for children with special needs. When they can’t succeed in charter schools they will end up back in public schools but their allocated “per pupil” state and federal funds will stay at the charter school and the public school will bear the financial burden.</p>	<p>N</p> <p>N</p> <p>N</p> <p>A/C</p>	<p>See Response 1.</p> <p>See Response 7.</p> <p>Response 14: Pursuant to W. Va. Code §18-5G-1, et seq., Policy 3300 prohibits elected officials, including county board of education members, from being employed or otherwise profiting in the creation or operation of charter schools unless they are already employed at schools that become conversion charter schools.</p> <p>Response 15: Pursuant to W. Va. Code §18-5G-1, et. Seq., Policy 3300 requires charter schools to follow all state and federal laws and policies regarding the education of students with disabilities. Additionally, language has been added to several sections of Policy 3300 to clarify the roles and responsibilities of charter</p>

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			N	<p>schools and county boards of education for providing special education services to students enrolled in charter schools..</p> <p>Response 16: Policy 3300 requires authorizers to review student mobility including for disciplinary reasons, to ensure charter schools do not have unreasonably high rates of mobility overall or among student subgroups. Authorizers may request charter schools take corrective action to address unreasonably high rates of turnover that are disruptive to student learning either overall or among subgroups. Corrective action may include appearing before the WVBE.</p>
1/13/20	Dale Lee	2.2 the policy states – “ charter schools are afforded significantly greater autonomy than non-charter public schools in exchange for greater expectations and accountability”. Yet nowhere in the policy are those greater expectations and accountability required, monitored, spelled out or demonstrated.	N	See Response 11.
1/13/20	Pamela JW Cain	<p>2.2 - states "...to establish a clear and transparent process....charter schools are afforded significantly greater autonomy... in exchange for greater expectations and accountability..."</p> <p>That statement circles on itself. One cannot have a "transparent process" when charters are basically given carte blanche ("greater autonomy") are not accountable to the parents because they are private businesses.</p>	N	<p>See Response 11.</p> <p>Policy 3300 requires that authorizers (county boards of education) engage in a transparent process for evaluating charter school applications and determining renewal. Charter schools are accountable to the contract they sign with the elected</p>

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				county boards of education.
			N	See Response 7.
1/14/20	Sarah Reggi	2.2 How will charter schools be held to a greater accountability? Will they have to meet greater expectations than public schools? I would hope that charter schools should have to meet the same requirements and be measured given the same standardized tests as public school students. If they do not perform better than their counterparts in public schools, this would prove that they are no better and would not be something that West Virginia should continue.	A/S	See Response 11.
1/14/20	Ashley Ramsden	Students should have increased opportunities through existing public schools by means of additional programming including but not limited to access to a full-time social worker for each county, and in larger counties, 2 or more workers, and additional support staff by means of counselors and mental health supports. Putting these additional staff members in a county to work solely on student needs outside of the classroom will enhance quality of education for all involved.	N	See Response 5.
1/14/20	Leah Earle	No charter schools	N	See Response 1.
1/14/20	Ryan Saxe	<p>Include the requirement of how the vision and mission would be implemented at the school.</p> <p>Include that the educational program be based on state standards and include an emphasis on reading.</p> <p>Add that the 30 days would be a onetime opportunity for the charter applicant to provide additional information for consideration in the</p>	<p>A/S</p> <p>A/C</p>	<p>Policy 3300 requires that, as part of each charter school application review, authorizers to evaluate 1) how a proposed charter school's program would achieve its mission and 2) how the curricula and instructional strategies will help students master the West Virginia College- and Career-Readiness Standards.</p> <p>Response 17: In response to this and other</p>

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		<p>application process.</p> <p>The feedback on the charter school application should provide basic deficiencies without specific details that result in the district rewriting the proposed charter application.</p>	A/C	<p>comments, Policy 3300 now clarifies that authorizers shall only provide a single 30-day revision period.</p> <p>Policy 3300 now clarifies that authorizers are only required to identify application deficiencies not suggest remedies.</p>
1/14/20	John Treu	<p>The statement “[t]o this end charter schools are afforded significantly greater autonomy than non-charter public schools in exchange for greater expectations and accountability than non-charter public schools” is problematic because (i) this statement is unclear and provides for subjective interpretations of achieving “greater expectations and accountability,” (ii) the statement implies a quid-pro-quo that does not appear directly in the statute, and (iii) the statement uses the defined term “charter school” rather than “public charter school,” which is inconsistent with the statutory language.</p> <p>First, the statement that the public charter schools are subject to “greater expectations” is fairly subjective and could potentially lead a school board to assess a public charter school on a higher standard than the statute intends. The term “greater expectations” is not found in the statute and we would recommend including primarily language from W. Va. Code § 18-5G-1(b) that provides for several purposes including, but not limited to, “improved student learning,” “innovative educational methods,” “distinctive school curriculum, a specialized academic or technical theme, or method of instruction.” In my view and as explicitly stated in the statute, the</p>	<p>N</p> <p>N</p>	<p>The description of the autonomy / accountability tradeoff in Policy 3300 emanates directly from W. Va. Code §18-5G-1(a)(6), which uses the phrase “exceptional levels of results-driven accountability.” Further, both the law and policy require that authorizers and charter schools agree to accountability measures beyond those included in the state accountability system as part of the charter contract.</p> <p>Response 18: The statutory term “public charter schools” implies the existence of charter schools that are not public. In Section 3 (Definitions), Policy 3300 defines “charter public school” and “charter schools” to be the same thing in an effort to clarify that all charter schools are public schools. Policy 3300 uses the term “charter school” rather than “charter public school” throughout for brevity.</p>

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		<p>purpose is to provide for diversity in offerings and so describing the purpose of the law as imposing greater expectations might disfavor a school with a specific theme that is otherwise wholly consistent with the statute, for example.</p> <p>Second, the notion that the law provides autonomy “in exchange for” greater expectations and accountability is subjective and not specifically stated in the statute. I would recommend replacing this with an “and” to correct this issue.</p> <p>Lastly, in this section the terms “charter schools” and “non-charter public schools” are adopted and then used throughout the rule. This terminology might lead a reader to believe a charter school is not a public school, which is inconsistent with W. Va. Code § 18-5G-1(c) as well as the terminology adopted throughout the authorizing statute. I recommend adopting the terms “charter public schools” and “non-charter public schools” throughout Rule 3300 as this is the terminology adopted in the statute (see e.g. W. Va. Code § 18-5G-1).</p> <p>Based on the above concerns, I propose the following language replace the language in the proposed rule:</p> <p>“To this end, public charter schools are afforded significantly greater autonomy than non-charter public schools to empower new, innovative, and more flexible ways of educating all children within the public school system to achieve the objectives specifically articulated in W. Va. Code § 18-5G-1(b), and public charter schools are subject to elements of oversight accountability that does not apply to non-charter public schools as a means of promoting</p>		
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		such objectives.”		
1/14/20	Mark Swiger	In section 2.2, there is mention of charter schools being held to a higher standard than non-charter schools. There is no evidence that charter schools will be held equally accountable to the public as to that of public schools. This is NOT specific enough. In addition, teacher evaluations should reflect similar accountability standards on public charter teachers as is demanded of non-charters. If, in fact, charter schools are going to be scrutinized more than public non-charters because of their increased "autonomy", specific accountability standards need to find their way into the policy.	N N	See Response 11. Pursuant to W.Va. Code §18-5G-1, et. seq., Policy 3300 does not require charter schools to use the same educator evaluation process as non-charter public schools. Policy 3300 does require charter school applicants to describe the performance management processes for staff in their application. Policy 3300 also requires authorizers to evaluate the proposed performance management processes as part of the application review process.
1/4/20	Renee Mahon	I believe there should be no public charter schools what so ever and the state department should support their teachers and do what they can to fight with us.	N	See Response 1.
1/14/20	Courtney Martin	There is no need for the establishment of charter schools in order for West Virginia schools to be innovative. If innovation is what the stat legislature desires, they can easily loosen the reins on the states public schools system and allow teachers to, well, teach instead of pushing standardized testing as the end game of the public education system.	N	See Response 1.
§126-79-3. Definitions.				
11/15/19	Mary Deskins	I am opposed to charter schools. If WV must have them, the school must have a way to ensure they will stay open the whole school year, use only teachers with at least a bachelor's degree, provide	N	Duplicate comment from Section 1.

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		teachers will pay equal to at least the same as the public school teachers in that zip code, institutionalize an audit system that confirms the number of students actually enrolled and attending, be required to have buildings that meet the same safety and comfort standard as the public schools in that zip code, and not allow for-profit businesses to be hired or used for that school.		
11/17/19	Kim Kelly	I am a parent, and I do not want funds for charter schools taken from my daughter's public school.	N	Duplicate comment from Section 1.
11/17/19	Rondalyn Whitney	No to charters	N	Duplicate comment from Section 2
11/18/19	Lisa Weihman	I do not want money that should be going to our public schools used to charter schools. I am sickened that there are legislators in Charleston buying up property and scheming to turn charter schools into private slush funds. The graft and unethical behavior of our legislators in passing this mess is evident to many of us.	N	Duplicate comment from Section 1.
11/20/19	Jason M. Barr	I do NOT want any form or incarnation of charter schools in West Virginia	N	Duplicate comment from Section 1.
11/23/19	Ashlee Curtis	Please see the comment above.	N	Duplicate comment from Section 1.
11/24/19	K Fisher	Public schools should also be allowed to create their own accountability plans. We need schools that help students who would like to attend college and schools that support students who would like to pursue a vocation. Middle school students need more vocational programs AND more support to succeed.	N	See Response 5.
11/25/19	Laura Perry	Waste of money	N	Duplicate comment from Section 1.
11/25/19	Gibson Terrell	Charters funnel tax money to private businesses. This should be illegal. WV politicians are greedy and they don't want to provide health insurance or retirement programs so they want to outsource education.	N	Duplicate comment from Section 1.

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12/3/19	Theodore Webb	no comment its terrible charter scam has been allowed to happen	N	See Response 1.
12/10/19	Renee Mahon	Charter schools take money from public schools and offer an education that is inferior to a public school. The teachers are not qualified to teach. They are not held to the same standards and therefore fail because they cannot perform.	N	See Responses 1, 2, and 3.
12/12/19	Nelson Smith	126-79-3:.5 This correctly clarifies a misstatement in the Definitions section of the law, that "Public charter school" means a public school or program within a public school." A charter school is a public school, not a "program within a public school."	A/S	
12/21/19	Cheryl Cain	" Studies on for-profit schooling in Africa and Asia show that for-profit providers fall short of meeting educational standards. For example, in Kenya and Uganda, Bridge International, Academies a US-based international education business runs k-12 schools where they employ unqualified teachers, strictly directing their performance in the classroom through standardized scripts." -American Educator Winter 2019-20	N	Duplicate comment from Section 2.
1/2/20	Tanya	The definitions are a waste of time	N	
1/3/20	Shawn Wright	Prioritizing a minority school population over a majority.	N	See Response 6.
1/4/20	Leslie Haynes	501©(3) status may be granted to organizations that are not true non-profits. Do the applicants need to possess any education qualifications to obtain state education monies?	A/S	See Response 13.
1/7/20	David M Gladkosky	Under 3.1, it says that "Charter schools must participate in the state accountability system. Later, in 3.5, it seems to put heavy responsibility on the governing board, to uphold this accountability along with performance, etc. In another section, it states the make up of a governing board, and I	N	See Response 13.

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		wonder if they will be qualified to shoulder this burden. See an additional comment about this in a later section.		
1/7/20	Jeremy	Want	N	See Response 1.
1/10/20	Dr. Carole Garrison, PhD	clarify with verifiable documentation all verbiage such as innovative and proven!!!!	N	The comment does not make clear reference to specific part of this section so cannot be addressed properly.
1/12/20	Jennifer Craig	accountability plan - no where is it stated that the charter school shall be held to the same standards of accountability as public schools via means of standardized testing etc.. this should be a requirement to meet the SAME accountability standards that public schools must meet.	N	See Response 11.
1/12/20	Danielle Stewart	3.1 A sentence should be added stating that the accountability plan for charter schools must meet or exceed the standards that public schools must meet. Failure to add this sentence will allow charter schools to negotiate lower standards for their performance.	N	Policy 3300 requires authorizers and charter schools to agree on accountability measures and expectations within the state accountability system and beyond that align with the charter school's educational mission. A charter school may focus on STEM education and require measures linked to the state science assessments. Another charter school may work primarily with students who are at risk of dropping out due to low credit accumulation and therefore requires different benchmarks for success than a comprehensive high school. Policy 3300 places responsibility for ensuring the rigorous definition and monitoring of these measures on the authorizers to allow for the flexibility envisioned.
1/13/20	Pamela JW Cain	3.2a - There is nothing in here that precludes people on these school boards who have a vested interest in establishing a charter school.	A/C	Policy 3300 now includes language prohibiting county board of education members from serving on charter

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		<p>People who plan on opening up charters or who are financially tied to Charter school programs/ organizations or, in any way, receive funding/ pay from a charter should NOT be allowed to sit on a board and vote on any aspects of Charter applications or reviews.</p> <p>Plus, the public should have complete control over the approval of charter schools. Establishment of a Charter should be put before the people and voted upon. A full 2/3 approval should be required.</p> <p>3.8/ 3.11 - It is not clear to me the difference between Governing Body and Education Service Provider</p>	<p align="center">N</p>	<p>governing boards. Additionally, see Response 14 for more information on how Policy 3300 guards against inappropriate financial entanglements. Furthermore, Response 4: Policy 3300 establishes additional evaluation criteria and reporting requirements for charter schools using/planning to education service providers (ESP), including required disclosure of ESP investors and financial entanglements between the ESP and the charter school governing board. Some for-profit and non-profit ESPs have demonstrated success in other locations so an outright ban is not warranted. The additional provisions in this section are designed to help authorizers ensure that contracting with ESPs is an effective use of public money to improve student outcomes.</p> <p>Pursuant to W. Va. Code §18-5G-1, et. seq., Policy 3300 places the sole authority for authorizing charter schools with elected county boards of education and requires boards of education to consider the ability of charter school applicants to provide evidence of demonstrated demand in the county for the proposed charter school. The inclusion of this requirement is intended to increase the likelihood that approved charter schools are sustainable.</p>
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			N	Governing boards are the entity accountable for the charter school to the authorizer. Education service providers are organizations hired by the governing board to provide some set of services related to the operation of the charter school. See Response 7 for more information.
1/13/20	Ric MacDowell	Seems that the proposed policy does not adequately address what happens when county boards ask the state board to act as the final authorizer. It's unclear in such situations what roles and responsibilities still will remain with the county board.	A/C	Section 7 of Policy 3300 now includes additional language specifying the continued responsibilities of the county board of education as the local education agency and to make every effort to assist the WVBE in its authorizing role.
1/14/20	Terri Engnoth	The charter school cannot offer more than 1 class per year on the computer. Virtual learning has terrible outcomes. No charter school can have a satellite campus and still count as one charter school, every campus counts as a separate school.	A/C	Response 19: In response to this and other comments, Policy 3300 now prohibits students enrolled in charter schools from receiving a majority of instruction through virtual programs.
1/14/20	Leah Earle	No charter schools	N	Duplicate comment from Section 1.
1/14/20	Heather DeLuca-Nestor	Teacher and Licensure Certification- Staffing plans, including certification/licensure requirements, should be the same as in other public schools in the county.	N	See Response 2.
1/14/20	John Treu	For consistency, I recommend adopting the terms "charter public school" and "non-charter public school" throughout Rule 3300 as this is the terminology adopted in the statute (see e.g. W. Va. Code § 18-5G-1).	N	See Response 18.
1/14/20	Renee Mahon	The charter schools need to be held to the same exact standards as a public school and get their money privately without taking from public schools. The state should put money into making alternative	N N	See Response 11. See Response 3.

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		schools that are statistically proven to help at-risk students and not charter schools.	N	See Response 5.
§126-79-4. Charter School Application.				
11/15/19	James E Hundley	should include a business plan that illustrates a financial plan that would help prevent failure during an instructional year. The building approval should have an overview from an architect who can verify the facility's safety and endurance for an educational setting with the report to be filed with the state department of education before being issued an entity identification.	A/S A/S	Policy 3300 requires charter school applications to address the sustainability of the proposed school. It also requires authorizers to monitor annual sustainability. Policy 3300 also requires charter school facilities to meet the same health and safety regulations as non-charter public schools.
11/15/19	Mary Deskins	I am opposed to charter schools. If WV must have them, the school must have a way to ensure they will stay open the whole school year, use only teachers with at least a bachelor's degree, provide teachers will pay equal to at least the same as the public school teachers in that zip code, institutionalize an audit system that confirms the number of students actually enrolled and attending, be required to have buildings that meet the same safety and comfort standard as the public schools in that zip code, and not allow for-profit businesses to be hired or used for that school.	N	Duplicate comment from Section 1.
11/17/19	Kim Kelly	I am a parent, and I do not want funds for charter schools taken from my daughter's public school.	N	Duplicate comment from Section 1.
11/17/19	Rondalyn Whitney	No to charters	N	Duplicate comment from Section 2
11/18/19	Lisa Weihman	I do not want money that should be going to our public schools used to charter schools. I am sickened that there are legislators in Charleston buying up property and scheming to turn charter schools into private slush funds. The graft and unethical behavior of our legislators in passing this	N	Duplicate comment from Section 1.

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		mess is evident to many of us.		
11/20/19	Jason M. Barr	I do NOT want any form or incarnation of charter schools in West Virginia	N	Duplicate comment from Section 1.
11/20/19	Liz	I think each county must pass a charter school levy to fund the charter school in addition to the regular school expenses.	N	Pursuant to W. Va. Code §18-5G-1, et. seq., Policy 3300 establishes funding guidelines under which 90% of per pupil total basic foundation allowance follows students to charter public schools. There is nothing in the law or the policy that would prevent a county board from considering a separate levy for charter schools.
11/20/19	Crystal Adkons	Should not even be discussed. The application can be discriminatory	N	It is unclear to what this comment refers.
11/20/19	Geraldine	The only reason a person or group would want to start a charter school is to gain state and federal dollars that would normally go to public schools.	N	See Response 7.
11/23/19	Ashlee Curtis	Please see the comment above.	N	Duplicate comment from Section 1.
11/24/19	K Fisher	Public schools should be given the opportunity to provide more educational options for their students. This should not be done in the form of charter schools, but in the form of increased vocational options and more real-world centered curriculum. Students should be able to read on grade-level, understand finances, and appropriately handle technology.	N	See Responses 1 and 5.
11/25/19	Laura Perry	Waste of money	N	Duplicate comment from Section 1.
11/25/19	Gibson Terrell	Charters funnel tax money to private businesses. This should be illegal. WV politicians are greedy and they don't want to provide health insurance or retirement programs so they want to outsource education.	N	Duplicate comment from Section 1.
11/26/19	Helen Gibbs	Funding for meal services should not be negotiable. Their plan should include how they intend to fund it. Transporting already prepared meals puts	N	Response 20: Pursuant to W. Va. Code §18-5G-1, et seq., Policy requires charter schools to comply with federal and state

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		children in danger of food poisoning due to temperature controls. Their budget should include these services on site.		nutrition standards when offering food services. Authorizers may consider the description of the food services provided in their evaluation of charter school applications and determining whether the school is likely to achieve its educational mission and improve student outcomes. Furthermore, Policy 3300 requires authorizers to review student demographics of charter schools on an annual basis. If the food services (including participation in federal Child Nutrition Programs), or lack of food services, leads to significant and persistent demographic differences with surrounding public schools, the authorizer may require the charter school to take corrective action and/or appear before the WVBE.
11/26/19	Anh Alderton	Should include all demographics.	A/S	See Response 6.
12/3/19	Theodore Webb	a charter needs to PROVE its public! does it Bus students to school? yes or no?! and what is stopping a charter from closing down during mid school year like happened in Michigan leaving students in the cold? no charter should be approved that cannot PROVE it is not financially solvent for Certain through entire school year. it should have to PROVE by accredited economic financial standards it will be solvent for 10 years at least, there should be at least \$10 million in reserve for each school to compensate if it closes or help students find another school	N N N	Pursuant to W. Va. Code §18-5G-1, et. seq., charter public schools are a form of public schools with greater autonomy and accountability than non-charter public schools. See Response 9. Response 21: Policy 3300 establishes that charter schools responsible planning for their financial sustainability. Policy 3300 also requires authorizers to evaluate the financial sustainability of charter school business plans as part of the charter school application review process.

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				Together, charter schools and authorizers must formulate plans for students who are attending a charter school that must close in the middle of a year for any reason (financial, safety, etc.) and include this plan in the charter contract.
12/5/19	Christina Myer	I was raising 4 children when I went back to school to get my Bachelors in Education. I worked very hard to meet the necessary requirements to become a teacher in West Virginia. Glenville State College did an excellent job preparing me to become a teacher. I am very proud of the hard work that not only myself but so many others have done and are currently doing to become a teacher in our state. How unfair to allow charter schools. It is my understanding that the only requirement for teachers is to have relevant academic or occupational qualifications or experiences that reasonably indicate they will be competent to fill the positions in which they will be employed. This is so unfair. Teachers at charter schools should be held to the same requirements as the public school teachers in our state. This is extremely unfair and insulting to the teachers in our state. What a disservice this will be to the students in our state. I hope that this will be revisited and corrected in policy.	N	See Response 2.
12/6/19	Margie Okelly	Charter school applications should also address plans for allowing students with limited access to reliable transportation to access charter schools. Poor, rural students would be disproportionately affected if charter schools do not provide transportation, undermining the policy of allowing access to all students.	A/S	See Response 9.

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		Requirements for teacher education and certification should be equivalent or higher than those of teachers at traditional public schools, establishing minimum requirements for all education funded by taxpayers.	A/S	See Response 2.
12/10/19	Renee Mahon	<p>There are many issues I have with the charter school application. The number one issue is that they are not being held to the same standards as public schools. When it comes to student education, students deserve the best curriculum and certified teachers. This policy does not hold them to the same standards and the students will suffer.</p> <p>Issue is Conversion charters. Simply doing a survey is not enough. There needs to be a vote amongst the community and there needs to be a threshold percentage.</p> <p>Issue 3- the language needs to be stronger to ensure location and positions for students and staff who choose not to remain at the school once it is converted to charter school.</p> <p>Issue 4- There needs to be a limit to how many students transfer and how many times a student tranfers. If there is no limit, it will disrupt the education process for the students and hurt funding for the schools.</p> <p>Issue 5- The enrollment window is too late. May 1st is too late because of budget purposes for schools.</p>	<p>N</p> <p>N</p> <p>A/C</p> <p>A/S</p> <p>A/C</p>	<p>See Response 11, which describes the accountability requirements for charter schools. While charter public schools do not have to adhere to the same operational standards as non-charter public schools, they must meet state accountability standards as well as individual accountability measures defined in their charter contract with their authorizer.</p> <p>Response 22: Policy 3300 acknowledges that community support is critical for start-up and conversion charter schools and requires applicants to document said support. It also requires authorizers to evaluate that support to ensure that it is enough to provide for the sustainability of any charter school. In the case of conversion application, authorizers must consider the level of support from existing students, staff, and families. Authorizers must also consider how the plan provides expanded educational options to students currently enrolled in the pre-conversion, non-charter public school and may evaluate whether a lack of transportation will limit the options of those students.</p>

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				<p>The WVBE did not feel it appropriate to dictate the level of support that each authorizer deems sufficient. However, there is nothing in the law or policy that would prevent a charter applicant from demonstrating this interest via a vote of community members.</p> <p>Additional language added to Policy 3300 that students must have reasonable alternative options and that authorizers and charter schools must develop a plan for meeting personnel law, policy, and deadlines for staff who do not remain at conversion charter schools.</p> <p>See Response 16.</p> <p>A revised timeline places the enrollment deadline on April 15th for the primary round and February 15th for every subsequent year.</p>
12/12/19	Nelson Smith	<p>126-79-4.3 In the charter school application section there is reference to a proposed handbook outlining personnel policies. Whether the handbook itself is fully included in the application, I would recommend that the handbook description include grievance or due-process procedures for staff. It should also explain to parents that they have recourse to the board and ultimately the authorizer in case of grievances involving their children.</p> <p>126-79-4.3.aa.3: In this section on closure, the</p>	<p>A/S</p> <p>A/S</p>	<p>Added suggestion to Policy 3300.</p> <p>Policy 3300 already includes the phrase</p>

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		statute reads “an assurance and agreement to payment of net assets or equity after payment of debts.” The draft Rule says “agreement to return net assets or equity to authorizer.” The reason for the change is not clear to me; it seems to assume that the chartering district owns everything in the building when, for example, substantial equipment may have been purchased through philanthropic contributions rather than local tax dollars. (This could be fixed by inserting “legitimately owed to authorizer” or similar language.)		“after payment of debts” in accordance with W. Va. Code §18-5G-1, et. seq.
12/13/19	Ian Hillman	The application is rigorous and strategically dictates how the charter school will improve student outcomes and I especially like how the application will have to demonstrate how the school will serve students underperforming in their traditional schools.	A/S	
12/21/19	Cheryl Cain	“ Studies on for-profit schooling in Africa and Asia show that for-profit providers fall short of meeting educational standards. For example, in Kenya and Uganda, Bridge International, Academies a US-based international education business runs k-12 schools where they employ unqualified teachers, strictly directing their performance in the classroom through standardized scripts.” -American Educator Winter 2019-20	N	Duplicate comment in Section 2.
12/28/19	Andrew	Virtual charter schools are going under all across the US. WVDE should limit one virtual class per year. WVDE should have state wide minimum for teacher credentials. At lease, WVDE should impose a minimum of public charter school teachers to have a four year degree in field of teaching and formal	N N	See Response 19. See Response 2. Policy 3300 prohibits elected officials,

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		<p>teaching experience.</p> <p>No public school member/ board of Ed member, and/ or any politician receive compensation from public charter schools or be on their board.</p> <p>Wv code 18- 5g-12does not say anything about leasing athletic facilities, school buildings, or technology. This wear and tear will cost public schools more money by replacing these items.</p>	<p>A/C</p> <p>A/S</p>	<p>which includes school board members, from receiving any compensation if charter school application is approved. Additional language was added to clarify this prohibition continues during charter school operations.</p> <p>Policy 3300 already requires charter schools and authorizers to agree to terms related to lease or rental of county board of education facilities, pursuant to W. Va. Code §18-5G-12. The authorizer/county board of education can incorporate the cost of additional wear and tear in determining the appropriate lease or rental terms. Policy 3300 now includes language addressing the lease or rental of county board of education equipment to charter schools, which was not addressed in W. Va. Code §18-5G-12.</p>
1/2/20	Tanya	The application! Seriously, it is designed to tilt the table for charter schools and promote the adoption.	N	No substantive suggestion. The application process in Policy 3300 builds on the requirements outlined in W. Va. Code §18-5G-1 et seq. as well as best practices from nationally recognized organizations supporting high-quality charter school authorizing.
1/3/20	Shawn Wright	The counties should have final say, not the state.	A/S	County boards of education are the sole authorizers of charter schools under Policy 3300 except under rare circumstances, pursuant to W. Va. Code §18-5G-1 et seq.
1/4/20	Leslie Haynes	The governing board cannot include parents when students are not yet accepted and enrolled, unless there is not timeline for a governing board to be in	N	The application requires a description of initial governing board members and a process for electing or selecting the full

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		place. It also appears that qualifications to be a teacher in a charter school are not comparable to be a public school teacher, yet success is expected. Charters do not seem to be required to accept students with special needs, only must plan for how they would serve such students (and one method of service is to deny initial enrollment for a general reason that would be difficult to prove). Overall, good detail in application requirements.	N N A/S	board, which must include two parents, pursuant to W. Va. Code §18-5G-1 et seq. See Response 2. See Response 6, which details how charter schools are open to all students regardless of needs. Charter schools cannot deny students enrollment based on special needs. Comment is supportive of the level of detail in this section.
1/5/20	Millie Stoneking	Teachers should have a valid teaching certificate for subject area employed to instruct.	N	See Response 2.
1/6/20	Andrea Hasley	WVMEA recognizes that the possibility of charter schools exist in WV educational policy. Since charter schools are public schools with existing requirements in place, curriculum and graduation requirements set forth in Policy 2510 should act as a basis for charter schools. It is the position of WVMEA that every public school in WV, including charter schools, offer the arts requirements as specified in policy 2510.	N	Pursuant to W. Va. Code §18-5G-1 et seq., Policy 3300 provides charter schools with autonomy over their educational program. Individual county boards of education, as authorizers, may specify their own, local evaluation criteria, which may include the requirement to provide arts instruction, for use in approving charter school applications.
1/7/20	David M Gladkosky	4.3.d.3 states an acknowledgement that the charter school participate in the states accountability system. This must be made clear that it is not agreement, but a requirement. As I view the FAQ section in the WVDEs Charter School Overview booklet, I see statements that begin with "county board and charter schools must agree". The parameters for these "agreements" must also be made clear. From 4.3.e.1 to 4.3.e.2.e it lists the make up of the	A/S N	Policy 3300 repeatedly states that charter schools must and will participate in the state's accountability system. Details on agreements between charter schools and authorizers are covered in the Charter Contract Section (§126-79-6). Policy 3300 requires the charter school

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		<p>Governing Board. It doesn't specifically state who on the board will preside. I also have concerns that this board will falsely think that they have more power to guide the charter school than the local county board of education.</p>	N	<p>applicant to describe the bylaws of the governing board and provides authorizers with the ability to request greater detail of the bylaws prior to approving the application if necessary.</p> <p>Pursuant to W. Va. Code §18-5G-1 et seq., the governing board is responsible for guiding the charter school. The county board of education (as authorizer) authorizes its existence and provides oversight to hold it accountable to the education mission and accountability measures agreed to in the charter contract. The authorizer is not involved in guiding the day-to-day activities of a charter school.</p>
1/7/20	Jeremy	ANY	N	See Response 1.
1/10/20	Dr. Carole Garrison, PhD	Charter schools should have a one-time, 30 day period for revisions to their initial application.	A/C	See Response 17.
1/11/20	Brandy Derrickson	WVDE should limit virtual learning to one class per year. Virtual charters are failing all over the country. The qualification for hiring qualified teachers and staff should be a minimum of at least one semester of student teaching and a four-year college degree. No legislator or school board member shall have a financial or personal stake in a charter school. WV code 18-5G-12 includes nothing about leasing and using athletic fields, sports equipment, or IT equipment. Given the cost of sports and IT equipment, more users will cause more wear and tear, and schools cannot quickly replace equipment.	<p>A/C</p> <p>A/C</p> <p>A/S</p> <p>A/C</p>	<p>See Response 19.</p> <p>See Response 2.</p> <p>See Response 14.</p> <p>Response 23: Policy 3300 already requires charter schools and authorizers to agree to terms related to lease or rental of county board of education facilities. The authorizer/county board of education can incorporate the cost of additional wear and tear in determining the appropriate</p>

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				lease or rental terms. Policy 3300 now includes language addressing the lease or rental of county board of education equipment to charter schools, which was not addressed in W. Va. Code §18-5G-12.
1/12/20	Jay O'Neal	<p>4.3b-- It says "shall not be a full-time virtual program." What does that mean? If its only 90% virtual, does that count?</p> <p>This language should be much clearer, and the school should only be allowed one virtual class per year, or no more than 20% of its courses. Virtual charter schools are the worst at improving student achievement. Please tighten up this language.</p> <p>4.3i-- The WVBE needs to set a minimum qualification for teachers-- at least a four-year degree and one semester of teaching experience. If the WVBE truly wants these schools to succeed, then they need QUALIFIED teachers.</p> <p>4.4b-- What are the current rates for "leasing" this equipment? How do we ensure charters are paying the correct amount? Also, what about extra "wear and tear" on athletic facilities and equipment?</p> <p>4.5f-- Doesn't the mere fact that a student and his/her guardians must apply to a charter school put in place a requirement that would EXCLUDE a child from enrollment at the school? We know that many parents are unavailable much of the time and many times it's impossible to even get a working phone number to contact them. Are these same parents really going to take time to enroll their</p>	<p>A/C</p> <p>N</p> <p>A/C</p> <p>N</p>	<p>See Response 19.</p> <p>See Response 2.</p> <p>See Response 23.</p> <p>Policy 3300 establishes a student enrollment application process that aims to minimize the effort necessary for a parent to express the desire to enroll their student in a charter school.</p>

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		<p>students?</p> <p>4.5o-- What about "kickbacks" that our legislators are already receiving? What would keep a county school board member from approving a charter school, and then later receiving a campaign donation from "Americans for Prosperity" (one of the groups promoting charter schools in WV)? This language needs to be tightened up-- no elected official should receive any monetary compensation from any groups that support or have ties to charter schools.</p>	N	<p>See Responses 4, 7, and 14 for restrictions already in place on financial entanglements between elected officials, governing board members, education service providers, and charter schools. Response 24: Beyond existing provisions, the WVBE cannot address the comment as it does not have the authority to address campaign finance restrictions. All elected officials, including county board of education members must follow applicable state and federal campaign laws.</p>
1/12/20	Jennifer Craig	<p>4.3.b Virtual learning- virtual charters are failing all over the county WVDE should limit virtual learning to ONE class per year.</p> <p>4.3.i minimum criteria for hiring qualified teachers and staff- while the policy calls for "relevant" qualifications it does not mandate that they be staffed with certified teachers, paraprofessionals, etc WVDE should set a statewide minimum for qualifications that are equal to that of teachers in public schools (if indeed these will be considered PUBLIC charters and take public tax dollars).</p> <p>4.5.o- elected officials compensation- whereas this policy prohibits elected officials from monetary compensation it does little to ensure that lobby groups that advocate on the behalf of charter school authorization or for charter legislation can contribute to their campaigns from groups such as</p>	A/C	<p>See Response 19.</p>
			N	<p>See Response 2.</p>
			N	<p>See Response 24.</p>

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		<p>ALEC , Americans for prosperity etc.. Elected officials should be required to report any contribution from charter corporations and those groups that advocate for charters.</p> <p>4.4.b leasing and using facilities/ equipment- WV code 18-5g-12 doesn include anything about leasing and using fields, equipment or IT equipment- given the cost of sports or IT equipment more users will cause wear and tear leaving the public schools an additional burden.</p>	A/C	See Response 23.
1/12/20	Danielle Stewart	<p>4.3.e.1 and subsequent sub paragraphs. The total board members should be increased to 7 and adding at least 2 board members appointed from the county board of education where the school will operate. If the school covers more than one county, then at least one member from each county board of education should be appointed.</p> <p>4.3.f. Charter schools should not be able to set student enrollment preferences. This allows the school to pick and choose candidates. If the charter school can pick and choose its students, then parents and students lose opportunities, which is the stated goal of this proposal. Student preference criteria should be directed from the state board of education and apply to all public and charter schools.</p> <p>4.3.i This should include a sentence that all professional and service personnel at a charter school must meet the minimum teaching requirements established for public school teachers. The purpose of this is to ensure qualified</p>	<p>N</p> <p>N</p> <p>N</p>	<p>Pursuant to W. Va. Code §18-5G-1 et seq., Policy 3300 establishes county boards of education as the sole charter school authorizers in West Virginia. Requiring county board of education members to serve on the governing boards of charter schools they authorize sets up a conflict of interest that would likely weaken the ability of county boards of education to hold charter schools accountable.</p> <p>Pursuant to W. Va. Code §18-5G-1 et seq., Policy 3300 establishes a limited set of potential student enrollment preferences based that emanate from code. Authorizers must agree to the enrollment preferences in the charter contract, and none of these preferences can advantage students based on high levels of prior achievement.</p> <p>Policy 3300 requires charter schools to obtain a criminal history check for all</p>

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		<p>personnel are around the students and ensures sufficient background checks and interviews are conducted (which increases the safety of the students).</p> <p>4.3.k. A statement should be added that student discipline can be no more sever than the policy governing students in the county where the school is located. This protects students from inappropriate disciplinary procedures designed to force students out of the school.</p> <p>4.3.l. In addition to zoning and safety laws, charter school facilities must be meet all standards established for schools as established by the WVDE.</p> <p>4.3.p. Nutritional standards should meet minimum federal standards and state standards if the state standard is better than the federal standard.</p> <p>4.3.q. Ethics standards can must meet state ethics standards as applied to public schools at a minimum.</p> <p>4.3.v. The notification must include a minimum of two direct mailings to all households in the service area to ensure all students and parents have the opportunity promised by this proposal.</p> <p>4.3.y. Add sentence that charter schools background checks must meet WVDE standards at a minimum.</p>	<p>N</p> <p>A/S</p> <p>A/C</p> <p>N</p> <p>N</p>	<p>personnel and governing board members. See Response 2 for additional details.</p> <p>Pursuant to W. Va. Code §18-5G-1 et seq., Policy 3300 allows charter schools to set their own student discipline policies. However, see Response 16 for more information about the requirement for authorizers to review student mobility, including for disciplinary reasons, to guard against commenter’s concern.</p> <p>Policy 3300 requires charter school facilities meet the same requirements as non-charter public schools. Policy 3300 now requires charter schools to meet state nutritional standards when they are stricter.</p> <p>Policy 3300 requires authorizers to evaluate charter school applications. In this role, authorizers can determine if ethics standards are sufficient.</p> <p>Policy 3300 requires authorizers to evaluate charter school applications. In this role, authorizers can determine if outreach efforts are sufficient.</p> <p>Policy 3300 requires charter schools to obtain a criminal history check for all personnel and governing board members. See Response 2 for additional details.</p>
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		<p>4.3.aa.3. A statement should be added that all debts to the state or county must be paid before all other debts are paid.</p> <p>4.5.d DO NOT CHANGE</p> <p>Other: There should be a requirement as part of the application for the charter to get county(s) boards of education to provide an impact statement on how the creation of the charter will effect student enrollment and school district finances in the effected geographic areas.</p>	<p>A/S</p> <p>N</p> <p>A/S</p> <p>A/S</p>	<p>In Section 8, Policy 3300 requires charter schools to satisfy outstanding payroll obligations prior to satisfying any creditors, including the state or county board of education, pursuant to W. Va. Code §18-5G-10(j)(2).</p> <p>In Section 7, Policy 3300 requires authorizers to consider how charter schools enrich and otherwise impact the educational opportunities in its jurisdiction in present and future years.</p>
1/13/20	Allyson	<p>Conversion charters process needs to change. Under the new policy, a survey is required of the parents, students, and staff regarding conversion. I believe that a threshold percentage of parents and staff who actually vote for conversion before a conversation can occur. A simple survey is not enough. Secondly, the language needs to be stronger to ensure locations and positions for both students and staff who choose not to remain at the school once it becomes a charter.</p>	<p>N</p> <p>A/C</p>	<p>See Response 22.</p> <p>Policy 3300 requires authorizers and charter schools to develop plans for students and staff who choose not to remain at the conversion charter school. Additional language has been added clarifying these responsibilities.</p>
1/13/20	Richard Morris	<p>Staffing plans, including certification/licensure must be included in the charter application. The only requirement in policy is that the criteria for hiring teachers should "demonstrate that individuals have relevant academic or occupational qualifications or experiences that reasonably indicate they will be competent to fill the positions in which they would be employed." I think the minimum requirements for teachers at charter should be at least what is in</p>	<p>A/S</p> <p>A/S</p>	<p>Policy 3300 requires staffing plans including required qualifications to be part of charter school applications.</p> <p>See Response 2 for relationship between charter school staff qualifications and those for alternative certification</p>

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		the other schools in the county.		teachers.
1/13/20	Dale Lee	4.3.i staffing qualifications and certification of employees in the charter should be required to match or exceed existing requirements of employees in our public schools. It should not be left to the whims of those completing the application. 4.3.t a process must also be spelled out for resolving disputes between employees, the governing board and the ESP	N A/C	See Response 2. Policy 3300 now includes a requirement that charter school applications include practices and processes covering grievances and due process for staff.
1/13/20	Elliott Kendle	The minimum requirement for teachers at a charter school should at least be what it is for teachers at other schools in the county.	A/S	See Response 2 for relationship between charter school staff qualifications and those for alternative certification teachers.
1/13/20	Rebecca Speakman	The idea of putting a child on a virtual charter as the main curriculum is nonsense. Virtual schools have proven to be ineffective and have shown failure all over the country. Virtual classes should be limited to one class per semester. All instructors should have a four year degree and, at minimum, one semester of teaching experience. There should be absolutely no legislator or school board member with a financial or personal stake in any charter school. Charters should not be able to use public school athletic fields, equipment, IT equipment or facilities. More users create more wear and tear on public school property. After further defending the public schools, charters should not be allowed to use the public school property!	A/C N A/S N	See Response 19. See Response 2. See Responses 4, 7, and 14. See Response 23.
1/13/20	Pamela JW Cain	4.3.c Please define “traditionally underperforming student”. Are you talking about SpED, families dealing with abuse/ drugs/ incarceration, or	A/C	Policy 3300 now includes a definition of the term that originated in W. Va. Code §18-5G-1 et seq. without definition.

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				<p>Policy 3300 requires authorizers and charter schools to plan for and agree to closure processes as part of the charter contract.</p> <p>See Response 14.</p>
1/13/20	<p>Jeremiah Underhill TITLE: Legal Director ROLE: Other Disability Rights of WV Charleston West</p>	<p>I. Section 4.3.e.1 regarding board members It should be required for a teacher/special education teacher/education specialist to be a member of the board to assist in informing policy and shaping curriculum.</p> <p>Section 4.3.f. regarding lottery for admission a. The lottery should not only be “transparent and random” but “non-discriminatory” as well, resulting in the following language “conducting a non-discriminatory, transparent and random admission lottery when necessary”</p>	<p>N</p> <p>N</p>	<p>Policy 3300 requires authorizers to review the qualifications of proposed board members as part of application review and are responsible for determining if the board has the requisite expertise to execute its responsibilities.</p> <p>Section 9 of Policy 3300 establishes the requirements for a random admission lottery and defines the conditions by which certain students may gain preference in the lottery. Within such preference groups, a random lottery will be non-discriminatory. Policy 3300 provides additional non-discrimination language throughout.</p>
1/14/20	<p>Sarah Reggi</p>	<p>4.3.b I am concerned about just how much time a charter school will be able to utilize virtual learning programs. To say that virtual programs shall not be full-time isn't restrictive enough. I do want charter schools substituting virtual classes for teachers of subjects that they can not hire and have in the classroom in person. WVDE should limit virtual learning.</p> <p>4.3.d.3 I am very concerned that while it looks like charter school students will take state mandated testing, it is left up to the charter school to decide</p>	<p>A/C</p> <p>N</p>	<p>See Response 19.</p> <p>Policy 3300 requires individual authorizers and charter schools to agree to the accountability plans for each charter</p>

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		<p>how the charter school will consider such accountability results in its specific accountability plan.</p> <p>4.3.i While the authorizer has the authority to authorize a charter, WVDE should set a statewide minimum for qualifications that have to be met for anyone to be a teacher at a "public" charter school. This minimum should include one semester of teaching experience and a four-year college degree. For professional staff, like physical therapists, occupational therapists, and speech-language pathologists, they should require to hold certifications and/or have state their state license.</p> <p>4.3.r "...the charter school will seek to contract with the authorizer and/or other service providers" to provide services to students with special educational needs, ELL, etc. - This concerns me. Will special education students and students with other areas of need be provided appropriate services to the same or better level as they receive in public school? Will public school providers (e.g. speech-language pathologists) be assigned to charter schools to fulfill their needs?</p> <p>4.5.o No legislator or school board member should have a financial or personal stake in a charter school. Campaign contributions from PACc, such as ALEC, should be counted as monetary contributions. Elected officials should be required to report any such contributions from charter corporations.</p>	<p>N</p> <p>A/C</p> <p>A/S</p> <p>N</p>	<p>school so that the plan is tailored to the charter school's educational mission. Charter schools do not set their own accountability plan.</p> <p>See Response 2.</p> <p>See Response 15.</p> <p>See Responses 4, 7, and 14.</p> <p>See Response 24.</p>
1/14/20	Terri Engnoth	While the authorizer has the authority to authorize	A/S	See Response 2.

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		<p>a charter, WVDE will set a statewide minimum for qualifications that have to be met for anyone to be a teacher at a "public" charter school. This minimum will include one semester of teaching experience and a four-year college degree.</p> <p>Transportation must be addressed in the application. It is always applicable. If transportation is not provided, only students with access to personal transportation will attend. This is socioeconomic segregation.</p> <p>Open Enrollment is already law, but Policy 3300 must clearly state that the transportation funding charters receive will be used to transport charter school students at the charter schools expense, not the countys.</p> <p>This policy state, "students who do not remain at the conversion charter school, for reasons including but not limited to lack of transportation, etc., will enroll in other schools." Students will not be removed from their local school due to lack of transportation.</p> <p>Campaign contributions from PACs, such as ALEC, shall be counted as monetary contributions. Elected officials must report any contributions from charter corporations. No legislator or school board member shall have a financial or personal stake in a charter school.</p> <p>WV Code §18-5G-12. includes nothing about leasing and using athletic fields, sports equipment,</p>	<p>N</p> <p>N</p> <p>N</p> <p>N</p> <p>N</p>	<p>See Response 9.</p> <p>See Response 9.</p> <p>See Response 22.</p> <p>See Response 14.</p> <p>See Response 23.</p>
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		or IT equipment. Given the cost of sports and IT equipment, more users will cause more wear and tear, and schools cannot quickly replace equipment.		
1/14/20	Ashley Ramsden	Does not specify non-discrimination based on federal non-discrimination guidelines.	A/C	Policy 3300 already included a provision prohibiting discrimination by charter schools that would be unlawful for non-charter public schools. Policy 3300 now includes additional language clarifying this includes state and federal law as well as carving out an exception for the allowed enrollment preferences established in W. Va. Code §18-5G-1 et seq.
1/14/20	Leah Earle	No charter schoolsn	N	Duplicate comment from Section 1.
1/14/20	Tim Hardesty	<p>Include the requirement of how the vision and mission would be implemented at the school.</p> <p>Include that the educational program be based on state standards and include an emphasis on reading.</p> <p>Add that the 30 days would be a onetime opportunity for the charter applicant to provide additional information for consideration in the application process.</p> <p>The feedback on the charter school application should provide basic deficiencies without specific details that result in the district rewriting the proposed charter application.</p>	<p>A/S</p> <p>A/S</p> <p>A/C</p> <p>A/C</p>	<p>Comments support Policy 3300, Sections 5, subsections 5.4.b.1.A.1, 5.4.b.1.A.2, and 5.4.b.1.A.3.</p> <p>More specific language was added to clarify Section 5, subsection 5.3.b.4.</p> <p>More specific language was added to clarify Section 5, subsection 5.3.b.4.</p>
1/14/20	Jedd Flowers	<ul style="list-style-type: none"> •Include the requirement of how the vision and mission would be implemented at the school. •Include that the educational program be based on 	<p>A/S</p> <p>A/S</p>	<p>...</p> <p>Comments support Policy 3300, Sections 5, subsections 5.4.b.1.A.1, 5.4.b.1.A.2, and 5.4.b.1.A.3.</p>

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		<p>state standards and include an emphasis on reading.</p> <ul style="list-style-type: none"> •Add that the 30 days would be a onetime opportunity for the charter applicant to provide additional information for consideration in the application process. •The feedback on the charter school application should provide basic deficiencies without specific details that result in the district rewriting the proposed charter application. 	<p>A/C</p> <p>A/C</p>	<p>More specific language was added to clarify Section 5, subsection 5.3.b.4.</p> <p>More specific language was added to clarify Section 5, subsection 5.3.b.4.</p>
1/14/20	John Treu	For consistency, I recommend adopting the terms “charter public school” and “non-charter public school” throughout Rule 3300 as this is the terminology adopted in the statute (see e.g. W. Va. Code § 18-5G-1).	N	Duplicate comment from Section 3.
1/14/20	Mark Swiger	<p>If charter schools are truly “public charters” and are governed by the free public schools of our state and by duly elected school boards, why aren our school boards enough to govern charters?</p> <p>If these are private schools that are called public charters, we need to continue to be concerned that this isn simply an attempt at privatizing public monies earmarked through our county property taxes and state funds for public free schools. Private schools already exist with their separate boards. ELECTED school boards should administer the distribution and deployment of county and state education funds. Period. Unelected and appointed charter boards sound to me as self-serving boards. There is plenty of research out there that shows an increased possibility of fraud of</p>	N	Pursuant to W. Va. Code §18-5G-1, et. seq., Policy 3300 places responsibility for authorization, and hence oversight, of charter schools in the hands of county boards of education. The governing board is responsible for charter school operations but remains accountable to the county school board.

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		<p>public monies under the guise of public charters.</p> <p>Yearly audits of funds distributed for public charters needs to be made public to make sure that the peoples money is being administered as appropriated by the legislature and our county commissions. These audits should include the same things that public audits of public schools show.</p> <p>Recent data shows that charters and school choice have segregated our schools in both racial and classist ways by providing more opportunity to more affluent and suburban/urban students. There should be special care taken to provide equal access to quality education and resources, per the Recht Decision. Brown v. Topeka stressed that separate is NOT equal. Although talent is dispersed evenly throughout our state opportunity never has been distributed that way. Charter schools seem to be validating that it is quite alright to separate based on affluence.</p> <p>Since 1974 and Public Law 94-142, school district challenges to provide students with the least restrictive environment for a thorough and efficient education has been confronted with financial constraints. We haven gotten to the point where the law was sufficiently served, but we were constantly moving in that direction. I fear the public charters while increasing autonomy (not a bad thing) for public charters will have the unintended consequence of making financial resources that build equity, justice, and fairness into our schools less accessible by creating a top-heavy structure in</p>	<p>A/S</p> <p>N</p> <p>N</p>	<p>See Response 8.</p> <p>See Response 6.</p> <p>See Responses 1 and 3.</p>
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		<p>public charters.</p> <p>I stand by the fact that I believe that this is a redistribution of wealth from rural to urban/suburban districts and is in violation of the Recht Decision.</p>		
1/14/20	Renee Mahon	There should be very strict standards and they should be held to the same standards as public schools. There should be more alternative schools, not charter schools.	A/S N	See Response 11. See Response 5.
1/14/20	Courtney Martin	Charter schools should not be permitted to use existing school facilities, especially operational non-charter public schools.	N	Pursuant to W. Va. Code §18-5G-1, et. seq., Policy 3300 allows charter schools to use existing school facilities only when they are unused by the county board of education.
1/14/20	John Connor	4.3.i. I am concerned about the ambiguity of the qualifications to be required of teachers and other instructional staff, and I believe that students of public charter schools should be afforded an education provided by certified teachers who have graduated from an accredited teacher preparation program and are certified in the subject area they are instructing.	N	See Response 2.
1/14/20	Michelle L Connor	<p>4.3.b Since virtual schools have historically had more challenges than non-virtual charter schools, there should be a cap on the amount of instruction that can be provided by virtual instruction. Not being a full-time virtual school is too ambiguous. The cap should be well defined and should not exceed 20%.</p> <p>4.3.e.1.A and §.3.e.1.B These need to be four separate and distinct people, not one in the same i.e. the parents can not also be the community</p>	A/C A/C	See Response 19. Policy 3300 now clarifies that no single board member can count in both roles.

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		representatives. 4.3.h They must have an annual audit by an independent CPA or auditing firm and make that audit publicly available to the County BOE, parents of the school, and community at-large, including the amounts of salaries, wages, and employment contracts.	A/S	See Response 8.
§126-79-5. Charter School Application Process.				
11/15/19	Mary Deskins	I am opposed to charter schools. If WV must have them, the school must have a way to ensure they will stay open the whole school year, use only teachers with at least a bachelor's degree, provide teachers will pay equal to at least the same as the public school teachers in that zip code, institutionalize an audit system that confirms the number of students actually enrolled and attending, be required to have buildings that meet the same safety and comfort standard as the public schools in that zip code, and not allow for-profit businesses to be hired or used for that school.	N	Duplicate comment from Section 1.
11/17/19	Kim Kelly	I am a parent, and I do not want funds for charter schools taken from my daughter's public school.	N	Duplicate comment from Section 1.
11/17/19	Rondalyn Whitney	No to charters	N	Duplicate comment from Section 2
11/18/19	Lisa Weihman	I do not want money that should be going to our public schools used to charter schools. I am sickened that there are legislators in Charleston buying up property and scheming to turn charter schools into private slush funds. The graft and unethical behavior of our legislators in passing this mess is evident to many of us.	N	Duplicate comment from Section 1.
11/20/19	Jason M. Barr	I do NOT want any form or incarnation of charter schools in West Virginia	N	Duplicate comment from Section 1.
11/20/19	Julie Yearego	5.2.c.2.D - Serve students with particular interests	N	See Responses 1 and 4.

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		<p>or career interests. Currently, public education in WV has been recognizing the value in Career & Technical Education which extends from IT/Business/Health Occupations to Welding/Auto Tech/Carpentry. Some of these programs of study are offered at regional technical centers, while others are offered at area high schools. More students should be made aware of these offerings beginning at middle school to assist students with career preparation. Where I do see an opportunity for public education to expand their offerings to address student interests/career interests, for example in the Arts, where smaller schools may not have the staff would be to have regional concentrations within local high schools or technical centers that focus and students earn credits aligned more closely or embedded within their courses. For instance, reading and math credits with a STEM, STEAM or Arts Cluster courses that incorporate both within their normal training. Again, these types of embedded credits are already in use at our public technical centers. There is limited funding in our small state, why we are not expanding what we have or better "advertising" these options to our existing students, instead of the huge costs of opening entirely new schools is a burden that WV taxpayers need not bear.</p>		
11/20/19	Geraldine	<p>The application process lacks accountability and does not require the applicants to have any experience in education. This opens it up to corporations and those who do not have a genuine interest in educating the children in WV.</p>	N	<p>Policy 3300 requires authorizers to evaluate the extent to which applicants have identified governing board members and key school staff with the necessary educational experience or expertise to successfully execute on the proposed mission of the charter school and meet</p>

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				the accountability measures of success. Additionally, charter schools that will engage education service providers to operate charter schools in West Virginia are required to demonstrate the past success of said providers.
11/23/19	Ashlee Curtis	Please see the comment above.	N	Duplicate comment from Section 1.
11/25/19	Laura Perry	Waste of money	N	Duplicate comment from Section 1.
11/25/19	Gibson Terrell	Charters funnel tax money to private businesses. This should be illegal. WV politicians are greedy and they don't want to provide health insurance or retirement programs so they want to outsource education.	N	Duplicate comment from Section 1.
11/26/19	Anh Alderton	Free and easy access.	A/S	See Response 6.
12/3/19	Theodore Webb	a charter needs to PROVE its public! does it Bus students to school? yes or no?! and what is stopping a charter from closing down during mid school year like happened in Michigan leaving students in the cold? no charter should be approved that cannot PROVE it is not financially solvent for Certain through entire school year. it should have to PROVE by accredited economic financial standards it will be solvent for 10 years at least, there should be at least \$10 million in reserve for each school to compensate if it closes or help students find another school	N	Duplicate comment from Section 4.
12/10/19	Renee Mahon	I do not like the fact that pretty much anyone can apply to become a charter school. I do not like charter schools and at. 88% of West Virginians do not want charter schools. The state department needs to step up and tell the legislators we do not want this at all.	N	While charter school applications are open to any person or group who has begun the process of forming a 501(c)(3), authorizers must evaluate whether the applicant has formed an initial board that has the requisite experience and expertise to operate a charter school and must also evaluate the qualifications of any

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				identified staff or the plan to identify staff including school leaders to ensure they have the appropriate expertise.
			N	See Response 1.
12/12/19	Nelson Smith	<p>126-79-5.2.b.: While it makes sense for authorizers to have some flexibility in tailoring application processes to local circumstances, we know that some authorizers have used that flexibility to include frivolous or burdensome requirements on applicants. Since they will post these forms on district websites, transparency should keep such mischief to a minimum – but the State Board should monitor “addenda” and be prepared to question any application process that smacks of hostility to charter applicants or otherwise frustrates the intent of statute.</p> <p>5.4.b. : As written, this section on evaluation of charter applications really just lists the categories the application should include, along with a qualifying word or two (“comprehensive,” “thoughtful,” etc.) This is not the place to incorporate extensive evaluation criteria for each item, but the intro could make clearer that WVDE will publish model rubrics that the authorizer can use to judge each item in the application.</p>	A/C	Language has been clarified in Policy 3300.
			A/C	Policy 3300 was amended to clarify that the WVDE will create a rubric for evaluating each criteria listed and train authorizers on how to apply the rubric.
12/21/19	Cheryl Cain	<p>“Studies on for-profit schooling in Africa and Asia show that for-profit providers fall short of meeting educational standards. For example, in Kenya and Uganda, Bridge International, Academies a US-based international education business runs k-12 schools where they employ unqualified teachers, strictly directing their performance in the classroom through standardized scripts.” -American</p>	N	Duplicate comment from Section 2.

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		Educator Winter 2019-20		
12/28/19	Andrew	Everyone on the charter school board members should be required to put up a \$10,000 bond personally. The charter school should be required to put up a \$200,000 bond. This would ensure if the charter school becomes defunct, tax payers and the school system will get both bonds to cover the cost for returning students.	A/C	Response 25: Policy 3300 now requires the governing board to ensure key financial officers of the charter school are bonded based on the requirements for equivalent positions at the county board of education level, which are contained in WVBE Policy 8100.
12/29/19	Chrystalle Doyle	It isn't right to remove students from a conversion school because they have no transportation. The money for transportation is on the funding formula. They should have to provide the same as public schools. This is a segregation method.	N	See Response 9.
1/2/20	Tanya	This part of the process is ridiculous! Why should a county boe explain over and over why a proposed school does not benefit the county or students? Totally backwards!! If a new organization can prove their ability, okay, but why penalize a county for denial? To make it harder to keep tax monies in public schools is to promote fraud! Shameful!	N	Policy 3300 requires charter school applicants demonstrate vision and capacity across a range of topics based on national standards for charter school authorizing. The policy aims to set a high bar for applicants to meet in order to win approval from authorizers (county boards of education).
1/3/20	Shawn Wright	We were told that the counties would have final say, however it is not written that way in the bill. Once again ccitizens were lied to, bynour elected officials.	N	Pursuant to W. Va. Code §18-5G-1, et. seq., Policy 3300 establishes county boards of education as the sole authorizers for charter public schools in West Virginia, except in specific instances when the WVBE acts in that role.
1/4/20	Leslie Haynes	While the application should be comprehensive, asking an authorizer to review and render a decision, with all requirements, within three months, is unreasonable. Additional personnel will most likely need to be employed to meet that deadline. Holding public forums on short notice is beyond challenging. Further, an applicant may	N	Policy 3300 establishes the timeline for the application and application evaluation process based on the deadlines outlined in W. Va. Code §18-5G-1, et. seq. Policy 3300 clarifies these timelines by establishing clear annual dates for each step in the process rather than requiring tracking the

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		submit an incomplete application and be permitted a grace period to complete the application, but failure of an authorizer to meet a deadline results in conditional approval of the charter application. This hardly seems comparable. Deadlines for completion must be deadlines for completion.	A/C	number of days since a prior event. This should clarify the process for all involved. Policy 3300 has been updated to clarify that while authorizers must provide 30 days for an applicant to address deficiencies, applications that are incomplete or grossly deficient may be denied without the 30-day response period.
1/5/20	Millie Stoneking	Survey conducted to regarding creation of a charter school should have a threshold percentage of parents and staff not just conducting a survey.	N	See Response 22.
1/7/20	Tracy Harlan	Regardless of how you utilize this, you will find that parents without the ability to complete applications, parents of students with disabilities, parents without transportation, or parents without financial funding will be left behind.	N	See Responses 6 and 9.
1/7/20	Jeremy	CHARTER	N	See Response 1.
1/10/20	Travis Wells	By placing this responsibility on the local BOE it gives out of state charter corporations reason to pour money into our local elections, effectively changing the dynamics of the BOE from a locally democratically controlled body, to a apparatus for out of state interest.	N	Policy 3300 establishes county boards of education as the sole charter school authorizers, pursuant to W. Va. Code §18-5G-1, et seq., and provides rules to guide authorizing practice based on national standards and successful and unsuccessful authorizing practices elsewhere. Beyond existing provisions around standards for authorization, the WVBE cannot address the comment as it does not have the authority to address campaign finance restrictions or reporting.
1/10/20	Dr. Carole Garrison, PhD	Application revisions should be clearly the on the applicant and NOT on the relevant school district!	A/S	Policy 3300 places the responsibility for completing an application that meets the standards for approval on the charter

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				school applicant, not the county board of education.
1/12/20	Jay O'Neal	<p>5.4.b.1.B.5 -- Are charters REQUIRED to provide transportation? If not, then this is socioeconomic discrimination, as we know many poor families do not have their own means of transportation.</p> <p>5.4.c.4.B -- If a school converts, are students without transportation forced to go to another school? Again how is this not socioeconomic discrimination. Charters should be forced to provide transportation to ALL their students-- and must reimburse local county boards for any use of school buses, etc, for that transportation.</p> <p>5.5.d.4 - So inaction by a county authorizer means a charter is automatically authorized? What about oversight from the WVBE? Does this mean someone could potentially submit a blank application and still be approved if their county board did nothing? This needs to be much stricter.</p>	N N A/C	<p>See Response 9.</p> <p>See Response 9.</p> <p>Policy 3300 has been updated to clarify that while authorizers must provide 30 days for an applicant to address deficiencies, applications that are incomplete or grossly deficient may be denied without the 30-day response period.</p>
1/12/20	Jennifer Craig	<p>start up plan- if these are truly public charters, transportation should be REQUIRED - if transportation is not a requirement only students with access to personal transportation will be able to attend- this is socio economic SEGREGATION</p> <p>5.4.c.4.b- conversion- if a public school converts to a public charter school the authorizer must consider how to accommodate students who cant remain (due to lack of transportation, specialized needs etc) no mandates or requirements are outlined to protect these students -- if the 90% of</p>	N N	<p>See Response 9.</p> <p>See Responses 9 and 22.</p>

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		per pupil funding that goes to charters includes transportation costs why are they not required to provide it?		
1/13/20	Allyson	Staffing plans, including certification/licensure must be included in the charter application. The only requirement in policy is that the criteria for hiring teachers should "demonstrate that individuals have relevant academic or occupational qualifications or experiences that reasonably indicate they will be competent to fill the positions in which they would be employed." I think the minimum requirements for teachers at charter should be at least what is in the other schools in the county.	A/S	See Response 2.
1/13/20	Richard Morris	Conversion charters process needs to change. Under the new policy, a survey is required of the parents, students, and staff regarding conversion. I believe that a threshold percentage of parents and staff who actually vote for conversion before a conversation can occur. A simple survey is not enough. Secondly, the language needs to be stronger to ensure locations and positions for both students and staff who choose not to remain at the school once it becomes a charter.	N	See Response 22.
1/13/20	Dale Lee	5.4.c.3.A The term "sufficient demand" is far too objective. What qualifies as 'sufficient demand' and how is that to be determined? 5.4.c.4.A "A survey" is not enough for the decision to convert a school to a charter. A monitored vote of parents and staff with an affirmative vote of 75% or above should be required for a conversion school. 5.4.c.4.B A plan must also be included to spell out	A/C N A/S	Policy 3300 now includes additional description of sufficient demand. See Response 22.

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		<p>how the staff that is not selected or chooses not to work at the charter will be handled. What are their options and how does that impact other county schools and employees?</p> <p>5.7.a the WVDE should ensure that every application approved by local boards meet the minimum quality standards. In the current policy that only occurs after the 3-school limit is achieved in any given year and a ranking occurs.</p>	N	<p>Pursuant to W. Va. Code §18-5G-1, et. seq., requires county boards of education, as authorizers, to evaluate the quality of each application in demonstrating that the charter school will fulfill its educational mission and improve student outcomes.</p>
1/13/20	Elliott Kendle	<p>There should be a vote and a threshold percentage of parents and staff who actually vote before a conversion can take place. A simple survey is not enough. The language also needs to be stronger to ensure positions for students and staff who choose not to remain at the school when it becomes a charter.</p>	N	See Response 22.
1/13/20	Rebecca Speakman	<p>If free transportation is not offered to a charter school, this will segregate lower socioeconomic families and is unacceptable. A charter school should be required to offer free transportation. Part of the per pupil spending that the charter receives from public schools will include transportation costs; therefore, the charter school should be required to provide transportation.</p>	N	See Response 9.
1/13/20	Pamela JW Cain	<p>5.3.b.3 Public needs more than just a forum - they need to vote. Plus forums must be within easy reach of all citizens and have at least 2 - one in morning and one in evening to accommodate stakeholders.</p> <p>Again... Why are Charter organizations consulted regarding evaluation criteria. This is supposed to be</p>	N	See Response 22.

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		<p>for WV, not big business.</p> <p>5.4.b.1.A. Charter standards must be above WVCCRS - Isn that why legislators put this in place (because public schools are not doing enough?)</p> <p>5.4.b.1.A.7 Charters need to be required to provide supplemental programs - especially athletics, after-school, and summer school in order to serve their student. There should be no "election" to offer.</p> <p>5.4.b.1.A.8 Charters should be required to provide SLP, OT/ PT, SpEd teacher/aides, etc at the same level or greater than public schools. and they need to aggressively advertise these options.</p> <p>5.4.b.1.A.10 Discipline needs to be organized in such a way that SpEd and other health impaired students are not dis-advantaged. "Protecting rights" is not strong enough terminology.</p> <p>5.4.b.1.A.13 -- no conversions unless families vote "yes" by 2/3rds.</p> <p>5.4.b.1.B.2 -- no language on degrees/ certification for teachers/ support personnel</p>	<p>A/S</p> <p>N</p> <p>A/C</p> <p>A/S</p> <p>N</p> <p>N</p>	<p>Policy 3300 section 5.4.b.1.A.3 explains that a detailed explanation for how deviation from the West Virginia College- and Career-Readiness Standards exceed the rigor of those standards if a charter application proposes to address standards other than the WVCCRS.</p> <p>See Response 15.</p> <p>In establishing this criterion for evaluation, Policy 3300 provides authorizers with the opportunity to evaluate with the proposed discipline policy is likely to meet the stated goal based on the research or other evidence supporting the proposed discipline policy.</p> <p>See Response 22.</p> <p>See Response 2.</p>
1/13/20	Jeremiah Underhill	<p>Section 5.4.b.1.A.10</p> <p>a. Student Discipline: I propose changing “thorough discipline policy” to “thorough discipline policy involving graduated sanctions”</p> <p>b. Graduated sanctions are supported by research and tend to be less alienating to all students, increasing the likelihood of school engagement</p>	A/S	<p>In establishing this criterion for evaluation, Policy 3300 provides authorizers with the opportunity to evaluate with the proposed discipline policy is likely to meet the stated goal based on the research or other evidence supporting the proposed discipline policy.</p>

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		<p>schools. It is also concerning to read that charter have transportation funding, but don have to provide transportation. If transportation is not provided, only students with access to personal transportation will attend. This is socioeconomic segregation.</p> <p>5.5.d.4 I disagree that failure of an authorizer to render a decision on a charter application results in a conditional approval of the application.</p>	N	See Response 1.
1/14/20	Ashley Ramsden	Does not specify non-discrimination based on federal non-discrimination guidelines.	A/C	Duplicate comment from Section 4.
	Leah Earle	No charter schools	N	Duplicate comment from Section 1.
1/14/20	Tim Hardesty	<p>The Education Program Overview only includes how the charter will achieve the mission. It should also include the vision as required in 4.3.a. - P.3.</p> <p>There is no requirement to specifically address the reading curriculum and how the charter applicant will support effective reading instruction. An outline of the curriculum will not provide enough detail to determine the basis for instruction.</p> <p>Add the requirement to include a school culture and safety plan.</p> <p>Add the word “proven” innovative educational methods.</p> <p>Criteria for reviewing charter school applications references W.Va. Code 18-5G-6(b)(6) This code was not found - believe it should reference W.Va. Code 18-5G-4</p>	<p>A/C</p> <p>N</p> <p>A/S</p> <p>N</p> <p>N</p>	<p>Policy 3300 now reflects the suggested change.</p> <p>See Response 1. Policy 3300 requires authorizers to evaluate charter school applicant’s proposed educational programming plan.</p> <p>Policy 3300 requires authorizers to evaluate these components as part of the application as explained in sections 5.4.b.1.A.6 and 5.4.b.1.B.5 address school culture and student safety.</p> <p>See Response 1. Policy 3300 requires authorizers to evaluate charter school applicant’s proposed educational programming plan.</p> <p>The reference to W. Va. Code §18-5G-6(b)(6) is accurate. Additional language added that references the delegation for</p>

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		<p>All codes will need to be verified.</p> <p>On initial application timeline, require charter applicant to notify the authorizer in writing when all items for review have been submitted.</p> <p>Also on initial application timeline, how does the 30 days allocated for applicants to provide additional information impact the requirement for contract approval in 90 days? (5.3.b.4-P.10)</p>	<p>N</p> <p>A/C</p> <p>A/C</p>	<p>the definition of evaluation criteria to the WVBE per W. Va. Code §18-5G-4.</p> <p>The meaning of the comment is unclear. Policy 3300 requires a single submission with signed confirmation that application is complete.</p> <p>Policy 3300 now contains a clarified timeline.</p>
1/14/20	Ryan Saxe	<p>The Education Program Overview only includes how the charter will achieve the mission. It should also include the vision as required in 4.3.a. - P.3.</p> <p>There is no requirement to specifically address the reading curriculum and how the charter applicant will support effective reading instruction. An outline of the curriculum will not provide enough detail to determine the basis for instruction.</p> <p>Add the requirement to include a school culture and safety plan.</p> <p>Add the word “proven” innovative educational methods.</p> <p>Criteria for reviewing charter school applications references W.Va. Code 18-5G-6(b)(6) This code was not found - believe it should reference W.Va. Code 18-5G-4</p> <p>All codes will need to be verified.</p> <p>On initial application timeline, require charter</p>	<p>A/C</p> <p>N</p> <p>N</p> <p>N</p> <p>N</p> <p>A/C</p>	<p>Policy 3300 now reflects the suggested change.</p> <p>See Response 1. Policy 3300 requires authorizers to evaluate charter school applicant’s proposed educational programming plan.</p> <p>Policy 3300 requires authorizers to evaluate these components as part of the application as explained in sections 5.4.b.1.A.6 and 5.4.b.1.B.5 address school culture and student safety.</p> <p>See Response 1. Policy 3300 requires authorizers to evaluate charter school applicant’s proposed educational programming plan.</p> <p>Sections 5.4.b.1.A.6 and 5.4.b.1.B.5 address school culture and student safety.</p> <p>The reference to W. Va. Code §18-5G-</p>

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		<p>applicant to notify the authorizer in writing when all items for review have been submitted.</p> <p>Also on initial application timeline, how does the 30 days allocated for applicants to provide additional information impact the requirement for contract approval in 90 days? (5.3.b.4-P.10)</p>	A/C	<p>6(b)(6) is accurate. Additional language added that references the delegation for the definition of evaluation criteria to the WVBE per W. Va. Code §18-5G-4. The meaning of the comment is unclear.</p> <p>Policy 3300 requires a single submission with signed confirmation that application is complete.</p> <p>Policy 3300 now contains a clarified timeline.</p>
1/14/20	Jedd Flowers	<ul style="list-style-type: none"> •The Education Program Overview only includes how the charter will achieve the mission. It should also include the vision as required in 4.3.a. - P.3. •There is no requirement to specifically address the reading curriculum and how the charter applicant will support effective reading instruction. An outline of the curriculum will not provide enough detail to determine the basis for instruction. •Add the requirement to include a school culture and safety plan. •Add the word “proven” innovative educational methods. •Criteria for reviewing charter school applications references W.Va. Code 18-5G-6(b)(6) •This code was not found - believe it should reference W.Va. Code 18-5G-4 	<p>A/C</p> <p>N</p> <p>N</p> <p>N</p> <p>N</p>	<p>Policy 3300 now reflects the suggested change.</p> <p>See Response 1. Policy 3300 requires authorizers to evaluate charter school applicant’s proposed educational programming plan.</p> <p>Policy 3300 requires authorizers to evaluate these components as part of the application as explained in sections 5.4.b.1.A.6 and 5.4.b.1.B.5 address school culture and student safety. See Response 1. Policy 3300 requires authorizers to evaluate charter school applicant’s proposed educational programming plan.</p> <p>The reference to W. Va. Code §18-5G-6(b)(6) is accurate. Additional language</p>

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		<ul style="list-style-type: none"> •All codes will need to be verified. •On initial application timeline, require charter applicant to notify the authorizer in writing when all items for review have been submitted. •Also on initial application timeline, how does the 30 days allocated for applicants to provide additional information impact the requirement for contract approval in 90 days? (5.3.b.4-P.10) 	<p>N</p> <p>A/C</p> <p>A/C</p>	<p>added that references the delegation for the definition of evaluation criteria to the WVBE per W. Va. Code §18-5G-4.</p> <p>The meaning of the comment is unclear.</p> <p>Policy 3300 requires a single submission with signed confirmation that application is complete.</p> <p>Policy 3300 now contains a clarified timeline.</p>
1/14/20	John Treu	<p>Rule 5.4.c.2.A appears to be inconsistent with the overall intent and purpose of W. Va. Code § 18-5G-1 et. Seq. as requiring compliance with this rule would excessively limit the overall scope and purpose of West Virginia Public Charter Schools. The pertinent language at the beginning of 5.4.c combined with 5.4.c.2.A reads as follows:</p> <p>“5.4.c In evaluating charter school applications, authorizers shall consider the following criteria based on the intent outlined in W. Va. Code Sec. 18-5G-1:</p> <p>5.4.c.2 Identified need.</p> <p>5.4.c.2.A A rational for establishing the charter school that aims to better serve groups of students – characterized by geography, socio-economic state, other demographic attributes, special needs, etc. – in the local school district(s) who have been historically underserved.”</p> <p>If this rule were interpreted by authorizers as a requirement for a successful charter application,</p>	N	<p>This provision (5.4.c.2.A) of Policy 3300 emanates directly from W. Va. Code §18-5G-8(b)(5), which requires charter school applications to explain “how the proposed program is likely to improve the achievement of traditionally underperforming students in the local school district.” The phrase “traditionally underperforming” has been included next to “historically underserved” to avoid any confusion that all public schools have a responsibility to address the needs of underserved and underperforming students to the extent they differ.</p>

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		<p>such requirement would go far beyond the intent of the statutory language in limiting the scope and aim of charter schools and would eliminate all other rationales for organizing a charter school beyond serving historically underserved groups. While the statutory language does require the application address how the school’s proposed program is likely to improve the achievement of “traditionally underperforming students” in the local school district (see W. Va. Code Sec. 18-5G-8(b)(5)), the description of “historically underserved” students in this rule is not consistent with that statute and draws a false equivalence between “traditionally underperforming” and “historically underserved.”</p> <p>I recommend deleting rule 5.4.c.2.A and revising Rule 5.4.c.2.B (renumbered as 5.4.c.2.A) to be more consistent with the statutory language and intent as follows:</p> <p>5.4.c.2.A A clear explanation of how the educational mission and plan of the school will address the needs of traditionally underperforming students, pursuant to W. Va. Code § 18-5G-8(b)(5).</p> <p>To the extent that a rule similar to the existing Rule 5.4.c.2.A is retained, at a minimum it should be revised to make it clear that the rule is not imposing an additional requirement for a successful application and it should be further revised to eliminate the false equivalence between “traditionally underperforming” and “historically</p>		
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		underserved” to avoid inconsistency. Also, for consistency, I recommend adopting the terms “charter public school” and “non-charter public school” throughout Rule 3300 as this is the terminology adopted in the statute (see e.g. W. Va. Code § 18-5G-1).	N	Duplicate comment from Section 3.
1/14/20	Tonya Stuart Rinehart	If charters do not provide transportation (which they are required to by code, then this leaves economically disadvantaged students without an opportunity to attend charters. Therefore allowing charters to “cherry pick” which students comprise their population.	N	See Response 9.
1/14/20	Renee Mahon	I do like the fact that the county BOE, staff and parents have a say so as to if a school should start. It should be in writing that if staff and parents say no, that the county BOE says no. The County BOE should not have more power in the decision than anyone else.	A/S N	See Response 22.
§126-79-6. Charter Contract.				
11/15/19	Mary Deskins	I am opposed to charter schools. If WV must have them, the school must have a way to ensure they will stay open the whole school year, use only teachers with at least a bachelor's degree, provide teachers will pay equal to at least the same as the public school teachers in that zip code, institutionalize an audit system that confirms the number of students actually enrolled and attending, be required to have buildings that meet the same safety and comfort standard as the public schools in that zip code, and not allow for-profit businesses to be hired or used for that school.	N	Duplicate comment from Section 1.
11/16/19	Misty Key	Charter school benchmark assessments should be highly monitored by the BOE. There will extreme	A/C	Policy 3300 now explicitly requires, in Section 4, charter schools to use the same

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		pressure for these charter schools to perform. The BOE should monitor all aspects of testing so no cheating occurs.		assessment protocols for statewide summative assessments as non-charter public schools. Pursuant to W. Va. Code §18-5G-1, et seq., Policy 3300 does not include any requirements for charter schools to use benchmark assessments, though an authorizer and a charter school could include the use and protocols for administering benchmark assessments in their charter contract.
11/17/19	Kim Kelly	I am a parent, and I do not want funds for charter schools taken from my daughter's public school.	N	Duplicate comment from Section 1.
11/17/19	Rondalyn Whitney	No to charters	N	Duplicate comment from Section 2
11/18/19	Lisa Weihman	I do not want money that should be going to our public schools used to charter schools. I am sickened that there are legislators in Charleston buying up property and scheming to turn charter schools into private slush funds. The graft and unethical behavior of our legislators in passing this mess is evident to many of us.	N	Duplicate comment from Section 1.
11/20/19	Jason M. Barr	I do NOT want any form or incarnation of charter schools in West Virginia	N	Duplicate comment from Section 1.
11/23/19	Ashlee Curtis	Please see the comment above.	N	Duplicate comment from Section 1.
11/25/19	Laura Perry	Waste of money	N	Duplicate comment from Section 1.
11/25/19	Gibson Terrell	Charters funnel tax money to private businesses. This should be illegal. WV politicians are greedy and they don't want to provide health insurance or retirement programs so they want to outsource education.	N	Duplicate comment from Section 1.
12/10/19	Renee Mahon	Whoever decides to start a charter school needs to ensure and put in writing that they will not take money from public schools in any way shape or form and either charger tuition like a private school or fund the school themselves. There should be	N N	See Response 3. Pursuant to W. Va. Code §18-5G-1, et seq.,

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		School Counselors provided in each school so mental health services can be provided to students. There should be a school nurse in every school to attend to health needs.		Policy 3300 grants charter schools autonomy over personnel decisions. However, charter schools must have a plan and capacity to provide services required by IDEA, Section 504, and other applicable federal law. Additionally, authorizers must evaluate whether staffing plans will proposed in charter school applications adequately meet the needs of children in order to deliver improved student outcomes and ensure open access to all interested students.
12/21/19	Cheryl Cain	“Studies on for-profit schooling in Africa and Asia show that for-profit providers fall short of meeting educational standards. For example, in Kenya and Uganda, Bridge International, Academies a US-based international education business runs k-12 schools where they employ unqualified teachers, strictly directing their performance in the classroom through standardized scripts.” -American Educator Winter 2019-20	N	Duplicate comment from Section 2.
1/2/20	Tanya	The worst part of this monstrosity! It is completely backwards. Charter schools should justify the need, and demonstrate how they will help my children.	N	Policy 3300 establishes the criteria that charter school applicants must satisfy to win approval from an authorizer. Throughout this process, the burden to demonstrate the ability the execute on their educational mission lies on the charter school applicant.
1/3/20	Shawn Wright	Between the county first, the citizens second & finalize with the state last.	N	Pursuant to W. Va. Code §18-5G-1, et seq., Policy 3300 establishes the purpose, process, and requirements for the charter contract between the charter school governing board and the authorizer (county board of education).

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1/4/20	Leslie Haynes	The term of an initial charter contract should be 3 years. Success or failure can be determined within 3 years. Does the authorizer hold the contract?	N	Pursuant to W. Va. Code §18-5G-1, et seq., Policy 3300 limits charter contracts to no longer than five years. The exact length of the contract will be determined by the parties to the contract (charter school governing board and authorizer).
1/7/20	Jeremy	SCHOOLS	N	See Response 1.
1/8/20	Madelyn Fisher	Horrible	N	See Response 1.
1/12/20	Jay O'Neal	How about an addition asking the charter to clarify how much of its funds are going to private, outside service providers? The charter should list how much money it is sending to for-profit entities to help provide services to the school.	A/S	Comment supports Policy 3300 Section 11.3, Reporting Requirements for ESPs.
1/12/20	Jennifer Craig	<p>Governing boards: made up of 2 parents, 2 community members and NO charter school teachers:</p> <p>It is extremely unusual for parents and community members who aren't certified in special education to have the level of expertise required to write an IEP/ or accommodations - who will write/ modify IEPs and who of the governing board (because they can be teachers) will ensure that these are met?</p> <p>-Charter schools contracting with county boards for services: special education teachers are already overworked and hard to find and county systems are already struggling to staff their schools with certified special education teachers. Eligibility meetings REQUIRE parents, general educator, special educator, and a chairperson (most often the principal) as the policy is written NO charter school is required to have certified teachers and NONE are required to have a background in special education</p>	<p>N</p> <p>A/C</p>	<p>See Response 13.</p> <p>See Response 15.</p>

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		- this is not equitable and will be exclusionary		
1/13/20	Pamela JW Cain	I actually need to take a break. I hope this will save.	N	The comment is not germane.
1/14/20	Terri Engnoth	In the contract, charter schools must be required to provide free and reduced lunch and breakfast. If charters schools do not have their own kitchen, counties will be provided with additional funding to cover all costs associated with cooking and transporting food.	N	See Response 20.
1/14/20	Leah Earle	No charter schools	N	Duplicate comment from Section 1.
1/14/20	Heather DeLuca-Nestor	Enrollment window- The proposed policy lists the process for student enrollment applications and lottery enrollment to conclude May 1 of each year. Student enrollment at the charter will impact the county boards budget and staffing patterns at the other public schools for the following year. An enrollment deadline of May 1 is too late for the county board to make alternative plans and alter staffing at schools.	A/C	A revised timeline places the enrollment deadline on April 15 th for the primary round and February 15 th for every subsequent year.
1/14/20	Tim Hardesty	Align to state code for graduation requirements. Add a school leader “with an educational background that provides the capacity to be an instructional leader”	N A/C	Response 26: Pursuant to W. Va. Code §18-5G-1, et seq., Policy 3300 provides charter schools with the opportunity to define graduation requirements separate from existing code and rules for non-charter public schools. However, Policy 3300 requires authorizers to evaluate the proposed graduation requirements in determining if the proposed school is likely to satisfy the purpose of improving student outcomes. Policy 3300 now includes additional language in Section 5 defining what authorizers should look for in evaluating “Educational program capacity.”

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1/14/20	Ryan Saxe	Align to state code for graduation requirements. Add a school leader “with an educational background that provides the capacity to be an instructional leader”	N A/C	See Response 26. Policy 3300 now includes additional language in Section 5 defining what authorizers should look for in evaluating “Educational program capacity.”
1/14/20	Jedd Flowers	•Align to state code for graduation requirements. •Add a school leader “with an educational background that provides the capacity to be an instructional leader”	N A/C	See Response 26. Policy 3300 now includes additional language in Section 5 defining what authorizers should look for in evaluating “Educational program capacity.”
1/14/20	John Treu	For consistency, I recommend adopting the terms “charter public school” and “non-charter public school” throughout Rule 3300 as this is the terminology adopted in the statute (see e.g. W. Va. Code § 18-5G-1).	N	Duplicate comment from Section 3.
1/14/20	Mark Swiger	I have fiduciary concerns based on equity and fairness to the processes we have set in our current public schools. I see room for abuse and fraud under these contracts.	N	See Responses 4, 7, 8, and 14.
1/14/20	Renee Mahon	I do like the fact that the county BOE, staff and parents have a say so as to if a school should start. It should be in writing that if staff and parents say no, that the county BOE says no. The County BOE should not have more power in the decision than anyone else. Charter schools should have a strict contract and close if they don meet standards.	A/S N	See Response 22. Policy 3300 Section 8.3 describes the revocation process.
§126-79-7. Responsibilities of Parties to a Charter Contract.				
11/15/19	James E Hundley	A county who authorizes a charter should have staff on hand with a business degree who reviews the application and then after signing off on the application, it must go through a legal review to ensure the application meets the criteria.	N	Policy 3300 directs authorizers to evaluate operations plans for charter schools. Authorizers must utilize internal or external expertise as necessary to appropriately evaluate charter school

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				applications.
11/15/19	Mary Deskins	I am opposed to charter schools. If WV must have them, the school must have a way to ensure they will stay open the whole school year, use only teachers with at least a bachelor's degree, provide teachers will pay equal to at least the same as the public school teachers in that zip code, institutionalize an audit system that confirms the number of students actually enrolled and attending, be required to have buildings that meet the same safety and comfort standard as the public schools in that zip code, and not allow for-profit businesses to be hired or used for that school.	N	Duplicate comment from Section 1.
11/17/19	Kim Kelly	I am a parent, and I do not want funds for charter schools taken from my daughter's public school.	N	Duplicate comment from Section 1.
11/17/19	Rondalyn Whitney	No to charters	N	Duplicate comment from Section 2
11/18/19	Lisa Weihman	I do not want money that should be going to our public schools used to charter schools. I am sickened that there are legislators in Charleston buying up property and scheming to turn charter schools into private slush funds. The graft and unethical behavior of our legislators in passing this mess is evident to many of us.	N	Duplicate comment from Section 1.
11/20/19	Jason M. Barr	I do NOT want any form or incarnation of charter schools in West Virginia	N	Duplicate comment from Section 1.
11/20/19	Liz	No for profit companies can manage charter schools.	A/S	See Response 7.
11/23/19	Ashlee Curtis	Please see the comment above.	N	Duplicate comment from Section 1.
11/25/19	Laura Perry	Waste of money	N	Duplicate comment from Section 1.
11/25/19	Gibson Terrell	Charters funnel tax money to private businesses. This should be illegal. WV politicians are greedy and they don't want to provide health insurance or retirement programs so they want to outsource education.	N	Duplicate comment from Section 1.

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11/26/19	Anh Alderton	They should be evaluated annually.	A/C	Policy 3300 requires annual evaluation of charter schools both within the state accountability system and against additional measures agreed upon by the authorizer and the charter school governing board. The contract is not scheduled for full evaluation until the year prior to its expiration, but an authorizer may require corrective action or revoke a contract if the charter school repeatedly fails to meet the required goals and benchmarks, does not adequately guard the safety, health, and well-being of students, or otherwise violates the terms of the charter contract.
12/6/19	Ethel	Ryan Saxe would be a good leader for the first charter school.	N	This comment is not germane to the formulation of Policy 3300.
12/10/19	Renee Mahon	They should be held to the same standards as public schools when it comes to curriculum and testing. They should not take money from public schools in any way shape or form.	N	See Response 11 for information on charter school testing and accountability. Pursuant to W. Va. Code §18-5G-1, et. seq., Policy 3300 provides charter schools with autonomy over curriculum.
			N	See Response 3.
12/12/19	Nelson Smith	7.1.b.7.A.: This is an admirable attempt to explain the authorizer’s limited role, but it’s a little too elaborate. I would suggest simply drawing a comparison between the charter’s direct management of its own affairs in matters of personnel, curriculum, and calendar (etc.) and oversight by the authorizer, which includes limited monitoring and focuses primarily on holding the school accountable for outcomes. 7.1.b.7.E: I am pleased to see this forthright	A/C	Policy 3300 now includes additional language drawing the distinction between authorizer oversight and governing board management.
			A/C	Policy 3300 now includes additional language outlining how the WVBE may

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		statement of WVBE’s authority to revoke authorizing authority in case of negligence. As the Board is likely aware, some states have required potential authorizers to seek a renewable license from the state board prior to authorizing. While the new West Virginia statute does not call for this, it’s good to see that there will be clear accountability for quality authorizing.		renew the authorizing authority of county boards that previously had this authority revoked.
12/21/19	Cheryl Cain	“Studies on for-profit schooling in Africa and Asia show that for-profit providers fall short of meeting educational standards. For example, in Kenya and Uganda, Bridge International, Academies a US-based international education business runs k-12 schools where they employ unqualified teachers, strictly directing their performance in the classroom through standardized scripts.” -American Educator Winter 2019-20	N	Duplicate comment from Section 2.
1/2/20	Tanya	The only responsibility is to give charter schools money. What responsibilities do charters have for my children? How does driving my child, packing their lunch, and assuming all other responsibilities help my child?	N	See Response 1.
1/3/20	Shawn Wright	The county, state & citizens	N	The meaning of this comment is not clear.
1/4/20	Leslie Haynes	Am I reading this correctly - that authorizers are responsible for the success and accessibility of charters? Isn't that the job of the charter? Shouldn't the authorizer focus on regular public schools, as that is an all-encompassing job? The verbiage seems to place an abundance of responsibility on the authorizer for essentially overseeing two different school systems. More staffing will be needed. More manpower will be needed to fulfill these responsibilities and that seems quite wasteful and unnecessary. School choice already exists. Im	N	Policy 3300 places the responsibility to monitor and evaluate the success and accessibility of charter schools. Authorizers are not responsible for achieving these ends. Instead, they must hold charter schools accountable for failure to meet the goals in their Accountability Plan or for failing to provide an educational environment accessible to all students. Many of the specific responsibilities of authorizer

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		<p>be reimbursed for the extra time and staff needed to help the charters with these services.</p> <p>7.1.b.10 - Again, authorizers should be reimbursed for the extra time they need to spend helping charters meet special education requirements, etc. Students at non-charter schools should not suffer due to a lack of staffing because the charter school is requiring extra help meeting these guidelines.</p>	A/C	See Response 15.
1/12/20	Jennifer Craig	<p>7.1- as the authorizer the county board won be able to carry out these responsibilities without hiring more staff- authorizers should be compensated by charter for any additional staff required.</p> <p>7.1.a.3 - charter schools should pay authorizer to retain legal counsel given the huge responsibility of overseeing special services in schools with no licensed special educators</p> <p>7.1.b.10 charter schools should pay the authorizer for support and oversight the authorizers should be required to complete compliance reporting since the "help" from county boards as authorizers isn explicitly negotiated.</p> <p>7.1.b.13 - authorizer allowing facilities "within its control to be used" Voters should have the right to vote on any school consolidation, co-location shared spaces with public schools or facilities that result in the creation of an independent school AKA a charter inside a public school facility</p>	<p>A/S</p> <p>A/C</p> <p>A/S</p> <p>N</p>	<p>Pursuant to W. Va. Code §18-5G-1, et. seq., Policy 3300 requires charter schools to pay an oversight fee to their authorizers Section 12 of Policy 3300 includes further definition of the oversight fee.</p> <p>See Response 15.</p> <p>See Response 15.</p> <p>Pursuant to W. Va. Code §18-5G-1, et. seq., Policy 3300 only requires authorizers to provide access/usage of <i>unused</i> facilities to charter schools.</p>
1/13/20	Jo Perez	Applicants must be personally held responsible for	N	See Response 25.

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		charter school failure, so they can take the money and run.		
1/13/20	Dale Lee	<p>7.1.b.7.A If authorizers are not making sure of compliance for the charters, as they are in making sure regulations are followed in regular public schools – who is? How is the expectation of “greater expectations and accountability” to be monitored if oversight is lacking? The charter school governing board does not have the expertise or impartiality to make those determinations</p> <p>7.1.b.7.B the language of “when authorizers learn of instances” is too weak. How do the learn of these instances if they do not monitor the school?</p> <p>7.1.b.13.C All counties need increased funding for public school and to make up for the money lost to a charter. They should not be leasing public facilities to a charter at a rate under the current market value.</p>	<p>N</p> <p>A/C</p> <p>A/S</p> <p>N</p>	<p>Pursuant to W. Va. Code §18-5G-5(b), Policy 3300 requires authorizers to continually monitor adherence to the charter school’s Accountability Plan. Policy 3300 section 7.1.b.7 outlines the process for monitoring, requesting corrective action, and, if necessary, suspending or revoking a charter.</p> <p>Clarifying language has been added. See response above regarding monitoring.</p> <p>See Response 3.</p> <p>... Pursuant to W. Va. Code §18-5G-12(a), Policy 3300 allows the authorizer to make the determination whether to set the lease rate at market value or at a lower rate.</p>
1/13/20	Jennifer Jones	It would be extremely unusual for parents and community members to have the level of expertise required to write any educational documents including IEPs, 504s, and the official waiver forms for special education students. As a parent of a special needs student I require the guidance and assistance that special education teachers can provide.	A/C	See Response 15.
1/13/20	Rebecca Speakman	Voters should have the right to vote on any school consolidation that results in the creation of an independent school that is a school considered “co-location.” The governing boards will most likely be	<p>N</p> <p>A/C</p>	<p>See Response 22.</p> <p>See Response 15.</p>

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		made up of parents and community members, who would unlikely have the expertise to write IEP accommodations. This is absolutely unacceptable. There needs to be requirements in regards to special education experts on these governing boards.		
1/13/20	Jeremiah Underhill	Section 7.2.b.8 a. Regarding providing appropriate and necessary services to those students who have individualized education programs b. Suggest adding specific language regarding Child Find obligation such as "The governing board also is responsible for identifying and assessing students who may be in need of special education services and not yet be receiving said services."	A/C	See Response 15.
1/14	Sarah Reggi	7.1 As the authorizer, the county board will not be able to carry out these responsibilities without hiring more staff. 7.1.a.3 How will an authorizer conduct necessary oversight to ensure charter school students receive legally required services? - Including oversight of special education services, school nutrition, etc, 7.1.b.10 Help from the county board does need to be explicitly negotiated, especially since no one at a charter school is required to know how to operate a public school. Authorizers must complete compliance reporting to avoid "he said-she said" conflicts. 7.1.b.13 Voters shall have the right to vote on any school consolidation that results in the creation of an independent school, aka. a charter school, in the	A/S N N N	Pursuant to W. Va. Code §18-5G-1, et. seq., charter schools are required to remit an oversight fee to authorizers. Authorizers can use this fee to help obtain the required resources. See Response 15. Policy 3300 establishes required reporting for charter schools and authorizers. See Response 22.

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		<p>school building.</p> <p>7.2.b.8 (A-C) Charter governing boards (which include 2 charter parents, 2 local community members, and at least one additional member) would not likely have the level of expertise required to write IEP goals, accommodations and modifications. So who will write and/or modify the IEPs? An eligibility meeting includes the students parents, GEE teacher, SPED teacher, and administrator and related service providers (PT, OT, SLP). As the policy is written now, none of these people (on the governing board) are required to have a background in special education. While charter schools can contract with county boards for services, special education teachers (and related service providers) are already stretched thin, overworked, and hard to find.</p>	A/C	See Response 15.
1/14/20	Terri Engnoth	<p>As the authorizer, the county board will not be able to carry out these responsibilities without hiring more staff. Authorizers should be compensated by charter for any additional staff required.</p> <p>Charter schools must pay authorizer to retain legal counsel, given the huge responsibility of overseeing special education services in a school that requires no licensed special educators.</p> <p>IEPs must be written by a licensed teacher who works AT the charters school. Students are best served by teachers who actually know and work with the students.</p> <p>Charter schools must pay the authorizer to provide support and oversight.</p> <p>This "help" from the county board DOES need to be</p>	<p>A/S</p> <p>A/C</p>	<p>Pursuant to W. Va. Code §18-5G-1, et. seq., charter schools are required to remit an oversight fee to authorizers. Authorizers can use this fee to help obtain the required resources.</p> <p>See Response 15.</p>

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		explicitly negotiated, especially since NO ONE at a charter school is required to know how to operate a public school. To avoid "he said-she said" conflicts, authorizers must complete compliance reporting. A charter school operating WITHIN an operating public school is called "co-location," which is already law. However, voters shall have the right to vote on any school consolidation that results in the creation of an independent school, aka. a charter school, in the school building.		
1/14/20	Leah Earle	No charter schools	N	Duplicate comment from Section 1.
1/14/20	Heather DeLuca-Nestor	Transportation-If the charter school is not required to provide some type of transportation (either on their own or contracted through the county) becomes a criterion for selecting a certain demographic of students.	N	See Response 9.
1/14/20	Tim Hardesty	Develop state training for governing boards and add the requirement that all governing board members complete the training within a time frame. Include that the governing board is responsible for the safety and security of students. Specify a minimum number of meetings per year for the charter school governing board. Providing 14 days to fulfill requests made by the state is not always realistic in meeting state deadlines.	A/C A/C A/C	See Response H. Policy 3300 now includes language about safety and security in Section 7 explicitly in addition to references throughout. Policy 3300 now requires quarterly public meetings of the governing boards. Policy 3300 now includes language excepting certain circumstances when providing at least 14 days is not required.
1/14/20	Ryan Saxe	Develop state training for governing boards and add the requirement that all governing board	A/C	See Response H.

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		<p>members complete the training within a time frame.</p> <p>Include that the governing board is responsible for the safety and security of students.</p> <p>Specify a minimum number of meetings per year for the charter school governing board.</p> <p>Providing 14 days to fulfill requests made by the state is not always realistic in meeting state deadlines.</p>	<p>A/C</p> <p>A/C</p> <p>A/C</p>	<p>Policy 3300 now includes language about safety and security in Section 7 explicitly in addition to references throughout.</p> <p>Policy 3300 now requires quarterly public meetings of the governing boards.</p> <p>Policy 3300 now includes language excepting certain circumstances when providing at least 14 days is not required.</p>
1/14/20	Jedd Flowers	<ul style="list-style-type: none"> •Develop state training for governing boards and add the requirement that all governing board members complete the training within a time frame. •Include that the governing board is responsible for the safety and security of students. •Specify a minimum number of meetings per year for the charter school governing board. •Providing 14 days to fulfill requests made by the state is not always realistic in meeting state deadlines. 	<p>A/C</p> <p>A/C</p> <p>A/C</p> <p>A/C</p>	<p>See Response 27.</p> <p>Policy 3300 now includes language about safety and security in Section 7 explicitly in addition to references throughout.</p> <p>Policy 3300 now requires quarterly public meetings of the governing boards.</p> <p>Policy 3300 now includes language excepting certain circumstances when providing at least 14 days is not required.</p>
1/14/20	John Treu	<p>For consistency, I recommend adopting the terms “charter public school” and “non-charter public school” throughout Rule 3300 as this is the terminology adopted in the statute (see e.g. W. Va. Code § 18-5G-1).</p>	<p>N</p>	<p>Duplicate comment from Section 3.</p>
1/14/20	Tonya Stuart Rinehart	<p>In order for authorizers to oversee the strictures</p>	<p>A/S</p>	<p>See Response 27.</p>

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		<p>and happenings of a charter, more administrative positions are going to need to be created at the county level. We are overburdened with administrative positions already and it is hard to justify adding more. Charters should compensate local BOEs for any position created.</p> <p>A greater amount of accountability through a well highly detailed accountability process needs to be in place for charters. Charters also need to provide their own legal aid for any issue that arises concerning special education students, etc. this responsibility should not fall to the authorizer.</p> <p>Before allowing a charter to co locate with a public school, voters should have the opportunity to vote on any type of consolidation.</p> <p>In the matters of IEPs and special education services, how will charters legally provide the oversight and accountability necessary to ensure students with IEPs are successful? Special education professionals and service employees are already overworked and stretched and will not be able to provide supports for charters.</p>	<p>N</p> <p>A/C</p> <p>N</p> <p>A/C</p>	<p>See Response 11.</p> <p>See Response 15.</p> <p>See Response 22.</p> <p>See Response 15.</p>
1/14/20	Renee Mahon	They should be responsible and be held accountable for every dime they spend just like public schools. They should have to report to County BOE and state department regularly just like public schools.	A/S	See Response 8.
§126-79-8. Process for Renewal and Revocation of Charter Contracts.				
11/15/19	James E Hundley	I feel there should be an annual report to the state superintendent that breaks down the dynamics of achievement for a facility like public schools have a		Response 7: Pursuant to W. Va. Code §18-5G-1, et. seq., Policy 3300 requires charter schools to participate in the same state

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		report card system to show their dynamics. This, in my opinion, would give the state superintendent the opportunity to catch inconsistencies the county may not be able to observe.		accountability system as non-charter public schools. Policy 3300 also requires charter schools and authorizer to agree, in the charter contract, to a performance framework with additional accountability measures aligned to the specific educational mission of the charter school.
11/15/19	Mary Deskins	I am opposed to charter schools. If WV must have them, the school must have a way to ensure they will stay open the whole school year, use only teachers with at least a bachelor's degree, provide teachers will pay equal to at least the same as the public school teachers in that zip code, institutionalize an audit system that confirms the number of students actually enrolled and attending, be required to have buildings that meet the same safety and comfort standard as the public schools in that zip code, and not allow for-profit businesses to be hired or used for that school.	N	Duplicate comment from Section 1.
11/17/19	Kim Kelly	I am a parent, and I do not want funds for charter schools taken from my daughter's public school.	N	Duplicate comment from Section 1.
11/17/19	Rondalyn Whitney	No to charters	N	Duplicate comment from Section 2
11/18/19	Lisa Weihman	I do not want money that should be going to our public schools used to charter schools. I am sickened that there are legislators in Charleston buying up property and scheming to turn charter schools into private slush funds. The graft and unethical behavior of our legislators in passing this mess is evident to many of us.	N	Duplicate comment from Section 1.
11/20/19	Jason M. Barr	I do NOT want any form or incarnation of charter schools in West Virginia	N	Duplicate comment from Section 1.
11/23/19	Ashlee Curtis	Please see the comment above.	N	Duplicate comment from Section 1.
11/25/19	Laura Perry	Waste of money	N	Duplicate comment from Section 1.
11/25/19	Gibson Terrell	Charters funnel tax money to private businesses.	N	Duplicate comment from Section 1.

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		This should be illegal. WV politicians are greedy and they don't want to provide health insurance or retirement programs so they want to outsource education.		
11/26/19	Anh Alderton	Review by the board of education, parents.	A/C	Policy 3300 now includes a requirement for public input on renewal decisions.
12/3/19	Theodore Webb	any discrimination or abuse is automatic revocation / non-renewal of charter contract	A/S	Policy 3300 empowers authorizers to revoke a charter contract for failure to comply with the anti-discrimination provisions in this policy as well as state and federal law or if continued operation threatens the health or safety of students.
12/10/19	Renee Mahon	There should be very strict renewal or revocation guidelines. They need to prove that the education the students are getting is top notch and helping students get ready for college or the work force.	A/S	Policy 3300 specifies failure to meet performance expectations, including those in the state accountability system and the additional school-specific accountability measures set forth in the charter contract, as a reason to decline renewal of a charter contract.
12/21/19	Cheryl Cain	"Studies on for-profit schooling in Africa and Asia show that for-profit providers fall short of meeting educational standards. For example, in Kenya and Uganda, Bridge International, Academies a US-based international education business runs k-12 schools where they employ unqualified teachers, strictly directing their performance in the classroom through standardized scripts." -American Educator Winter 2019-20	N	Duplicate comment from Section 2.
12/28/19	Andrew	If any board member of a charter school becomes defunct, no board member shall become a board member for another charter school. Any dishonesty on application or a person set to profit from charter schools, that person is removed	A/C	See Response 7, 8, and 13 for information on the evaluation and oversight of governing boards by authorizers. Policy 3300 now includes a requirement for potential board members to disclose

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		from charter board and charter contracts are null and void.		and explain any education-related actions taken against them in the charter school application. Policy 3300 now specifically includes fraudulent application materials as a reason for non-renewal or revocation of a charter contract.
1/2/20	Tanya	What a joke! Please, look at the requirements and ensure they are legal, and they are "fair"	N	See Response 1.
1/3/20	Shawn Wright	The County should decide.	A/S	The county board of education, as authorizer, renders all renewal and revocation decisions.
1/4/20	Leslie Haynes	Good detail and covers all areas except, again, requires significant additional duties of the authorizer.	A/S	National standards for creating the environment in which charter schools benefit students require authorizers to take on significant responsibility and authority for charter school oversight and accountability.
1/7/20	Jeremy	West	N	See Response 1.
1/12/20	Jennifer Craig	Renewal / Revocation - no clear guidelines are set forth the explicitly outline reasons an authorizer can deny renewal or revoke- it states things like health and safety, performance, etc.. but fails to outline what these would entail.	N	Policy 3300 requires authorizers to based renewal decisions on the performance of the charter school against the provisions defined in the charter contract specific to that charter school and authorizer.
1/13/20	Dale Lee	8.5.a The closure plan should also include a plan for the transition of staff	N	Policy 3300 requires authorizers and charter school to agree to closure plans in the charter contract. They may agree to provisions related to the transition of staff. For staff previously employed by the county board of education, they have continued to accrue seniority with the county and may return to employment in schools operated by the county board. For

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				staff not previously employed by the county board, they are the employees of the governing board and have no existing relationship to the county board or the WVBE so no plans can be determined ahead of time for such employees.
1/13/20	Rebecca Speakman	No independent free school district, or organization shall hereafter be created, except with the consent of the school district or districts out of which the same is to be created, expressed by a majority of voters voting on the question.	N	See Response 1.
1/14/20	Terri Engnoth	The public should be able to VOTE to not renew, or even revoke, a charter contract if the charter school is not performing the same or better than the local public school. As this policy is written, there is no local control over charters opening or closing.	N	See Response 22.
1/14/20	Leah Earle	No charter schools	N	Duplicate comment from Section 1.
1/14/20	Heather DeLuca-Nestor	When schools are converted to charters there should be a certain percentage of parents and staff who vote on this before a conversion can occur. A survey is not enough to decide on the conversion. The language regarding those students and staff who choose not to remain at the school once it becomes a charter needs to become stronger.	N	Response 22.
1/14/20	John Treu	For consistency, I recommend adopting the terms “charter public school” and “non-charter public school” throughout Rule 3300 as this is the terminology adopted in the statute (see e.g. W. Va. Code § 18-5G-1).	N	Duplicate comment from Section 3.
1/14/20	Renee Mahon	There should be a vote every year by staff and community as to whether school should stay or go.	N	Policy 3300 establishes authorizers (i.e., elected county boards of education) and charter school governing boards as parties to the charter contract, which may have a

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				term length up to five years.
§126-79-9. Enrollment, Recruitment, and Retention.				
11/15/19	James E Hundley	9.4.c.1 - what becomes of students who as in public education are installed into the facility through the legal system? There should be a mapping protocol for the judicial system to understand how a child installed through legal action for things other than someone just suing to get them in should be handled. A student who may be of a disciplinary or attendance criteria.	N	Policy 3300 requires charter schools to remain responsible for students placed outside charter schools for disciplinary purposes.
11/15/19	Mary Deskins	I am opposed to charter schools. If WV must have them, the school must have a way to ensure they will stay open the whole school year, use only teachers with at least a bachelor's degree, provide teachers will pay equal to at least the same as the public school teachers in that zip code, institionalize an audit system that confirms the number of students actually enrolled and attending, be required to have buildings that meet the same safety and comfort standard as the public schools in that zip code, and not allow for-profit businesses to be hired or used for that school.	N	Duplicate comment from Section 1.
11/17/19	Kim Kelly	I am a parent, and I do not want funds for charter schools taken from my daughter's public school.	N	Duplicate comment from Section 1.
11/17/19	Rondalyn Whitney	No to charters	N	Duplicate comment from Section 2
11/18/19	Lisa Weihman	I do not want money that should be going to our public schools used to charter schools. I am sickened that there are legislators in Charleston buying up property and scheming to turn charter schools into private slush funds. The graft and unethical behavior of our legislators in passing this mess is evident to many of us.	N	Duplicate comment from Section 1.
11/20/19	Jason M. Barr	I do NOT want any form or incarnation of charter schools in West Virginia	N	Duplicate comment from Section 1.

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11/20/19	Liz	Charter schools should not be allowed to dismiss students unless the student behavior is criminal in nature.	N	<p>Pursuant to W. Va. Code §18-5G-1, et. seq., Policy 3300 provides charter schools autonomy to set their own discipline guidelines. However, charter schools remain responsible for providing required educational and other students enrolled in their school during any suspension or expulsion. Additionally, students expelled from a charter school have the right to re-enroll after the period of expulsion (e.g., the end of the school year) ends.</p> <p>Response 16: Policy 3300 requires authorizers to review student mobility, including for disciplinary reasons, to ensure charter schools do not have unreasonably high rates of mobility overall or among student subgroups. Authorizers may request charter schools take corrective action to address unreasonably high rates of turnover, including appearing before the WVDE.</p>
11/20/19	Rebecca Sykes	My child is a special needs student with both an IEP and BIP. I worry that because my child costs more to educate my family would not be encouraged and welcomed to enroll.	A/C	<p>Policy 3300 now includes additional clarifying language on the roles, responsibilities of charter schools and county boards of education (as authorizers and LEAs) regarding students with disabilities and/or receiving special education services. The new language clarifies how funding for provision of required services works.</p> <p>Additionally, see Response 6 for information on ensuring that enrollment</p>

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				in charter schools is an option for all students.
11/23/19	Ashlee Curtis	Please see the comment above.	N	Duplicate comment from Section 1.
11/25/19	Laura Perry	Waste of money	N	Duplicate comment from Section 1.
11/25/19	Gibson Terrell	Charters funnel tax money to private businesses. This should be illegal. WV politicians are greedy and they don't want to provide health insurance or retirement programs so they want to outsource education.	N	Duplicate comment from Section 1.
11/26/19	Anh Alderton	Publicly advertise to ensure equal opportunity for everyone.	A/S	Policy 3300 requires charter schools to publicize their offerings and actively recruit students in their primary recruitment are each year. Additionally, Policy 3300 requires authorizers to review charter school enrollment annually to identify instances in which student demographics at charter schools diverge from those at surrounding non-charter public schools.
12/3/19	Theodore Webb	must accept anyone and bus students in, if "charter" isn truly public, it is a sorting effect the wealthier people drive their kids there & guts public schools; any so-called "better performance" is nothing but fake sorting effect	N	See Response 6.
12/10/19	Renee Mahon	They should not take students away from public schools. They should never go into public schools to recruit students away. They should not be allowed to recruit at sporting events or anything out in the public.	N	Policy 3300 requires charter schools to publicize their offerings and actively recruit students in their primary recruitment are each year. Public recruitment is necessary to ensure charter schools are an actual option for all students and do not have demographics that diverse excessively from those at surrounding non-charter public schools.
12/11/19	Wendy Peters	I have many concerns about this part of the policy.	N	School funding depends on student

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		<p>The enrollment period will result in uncertainty regarding budgets and personnel changes for local school boards. This will negatively impact the students in those areas. It also appears the students can move back and forth between public and charter schools. This would be a nightmare when looking at the state aid money.</p>		<p>enrollment as of October 1 in the prior school year. As a result there is ample time for charter and non-charter schools to adjust for changes in funding between October and beginning of the following school year. Policy 3300 does provide for some additional funding through the increased enrollment funding mechanism provided for in W. Va. Code §18-9A-15. This will ensure that charter schools and/or county school districts that experience increased enrollment from one year to the next due to transfers between charter and non-charter schools receive the appropriate funding for increased enrollment.</p>
12/12/19	Nelson Smith	<p>9.2.a.1. – Not sure what it means for county boards to “work together as the authorizer” when a school operates across counties. Does this mean, for example, that both school boards would be required to approve any contract amendment? Or would it make more sense to designate one county as the authorizer of record? In any case, the Rule should be clearer about the legal responsibilities of cooperating districts – especially since this provision holds some real promise for creation of charters meeting regional needs.</p> <p>9.2.d. I question whether this extensive retention review is justified by statute. Any conscientious charter school board will review and ask questions about student retention, and authorizers should likewise be on the lookout for troubling trends. But this section suggests an oversight process that is both vague and overly prescriptive – for example</p>	A/C	<p>Pursuant to W. Va. Code §18-5G-1, et. seq., Policy 3300 allows two or more counties to act collectively as the authorizer for a charter school with a primary recruitment area that spans two or more counties. Policy 3300 now includes additional language stating that county boards of education that are collectively authorizing charter schools may form a special board with not fewer than five members and not fewer than two members from each cooperating county board. This board acts as the authorizer for this school except on matters relating to charter school application approvals and charter contract renewals.</p>

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		<p>warning of “excessive turnover” or “excessive midyear transfers” without providing any parameters.</p> <p>I would also note that the reference to WV Code 18-5G-11-6 is puzzling: While that section begins by explicitly forbidding discrimination, it ends with a set of explicit situations in which a charter school’s distinctive mission may attract disproportionate numbers of targeted populations.</p> <p>Provided, That this subdivision may not be construed to limit the formation of a public charter school that is dedicated to focusing its education program and services on students with special needs, including, but not limited to, at-risk students, English language learners, students with severe disciplinary problems at a noncharter public school, or students involved with the juvenile justice system.</p> <p>Rather than linking these provisions to the possibility of discrimination, it would be more appropriate simply to note that charter schools with special missions will likely attract disproportionate numbers of students they set out to serve. Since this is fairly obvious, I would suggest scrapping this section and leaving to the discretion of local district authorizers how to address demographic shifts in light of approval decisions they make.</p>	N	<p>Policy 3300 requires enrollment, turnover, and mid-year transfer reviews to ensure authorizers are proactively monitoring and addressing any situations in which charter schools enrollment or mobility suggest that they are not meeting the spirit of open enrollment required by W. Va. Code §18-5G-1, et. seq. Policy 3300 does not institute precise thresholds in recognition that local context and the education mission of the charter school, including to recruit and serve certain at-risk groups as allowed by W. Va. Code §18-5G-1, et. seq. and Policy 3300, prevent setting a threshold that would appropriately serve all situations. The review processes established by Policy 3300 rely on the good judgement of county boards of education in the same way that the approval and renewal processes require them to make their best efforts to apply evaluation criteria and supporting rubrics rather than relying on strict, quantitative rules.</p>
12/21/19	Cheryl Cain	<p>“Studies on for-profit schooling in Africa and Asia show that for-profit providers fall short of meeting educational standards. For example, in Kenya and Uganda, Bridge International, Academies a US-based international education business runs k-12 schools where they employ unqualified teachers,</p>	N	<p>Duplicate comment from Section 2.</p>

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		strictly directing their performance in the classroom through standardized scripts.” -American Educator Winter 2019-20		
12/28/19	Andrew	<p>Enrollment must be reported and constantly given these results to WVDE and the public school BOE that the charter school resides in. All students must be able to register and be accepted to public charter schools.</p> <p>Charter schools shall not recruit students who are currently enrolled in public schools until the end of the academic year. Charter schools shall follow the WVSSAC policy about student athletics and recruitment.</p>	<p>A/S</p> <p>A/S</p> <p>N</p> <p>A/S</p>	<p>Pursuant to W. Va. Code §18-5G-1, et. seq., Policy 3300 requires charter schools to use the same education information systems as non-charter public schools (e.g., WVEIS and successor platforms) enabling the WVDE and county boards of education to track enrollment at charters in the same manner they track enrollment for non-charter public schools.</p> <p>See Response 6 for mechanism that ensure charter schools are open to all students.</p> <p>Regarding the suggested prohibition on recruitment during the school years, charter school recruitment activities must occur prior to the annual enrollment application and lottery process meaning these activities need to occur during the academic year. If students are transferring mid-year to a charter school causing disruption at both the charter school and the non-charter school, the authorizer can address this increased student mobility through the mid-year transfer review required by Policy 3300.</p> <p>Response 28: Policy 3300 makes all extracurricular activities at charter schools subject to all WVSSAC rules.</p>

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1/2/20	Tanya	Enrollment should be open all year with a mandate to accept any child, anytime. Serving food and transportation should not be an option. These should be required.	A/S N N	See Response 20. See Response 9.
1/3/20	Shawn Wright	Having unqualified teachers teach non factual information will only hurt West Virginia.	N	See Response 2.
1/4/20	Leslie Haynes	This section states that most charters must be open to all students, but does not specify how they will maintain a diverse student population. Simply stating that students cannot be discriminated against does not guarantee that another fabricated reason for rejection will be procured. How will the state ensure that mid-year transfer students who leave charters will have required services in non-charter public schools?	A/S	Policy 3300 establishes the enrollment, mid-year transfer, and turnover review processes to ensure authorizers are monitoring student demographics at charter schools. These mechanisms provide processes for authorizers to use to safeguard against the student demographics at charter public schools diverging from those at surrounding non-charter public schools. They also require review of mobility by student subgroup to guard against high mobility among specific subgroups.
1/5/20	Millie Stoneking	Need to have a limit on the number of times one student may transfer between charter schools and public schools. Curriculum and objectives may not correspond in each of the schools.	N	Pursuant to W. Va. Code §18-5G-1, et. seq., Policy 3300 provides students and their families with control over the choice of whether to enroll at a charter or non-charter public school. Limiting this choice may have adverse effects on students' experiences and outcomes. That said, Policy 3300 does address high rates of mobility into/out of charter schools. See Response 16 for more information on authorizer review of student mobility.
1/7/20	Jeremy	Virginia	N	See Response 1.

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1/10/20	Travis Wells	Even with safeguards in place, charter schools in other states have been shown to have ways manipulate their enrollment/ recruitment to meet their needs to create a segregated school system.	N	See Response 6.
1/10/20	Dr. Carole Garrison, PhD	graduation should be aligned with state code; transfers of students needs to be clarified	N	See Response 26.
1/12/20	Jennifer Craig	9.1.b if a student is enrolled in a charter school and that charter fails to provide them with the necessary tools, skills, or coursework and they transfer to a public school this provision of the policy states they will still graduate on time , placing burden on the public school of "catching this student up" while be accountable for graduation requirements set forth by state policy. If a student transfers from a charter without necessary coursework, grades, etc to graduate on time the public school should NOT have this burden of providing the remedial services that the charter did not provide.	N	Policy 3300 places the responsibility for oversight and annual performance reviews of charter schools on the county boards of education as authorizers. If the authorizer detects a pattern of underprepared students returning to non-charter public schools from a charter school, the authorizer can intervene with the charter school and require corrective action. Failure to address underlying conditions may constitute grounds for denial of charter contract renewal, or in extreme cases, revocation of the charter contract and closure prior to the end of the original term of the contract.
1/13/20	Allyson	Students should not be able to transfer freely throughout the year between the charter and public schools in the county. I believe there should be limits on transfers in order to not interrupt the education process for the transferring students and those students already in the schools. Likewise, the May 1st deadline is too late for the county board to make alternative plans and alter the staffing at schools.	N A/C	Pursuant to W. Va. Code §18-5G-1, et. seq., Policy 3300 provides students and their families with control over the choice of whether to enroll at a charter or non-charter public school. Limiting this choice may have adverse effects on students' experiences and outcomes. That said, Policy 3300 does address high rates of mobility into/out of charter schools. See Response 16 for more information on authorizer review of student mobility.

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				A revised timeline places the enrollment deadline on April 15 th for the primary round and February 15 th for every subsequent year.
1/13/20	Richard Morris	Students should not be able to transfer freely throughout the year between the charter and public schools in the county. I believe there should be limits on transfers in order to not interrupt the education process for the transferring students and those students already in the schools. Likewise, the May 1st deadline is too late for the county board to make alternative plans and alter the staffing at schools.	N A/C	<p>Pursuant to W. Va. Code §18-5G-1, et. seq., Policy 3300 provides students and their families with control over the choice of whether to enroll at a charter or non-charter public school. Limiting this choice may have adverse effects on students' experiences and outcomes.</p> <p>That said, Policy 3300 does address high rates of mobility into/out of charter schools. See Response 16 for more information on authorizer review of student mobility.</p> <p>A revised timeline places the enrollment deadline on April 15th for the primary round and February 15th for every subsequent year.</p>
1/13/20	Dale Lee TITLE: WVEA President ROLE: Other WVEA Charleston WV	<p>9.1.b There should be student transfer windows and times should be limited when a student can move between the regular and charter school. The disruption to the learning process of students at both receiving and sending schools should be considered and minimized.</p> <p>9.2.d.3 What is defined as "excessive turnover?"</p> <p>9.3.b.2 May 1 is too late for enrollment numbers. County boards must know before May 1 in order to</p>	N N A/C	<p>Pursuant to W. Va. Code §18-5G-1, et. seq., Policy 3300 provides students and their families with control over the choice of whether to enroll at a charter or non-charter public school. Limiting this choice may have adverse effects on students' experiences and outcomes.</p> <p>That said, Policy 3300 does address high rates of mobility into/out of charter schools. See Response 16 for more</p>

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		make funding and staffing decisions for their other schools		information on authorizer review of student mobility. A revised timeline places the enrollment deadline on April 15 th for the primary round and February 15 th for every subsequent year....
1/13/20	Elliott Kendle	1. There should be time limits on transfers in order to not disrupt the educational process for the transferring students and the students already in the schools. 2. Student enrollment at charter schools will affect budgets and staffing at other schools. An enrollment deadline of May 1 is too late for county boards to make alternative plans and alter staffing.	N A/C	Pursuant to W. Va. Code §18-5G-1, et. seq., Policy 3300 provides students and their families with control over the choice of whether to enroll at a charter or non-charter public school. Limiting this choice may have adverse effects on students' experiences and outcomes. That said, Policy 3300 does address high rates of mobility into/out of charter schools. See Response 16 for more information on authorizer review of student mobility. A revised timeline places the enrollment deadline on April 15 th for the primary round and February 15 th for every subsequent year.
1/13/20	Rebecca Speakman	Charters should have to keep every child they enroll for the entire school year. They should be required to enroll any students wishing to enroll as long as they can serve that student effectively. If a charter is allowed to dismiss a student from their school, the per pupil cost should be paid back to the public school district.	A/S	See Response 6. Additionally, per Policy 3300 charter schools are not relieved of responsibility to educate enrolled students whom they expel.
1/13/20	Jeremiah Underhill	V. Section 9.2.b.6	A/C	See Response 15.

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		<p>a. The closest the rules come to mentioning a preference for children with disabilities is section (C) regarding children with special needs, thus, it is difficult to tell if “children with special needs” includes all children with any kind of disability or if it only includes children with behavioral issues whether due to a disability or not</p> <p>b. Children with disabilities have needs although placing them in the category of “children with special needs” may not be appropriate</p> <p>c. Charter schools are allowed to specialize and should be given the right to specialize in providing an education for children with disabilities</p> <p>d. I propose that Section 9.2b.6.C (immediately following section regarding children with special needs) should read “Children with any type of disability” with the current section 9.2b.6.C becoming 9.2b.6.D (concerning children of governing board members and full time employees)</p> <p>Section 9.4.a a. Student Discipline: “Provisions concerning student expulsion and out-of-school suspension must be incorporated into the charter contract.” b. Charter schools be required to provide explicit provisions regarding not only out-of-school suspensions, but in-school suspensions as well.</p> <p>Section 9.4.c a. In the section on discipline, it is clear any student with a disability must be provided “procedural</p>	<p>N</p> <p>A/C</p>	<p>Pursuant to W. Va. Code §18-5G-1, et. seq., charter schools have autonomy over daily operations. Authorizers shall review proposed school policies as part of the application review. However, requiring the discipline policy to be in the contract unduly limits the ability of charter schools to adjust to the needs of students.</p>
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		<p>safeguards and due process rights and procedures” before expulsion. I would suggest having explicit provisions regarding any student with a disability receiving “procedural safeguards and due process rights and procedures” before an out-of-school suspension.</p> <p>b. Having such a clause would give more protection than required by law, so if the Department of Education is resistant to the phrase “any suspension,” it could be modified to “any suspension greater than 10 days or any suspension resulting in a combined total of greater than 10 days of suspension”</p> <p>c. I believe it is important to have some explicit language regarding at least any suspension exceeding the 10 day rule, otherwise, it becomes easy to suspend a child with a disability repeatedly without examining the source of the child’s behaviors and any unmet needs of the child.</p>		Language was clarified in Policy 3300.
1/13/20	Ric MacDowell	I’m concerned with what happens if the county board does not adequately monitor enrollment and transfers out of charter schools. I have a real worry about how this will impact special education students.	A/C	See Responses 6 and 15.
1/14/20	Sarah Reggi	9.2.c.5 I don think that county BOEs should have a role in publicizing charter schools. It should be the sole responsibility of the charter school to spread word of the programs they offer, application to, etc. to communities they operate in.	N	Policy 3300 establishes charter schools as an option available to all students. The policy requires county boards to provide information on charter schools and processes for enrollment in the same manner they do for non-charter public schools in their jurisdiction in an effort to provide equal access to all available education, including charter schools, to all students.

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1/14/20	Terri Engnoth	Recruitment by charter schools shall not take place within an already existing school. Given that very few people, outside of the WV legislature want these schools, professional respect should be required by the state to not allow active poaching of students within a public school.	N	Policy 3300 requires charter schools to publicize their offerings and actively recruit students in their primary recruitment are each year. Public recruitment is necessary to ensure charter schools are an actual option for all students and do not have demographics that diverse excessively from those at surrounding non-charter public schools.
1/14/20	Leah Earle	Must take all students	A/S	See Response 6.
1/14/20	Carolyn Wagner	Charter schools should also have to provide transportation. The language in 3300 should reflect that. Otherwise, only students who can provide their own transportation will go and this becomes an elitist/segregated school. This is not right.	N	See Response 9.
1/14/20	Heather DeLuca-Nestor	Student transfers- There should be limits on transfers in order to not allow students to transfer freely throughout the year between charter schools and public schools. Allowing the in and out transfer will disrupt the learning of transferring students and those already in the schools.	N	Policy 3300 establishes student choice to opt in or out of enrollment in a charter school. Policy 3300 also requires authorizers to review end-of-year and mid-year transfers. Evidence of high turnover rates may lead to corrective action.
1/14/20	Tim Hardesty	Require any student transfers to meet West Virginia Code(s) for participation in sports and other extra-curricular activities. Clarify if mid-year transfer includes any transfer during the school year.	A/S A/C	See Response 28. Policy 3300 now includes a definition of mid-year transfer.
1/14/20	Ryan Saxe	Require any student transfers to meet West Virginia Code(s) for participation in sports and other extra-curricular activities. Clarify if mid-year transfer includes any transfer during the school year.	A/S A/C	See Response 28. Policy 3300 now includes a definition of mid-year transfer.

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1/14/20	Jedd Flowers	<ul style="list-style-type: none"> •Require any student transfers to meet West Virginia Code(s) for participation in sports and other extra-curricular activities. •Clarify if mid-year transfer includes any transfer during the school year. 	A/S A/C	See Response 28. Policy 3300 now includes a definition of mid-year transfer.
1/14/20	John Treu	For consistency, I recommend adopting the terms “charter public school” and “non-charter public school” throughout Rule 3300 as this is the terminology adopted in the statute (see e.g. W. Va. Code § 18-5G-1).	N	Duplicate comment from Section 3.
1/14/20	Renee Mahon	They should not be able to recruit on public school grounds or sporting events or after school events. They should not be able to take public school kids away from public schools period! They can recruit private school students or homeschool students.	A/C N	Policy 3300 now directs charter schools to avoid recruitment that disrupts the education environment at other non-charter and charter schools. Policy 3300 establishes charter schools as public schools open to all students independent of prior enrollment in a particular type of school.
1/14/20	John Connor	9.1.b. "Students must have the ability to transfer between charter and non-charter public schools without impairing their ability to graduate high school on time." While I can appreciate the Policys desire to minimally impact the students progress towards graduation, I am concern that there will be too free of an opportunity for students to transfer between schools during the year which could have negative financial impact upon either school based upon the funding formula, the dollars that transfer with the students, and the timing of the transfer. 9.3.b.2. I am concerned that the enrollment window concluding by May 1 is too late for County boards of education to make plans and/or alter	N A/C	See Response 3. A revised timeline places the enrollment deadline on April 15 th for the primary round and February 15 th for every subsequent year.

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		staffing at schools for the upcoming school year.		
§126-79-10. Educational Reporting Requirements.				
11/15/19	James E Hundley	an annual report card of academic performance which follows the same criteria as a public school with reference to curriculum, attendance, and assessment criteria	A/S	See Response 7.
11/15/19	Eric Engle	I'm very curious as to what reporting requirements for these schools will be. How will progress be defined and measured?	A/S	Pursuant to W. Va. Code §18-5G-1, et. seq., Policy 3300, section 10.2.b requires charter public schools use the same student information system (WVEIS) to report student information as non-charter public schools. Charter schools must also report any other information required to complete their performance frameworks to their authorizers. For more information about progress and accountability, see Response 7.
11/15/19	Mary Deskins	I am opposed to charter schools. If WV must have them, the school must have a way to ensure they will stay open the whole school year, use only teachers with at least a bachelor's degree, provide teachers will pay equal to at least the same as the public school teachers in that zip code, institutionalize an audit system that confirms the number of students actually enrolled and attending, be required to have buildings that meet the same safety and comfort standard as the public schools in that zip code, and not allow for-profit businesses to be hired or used for that school.	N	Duplicate comment from Section 1.
11/17/19	Kim Kelly	I am a parent, and I do not want funds for charter schools taken from my daughter's public school.	N	Duplicate comment from Section 1.
11/17/19	Rondalyn Whitney	No to charters	N	Duplicate comment from Section 2
11/18/19	Lisa Weihman	I do not want money that should be going to our	N	Duplicate comment from Section 1.

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		public schools used to charter schools. I am sickened that there are legislators in Charleston buying up property and scheming to turn charter schools into private slush funds. The graft and unethical behavior of our legislators in passing this mess is evident to many of us.		
11/19/19	Tim Reinard	IF the charter school fails in the meeting of state data scores, do we get the students back with lower scores and how does that impact the public school scores? We didn't teach them and then we may have low score students until we get the students back on track	N	All public schools—charter or non-charter—are responsible for the education of enrolled students, independent of incoming scores and/or the prior location of their enrollment. The West Virginia Balanced Scorecard's Academic Progress Indicator awards credit to schools for students who make year-over-year progress across the spectrum of incoming scores.
11/20/19	Jason M. Barr	I do NOT want any form or incarnation of charter schools in West Virginia	N	Duplicate comment from Section 1.
11/20/19	Liz	Charter schools must show higher academic outcomes than both the state average and the county average.	A/S	See Response 11. While these measures will not always represent higher academic outcomes (e.g., for a charter focused on students who are at-risk for dropping out due to low credit accumulation) than state or county averages, they provide authorizers with greater ability to hold charter schools accountable to their specific educational missions.
11/23/19	Ashlee Curtis	Please see the comment above.	N	Duplicate comment from Section 1.
11/25/19	Laura Perry	Waste of money	N	Duplicate comment from Section 1.
11/25/19	Gibson Terrell	Charters funnel tax money to private businesses. This should be illegal. WV politicians are greedy and they don't want to provide health insurance or retirement programs so they want to outsource education.	N	Duplicate comment from Section 1.

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11/26/19	Anh Alderton	Yes. Use the same testing system as traditional public school for convenience comparisons.	A/S	Policy 3300 requires charter schools to participate in annual, state testing.
12/3/19	Theodore Webb	everything has to be exact same standards as public schools or charter cannot be called "public"	N	Pursuant to W. Va. Code §18-5G-1, et. seq., Policy 3300 establishes charter public schools as public schools that operate with greater autonomy while be subject to greater accountability. They are required to participate in annual, statewide testing as well as the state accountability system. This means they will be measured by the same standards as non-charter public schools. They are also subject to additional accountability measures agreed upon in the charter contract between the authorizer and the charter school.
12/6/19	Ethel	Same as other schools no reporting or accountability.	N	Response 29: Pursuant to W. Va. Code §18-5G-1, et. seq., Policy 3300 requires charter schools to use the same education information systems to report data as non-public schools and to participate in annual, statewide testing and the state accountability system. The state accountability results will be publicly available, as they are for all public schools in West Virginia. Policy 3300 also establishes additional reporting and accountability requirements for charter schools, including additional reporting to the legislature and public as required by W. Va. Code §18-5G-1, et. seq. Policy 3300 establishes rigorous reporting requirements for charter schools based on identifying existing reporting requirements for non-charter public

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				schools that were appropriate for charter schools. These requirements include student testing, participation in the state accountability system, annual external financial audits, and reporting and certification of common student data elements such as attendance. Policy 3300 also place additional reporting requirements on charter schools face related to their accountability plan and their educational practices.
12/10/19	Renee Mahon	They need to report to the state department just like any other school and all data from that school needs to be recorded and send to WVEA President, AFT President and WVSSPA President. It should be public knowledge of how they perform, just like public schools.	A/S A/C	See Response 29. Student-level and/or non-public data cannot be shared with the entities listed due to state and federal privacy and student data protection laws. However, Policy 3300 now includes explicit section on the annual and public reporting of required around charter schools, in accordance with W. Va. Code §18-5G-1, et. seq.
12/21/19	Cheryl Cain	<p>“In Western industrialized nations too, public authorities are increasingly tempted to open their national school systems to the market, whether pushed by conservatives, drew-choice ideologies, blinded by the empty promises of private education entrepreneurs, or influenced by the largest global education fashions.”</p> <p>“Education is not a commodity. It is an individual as well as a collective right that can only be protected by governments. Public education is one of the few instruments of society to build social cohesion and</p>	N	See Response 1, 7, and 8.

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		to achieve equity. It is the first line of defense for nations against attacks on their democratic system, whether coming from the outside or within. Outsourcing that defense system is irresponsible, if not a symptom of being unbalanced." American Educator Winter 2019-20		
12/28/19	Andrew	All charter school students must take any WVDE summative assessments and their results must be reported and results shall be put on the WVDE website.	A/S	See Response 29.
1/2/20	Tanya	Why are there separations between what a public and a charter school require?	N	See Response 29.
1/3/20	Shawn Wright	Yes for everyone involved. (Teacher, Student & Administration)	N	The meaning of the comment is not clear.
1/7/20	David M Gladkosky	These requirements are well spelled out. I again wonder about the qualifications of the governing board to thoroughly and accurately carry out these responsibilities. The local board and the WVDE will need to keep a close eye for inconsistencies.	A/S N A/S	See Response 13. Policy 3300 requires charter schools to use the same education information systems as non-charter public schools allowing the WVDE to monitor data reporting in the same manner it does for non-charter public schools.
1/7/20	Jeremy	EVER	N	See Response 1.
1/10/20	Dr. Carole Garrison, PhD	charter schools should be required to comport with all state reporting requirements for public schools.	N	Response 30: Policy 3300 establishes rigorous reporting requirements for charter schools based on identifying existing reporting requirements for non-charter public schools that were appropriate for charter schools. These requirements include student testing, participation in the state accountability

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				system, annual external financial audits, and reporting and certification of common student data elements such as attendance. Policy 3300 also place additional reporting requirements on charter schools face related to their accountability plan and their educational practices.
1/13/20	Jennifer Jones	All charter schools should face the exact same requirements as public schools, including testing, public reporting, and public tax dollars accounted for publicly.	N	In addition to facing many of the same reporting requirements as non-charter public schools, charter schools must participate in additional reporting not required of non-charter public schools. See Response 30 for more detail.
1/13/20	Rebecca Speakman	Every charter school should be required to report educational statistics and achievement to the district school board which can result in closure if results are found to be unacceptable.	A/S	Policy 3300 requires charter schools to report annual performance data to their authorizers, which can result in non-renewal of contracts or closure depending on the results.
1/14/20	Leah Earle	Same as public schools	N	See Response 30.
1/14/20	Tim Hardesty	Verify if Code 18-5G-11(d) includes the requirement to report academic history.	N	Response 31: Policy 3300 provides charter schools with the ability to track academic history using the same electronic transcript platform as non-charter public schools. W. Va. Code §18-5G-11(d) does not refer to reporting on academic history. Academic history is not part of annual certified collection for non-charter public schools so is not included in this provision. However, charter schools must report information required to participate in the statewide accountability system, which includes course credits for high schools. Additionally, Section 9 of Policy 3300

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				places an affirmative responsibility on educators at sending and receiving schools to transmit academic credit and grades in a manner consistent with other student transfers and with the best interest of students in mind.
1/14/20	Ryan Saxe	Verify if Code 18-5G-11(d) includes the requirement to report academic history.	N	See Response 31.
1/14/20	Jedd Flowers	•Verify if Code 18-5G-11(d) includes the requirement to report academic history.	N	See Response 31.
1/14/20	John Treu	For consistency, I recommend adopting the terms “charter public school” and “non-charter public school” throughout Rule 3300 as this is the terminology adopted in the statute (see e.g. W. Va. Code § 18-5G-1).	N	Duplicate comment from Section 3.
1/14/20	Renee Mahon	They should have to report everything to local BOE and state department regularly for everything.	N	See Response 30.
1/14/20	Courtney Martin	Charter schools are not needed. Their reporting requirements are similar, if not the same as non-charter public schools. Let the current public schools in West Virginia have the same "flexibility and innovation" as the charters would. In reading the policy, I am having a hard time discerning the differences between a charter and what we have now, further proving that West Virginia does not need another system in order to be flexible and innovative.	N	See Response 1.
§126-79-11. Education Service Providers.				
11/15/19	Mary Deskins	I am opposed to charter schools. If WV must have them, the school must have a way to ensure they will stay open the whole school year, use only teachers with at least a bachelor's degree, provide teachers will pay equal to at least the same as the public school teachers in that zip code,	N	Duplicate comment from Section 1.

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		institutionalize an audit system that confirms the number of students actually enrolled and attending, be required to have buildings that meet the same safety and comfort standard as the public schools in that zip code, and not allow for-profit businesses to be hired or used for that school.		
11/17/19	Kim Kelly	I am a parent, and I do not want funds for charter schools taken from my daughter's public school.	N	Duplicate comment from Section 1.
11/17/19	Rondalyn Whitney	No to charters	N	Duplicate comment from Section 2
11/18/19	Lisa Weihman	I do not want money that should be going to our public schools used to charter schools. I am sickened that there are legislators in Charleston buying up property and scheming to turn charter schools into private slush funds. The graft and unethical behavior of our legislators in passing this mess is evident to many of us.	N	Duplicate comment from Section 1.
11/20/19	Jason M. Barr	I do NOT want any form or incarnation of charter schools in West Virginia	N	Duplicate comment from Section 1.
11/20/19	Liz	Charter schools must fully meet IEP requirements set by other public schools.	A/C	See Response 15.
11/23/19	Ashlee Curtis	Please see the comment above.	N	Duplicate comment from Section 1.
11/25/19	Laura Perry	Waste of money	N	Duplicate comment from Section 1.
11/25/19	Gibson Terrell	Charters funnel tax money to private businesses. This should be illegal. WV politicians are greedy and they don't want to provide health insurance or retirement programs so they want to outsource education.	N	Duplicate comment from Section 1.
11/26/19	Anh Alderton	No restrictions. Meaning: Teachers don have to be certified, as long as they provide adequate results.	A/S	Pursuant to W. Va. Code §18-5G-1, et. seq., Policy 3300 provides charter schools have greater autonomy over personnel decisions, including qualifications. That said, it establishes a baseline level of qualification for charter school teachers identical to the qualification for

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				alternative certification teachers.
12/3/19	Theodore Webb	charter must provide same educational services as public, adhd, disabilities, integration, busing, developmental, Austism services	A/S	See Response 15.
12/6/19	Margie Okelly	Companies providing management services to charter schools should be non-profit. It is not appropriate in-state or out of state entities to make money off our childrens education, especially if funded by taxpayers. Any "profits" to be made should go directly back to the school to continue supporting our childrens education. It seems unlikely that our childrens best interest would be prioritized over making a profit. (Please review the circumstances with White Hat management in Ohio)	N	See Response 7.
12/11/19	Wendy Peters	The teachers in charter schools should at the very minimum have the same credentials and certification as those in public schools. The policy does not make clear if this is the case.	A/S	See Response 2.
12/21/19	Cheryl Cain	<p>“In Western industrialized nations too, public authorities are increasingly tempted to open their national school systems to the market, whether pushed by conservatives, drew-choice ideologies, blinded by the empty promises of private education entrepreneurs, or influenced by the largest global education fashions.</p> <p>Education is not a commodity. It is an individual as well as a collective right that can only be protected by governments. Public education is one of the few instruments of society to build social cohesion and to achieve equity. It is the first line of defense for nations against attacks on their democratic system, whether coming from the outside or within.</p>	N	Duplicate comment from Section 10.

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		Outsourcing that defense system is irresponsible, if not a symptom of being unbalanced." American Educator Winter 2019-20		
1/2/20	Tanya	If it is about the students and education, why the lenient certification requirements? A knowledge of why/how people learn is necessary to promote learning.	N	See Response 2.
1/3/20	Shawn Wright	We need licensed accredited teachers.	N	See Response 2.
1/7/20	David M Gladkosky	Any ESP that the governing board plans to contract with, must be thoroughly evaluated, and conclude that any outside interests, profitability, or ulterior motives aren going to come into play to jeopardize student success.	A/S	See Response 4.
1/7/20	Jeremy	Period!!!!	N	See Response 1.
1/10/20	Travis Wells	The use of service providers has been shown in other states to be the number one way to extract a profit from a non profit school. Oftentimes, the charter entity is operated by the same entity providing the for-profit services. While technically legal, this unethical process has siphoned millions of dollars away from the educational budgets of other states	N	See Response 4.
1/13/20	Jennifer Jones	All teachers should be completely trained in their fields and carry State Licences.	N	See Response 2.
1/13/20	Rebecca Speakman	Every service provided by the charter school should be given by indefinitely who are qualified by having appropriate degrees and experience. A four year degree and at least one semester of teaching experience should be obtained by every instructor in that school.	N	See Response 2.
1/14/20	Sarah Reggi	I have a great deal of concern regarding ESPs. 11.2.k.9 "If the ESP is or is a subsidiary of a for-profit entity, the terms of the contract that	N	Policy 3300 requires authorizers to review proposed agreements with ESPs. The

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		<p>generate profits are not excessive." What does the WVDE consider excessive profits? Public education, as well as schools labeled as "public charter schools" should not be for-profit.</p> <p>11.2.k.11 A charter school should not rely heavily on educational methods with less direct contact between educators and students. What exactly does this mean/look like? Also, what do you consider adequate oversight of this? Will there be documentation by the ESP and/or governing body concerning this?</p>	A/C	<p>authorizer can determine whether the terms of that agreement are likely to produce improved student outcomes and whether profits are excessive.</p> <p>See Response 19 for limits on virtual instruction. Charter schools may develop other programming, such as internships, that do not involve as much direct contact between educators and students. This provision requires governing boards to provide particularly close oversight to make sure students are receiving appropriate educational experiences through these methods. Policy 3300 empowers authorizers to evaluate whether the governing board has the appropriate oversight measures in place.</p>
1/14/20	Leah Earle	Must provide all services-same as public schools	N	It is not clear what services this comment refers to, especially since different non-charter schools offer different services. In reference to special education and related services, see Response 15.
1/14/20	John Treu	For consistency, I recommend adopting the terms "charter public school" and "non-charter public school" throughout Rule 3300 as this is the terminology adopted in the statute (see e.g. W. Va. Code § 18-5G-1).	N	Duplicate comment from Section 3.
1/14/20	Renee Mahon	Teachers should be licensed and held to same standards as public schools.	N	See Response 2.
1/14/20	Courtney Martin	Allowing 90% of funding to follow a student to a charter school is criminal. Public schools are already grossly underfunded, facilities are not being maintained as they should, and as such, West	N	See Response 3.

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		Virginia has no cause to establish charter schools.		
§126-79-12. Finances.				
11/15/19	James E Hundley	should have the same reporting regulations that private and public institutions are required to have. Also, a Charter school should have a time window of say five years to build a fund that can fund an entire year's instruction to allow the facilitation of the institution to keep them from being unable to finish an instructional year abandoning a student and denying them an education.	A/S	Policy 3300 requires charter schools to meet the same accounting and financial requirements as non-charter public schools and engage in an annual external financial audit that it submits to its authorizer and the state superintendent.
			A/S	See Response 21.
11/15/19	Mary Deskins	I am opposed to charter schools. If WV must have them, the school must have a way to ensure they will stay open the whole school year, use only teachers with at least a bachelor's degree, provide teachers will pay equal to at least the same as the public school teachers in that zip code, institutionalize an audit system that confirms the number of students actually enrolled and attending, be required to have buildings that meet the same safety and comfort standard as the public schools in that zip code, and not allow for-profit businesses to be hired or used for that school.	N	Duplicate comment from Section 1.
11/17/19	Ashley Prichard	Less funding for public education	N	See Response 3.
11/17/19	Kim Kelly	I am a parent, and I do not want funds for charter schools taken from my daughter's public school.	N	Duplicate comment from Section 1.
11/17/19	Rondalyn Whitney	No to charters	N	Duplicate comment from Section 2
11/18/19	Lisa Weihman	I do not want money that should be going to our public schools used to charter schools. I am sickened that there are legislators in Charleston buying up property and scheming to turn charter schools into private slush funds. The graft and unethical behavior of our legislators in passing this mess is evident to many of us.	N	Duplicate comment from Section 1.
11/19/19	Tim Reinard	Do their financial people have to be bonded in	A/C	See Response 25.

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		some manner?		
11/20/19	Jason M. Barr	I do NOT want any form or incarnation of charter schools in West Virginia	N	Duplicate comment from Section 1.
11/20/19	Liz	<p>For a county to authorize a charter school the county must pass an additional educational levy and the charter school levy amount cannot be higher than the regular school levy.</p> <p>Teachers must be paid at the same rate as traditional public schools.</p> <p>For profit companies must put up a bond for the cost of educating students should their charter school fail to meet standards.</p>	<p>N</p> <p>N</p> <p>N</p>	<p>Pursuant to W. Va. Code §18-5G-1, et. seq., Policy 3300 establishes funding guidelines under which 90% of per pupil total basic foundation allowance follows students to charter public schools. Requiring a separate levy for charter schools runs counter to the legislative directive. There is nothing in the law or the policy that would prevent a county board from considering a separate levy to assist in the funding for charter schools.</p> <p>Pursuant to W. Va. Code §18-5G-1, et. seq., Policy 3300 provides charter schools with autonomy over personnel decisions including compensation.</p> <p>Pursuant to W. Va. Code §18-5G-1, et. seq., Policy 3300 establishes that charter schools are governed by non-profit boards and are responsible for meeting accountability measures related to improving student outcomes, including those in the state accountability system. Policy 3300 requires authorizers to evaluate the success of charter schools along these measures, as specified in the charter contract, in order to determine whether a charter contract should be</p>

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				renewed. Governing boards may contract with for-profit education service providers (ESPs). In such cases, Policy 3300 establishes additional evaluation criteria and reporting requirements for charter schools using/planning to education service providers (ESP), including required disclosure of ESP investors and financial entanglements between the ESP and the charter school governing board. Schools operated by ESPs are subject to the same expanded accountability as all charter schools and may be denied renewal for failure to meet expectations.
11/23/19	Ashlee Curtis	As I mentioned in the comment above, I don't believe that charter schools can function appropriately in West Virginia. I am opposed to charter schools in West Virginia and believe that it does violate giving a proper public education to all students. Also, whomever is in charge of the link to the proposed codes needs to fix it so the citizens can actually read these to place informed comments.	N	See Response 1.
11/25/19	Laura Perry	Waste of money	N	Duplicate comment from Section 1.
11/25/19	Gibson Terrell	Charters funnel tax money to private businesses. This should be illegal. WV politicians are greedy and they don't want to provide health insurance or retirement programs so they want to outsource education.	N	Duplicate comment from Section 1.
12/3/19	Theodore Webb	all charter sec filing must review by state and state financial viability study each charter application	A/S	See Response 21.

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		have to prove financial viability for at least 10 years not going to shut down mid school year		
12/6/19	Ethel	Charter school funding should taken assistant superintendent job and use the say for the charter schools.	N	The comment does clearly articulate the requested change.
12/10/19	Renee Mahon	NO MONEY SHOULD BE TAKEN FROM PUBLIC SCHOOLS! THEY NEED TO PAY FOR IT THEMSELVES OR CHARGE TUITION!	N	See Response 3.
12/11/19	Wendy Peters	I am concerned that in the financial impact statement of the policy, the fiscal note is undetermined and that there is no way to project the amount of money that this will cost the state and local boards.		
12/12/19	Nelson Smith	<p>12.2.d.1. – The way this paragraph is written suggests that a charter school will receive in its second year the same allotment is received in its first year, even if the authorized enrollment number increases. Surely this isn't what's intended. This section should be clarified to align payment with any expansion approved in the charter contract – which is in fact the way most charter schools roll out in their first few years, by adding grades.</p> <p>12.7.a. – Notwithstanding the state's desire to retain flexibility considering changes in federal program requirements, it would be advisable here for WVDE to stipulate that it will make good-faith efforts to obtain federal Charter School Program grant funds to assist in startup and implementation of charter schools in the state</p>	<p>A/C</p> <p>A/C</p>	<p>Policy 3300 builds on the school funding process for non-charter public schools, which depends on student enrollment as of October 1 in the prior school year. Recognizing that charter schools may experience large changes in enrollment, especially during start-up periods, Policy 3300 provides for additional funding through the increased enrollment funding mechanism provided for in W. Va. Code §18-9A-15. This will ensure that charter schools and/or county school districts that experience increased enrollment from one year to the next receive the appropriate funding for increased enrollment. Policy 3300 now further clarifies this and requires authorizers and charter schools to address this situation in the agreements governing the timing of funding</p> <p>Policy 3300 now notes WVDE's existing</p>

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				intention to apply for Charter School Program grants.
12/21/19	Cheryl Cain	<p>“In Western industrialized nations too, public authorities are increasingly tempted to open their national school systems to the market, whether pushed by conservatives, drew-choice ideologies, blinded by the empty promises of private education entrepreneurs, or influenced by the largest global education fashions.</p> <p>It education is not a commodity. It is an individual as well as a collective right that can only be protected by governments. Public education is one of the few instruments of society to build social cohesion and to achieve equity. It is the first line of defense for nations against attacks on their democratic system, whether coming from the outside or within. Outsourcing that defense system is irresponsible, if not a symptom of being unbalanced.” American Educator Winter 2019-20</p>	N	Duplicate comment from Section 10.
12/22/19	Kendra	As a parent of 2 children in WV’s public education system, I’m extremely concerned that “public” chart schools will be taking/using funds that should be spend on our current education system. Chart schools in NO WAY help better WV’s public education system.	N	See Response 1.
12/28/19	Andrew	Must follow all wv educational statues.	N	Pursuant to W. Va. Code §18-5G-1, et. seq., Policy 3300 requires charter schools to follow many existing state and federal education policies and laws. However, charter schools are exempt from many statutes or policies that cover non-charter schools.
12/29/19	Chrystalle Doyle	They should not receive full per pupil funding if	N	See Response 9.

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		they do not provide all the same services that public school provides. Giving them the money and excluding students who have no transportation is wrong. It creates a have and have not system. This will cause cherry picking of higher income students with more resources at their disposal and the leaving behind of those who do not.		
12/30/19	Joel	Money should be taken out of the administration budget.	N	See Response 3.
1/2/20	Tanya	A clause stating a said percentage of funds goes directly toward education and support may alleviate concerns. A separate clause for returning money when/if the charter folds is also necessary.	N A/S	<p>Pursuant to W. Va. Code §18-5G-1, et. seq., Policy 3300 does not specific how charter schools use their funding. However, Policy 3300 does direct authorizers to review the education, operational, and financial plans of charter school applicants to determine if said plans suggest that the charter school is reasonably likely to improve student outcomes and meet its educational mission. If an authorizer deems that the application does not specify sufficient funding for instructional or support needs to achieve these aims, it would be grounds to deny the application.</p> <p>Response 32: Pursuant to W. Va. Code §18-5G-10(j)(2), Policy 3300 requires that, when a charter school closes, it transfer remaining funds (including per pupil funding), property, or assets to the county board of education after it has fulfilled 1) outstanding payroll obligations and 2) satisfied the charter school’s creditors. This prioritization may be altered by the</p>

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				decree of a court of law.
1/3/20	Shawn Wright	Do NOT take money from public education & reallocate it to Charter Schools. That is stealing from the majority to give to a minority & Not what is best for West Virginia.	N	See Response 3.
1/4/20	Leslie Haynes	How will the state make certain that the funding follows the student and that education supplies, materials, and staff will be available at both charter and non-charter schools mid-year? Non-charter schools must meet specific purchasing deadlines. Will these deadlines be relaxed or modified with the potential to make purchases or provide services for students who transfer?	N	Non-charter public schools will use the same tools to accommodate students who transfer from charter schools as they would for students transferring from out-of-state or from another non-charter school. Policy 3300 establishes procedures to address charter schools with high rates of student turnover or mid-year transfers. See Response 16 for more information about the review process.
1/5/20	Millie Stoneking	Transportation availability may ultimately exclude students. The exclusion could be distance, arrival and departure times and individual needs.	N	See Response 9.
1/7/20	Mary Baisden	A plan/policy needs put into place to deal with what happens to the money the county paid to the charter schools if charter school closes or is revoked. The county has paid out the money for the entire year already and then if the charter closes the county will take on the financial burden of those students. The same for if students switch from charter back to public mid year- will there be a prorated payment back to the county?	A/S	See Response 32.
1/12/20	Danielle Stewart	12.2.c. like the state, counties should not be responsible for the first year 90%. 12.2.e. Charter schools should be ineligible for increased enrollment funds as the schools have a defined population. If the charter has a defined population in accordance with previous	N N	See Response 3. ... Pursuant to W. Va. Code §18-5G-1, et. seq., Policy 3300 establishes funding provisions for charter schools. To fulfill the intent of code and policy, charter schools

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	<p>requirements of this document then there should be no deviation in overall enrollments.</p> <p>General 12 comment: voters in counties that approve excess levies should not have to provide funding to charter schools from the proceeds of the levy. The levy is designed to provide funds for the public school system.</p> <p>12.3.c. should add that schools that require parents/guardians as part of their transportation plan are ineligible to receive the transportation allowance.</p> <p>12.3. General remark. The charter transportation requirement should be mandatory with costs above county costs to be absorbed by the charter instead of added to the county budget in order to save taxpayer funds.</p> <p>12.4. This allows charter schools to provide better facilities than public schools since the charter can just add their actual expenses, regardless of what the expense is for, to the county budget.</p> <p>12 General Remark. Charters should provide retirement and health benefits that meet state employee standards as a minimum.</p> <p>12.8.a.1 This should be 5 percent versus 1 percent to cover the requirements placed on the authorizer. 1 percent is significantly below needs.</p> <p>12.8.b. Recommended changes to the fee structure</p>	<p>A/S</p> <p>N</p> <p>N</p> <p>N</p> <p>N</p> <p>N</p> <p>A/C</p>	<p>must be eligible for increased enrollment funding. In some years, they may be below their enrollment cap and experience enrollment increases the following year. Additionally, in the early years of a charter school, they may add grade levels each year and will require increased enrollment funding as a result.</p> <p>See Response 9.</p> <p>Pursuant to W. Va. Code §11-8-25, excess levy funds can only be used for the stated purpose. Excess levies that do not include funding for charter will not be used to fund charter schools.</p> <p>Policy 3300 allows for additional funding to county boards to cover actual costs for Step 6a current operations and maintenance. Major capital projects are not included in the Step 6a funding calculations.</p> <p>W. Va. Code §5-16-2 allows funding for charter schools to participate in PEIA and W. Va. Code §18-7A-3 and §18-7B-2 allows charter schools to participate in the Teachers' Retirement System (TRS) and the Teachers' Defined Contribution Retirement System (TDC), but the determination to provide health insurance or retirement to</p>
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		made to WVBE can only be submitted by the authorizer.		employs will be made by the charter school. See Responses 3 and 9. Policy 3300 has been updated to ensure the annual review considers input from authorizers and charter schools.
1/13/20	Dale Lee	12.3.b Charters should be required to provide student transportation if it is receiving money from the transportation allowance for the county. Not providing transportation is a way for charters to select applicants and manipulate their enrollment.	N	See Response 9.
1/13/20	Jennifer Jones	All finances for charter schools should be 100% public knowledge and their finances available to the public of the state.	A/S	See Response 8.
1/13/20	Rebecca Speakman	All financial records should be detailed and transparent and reported periodically to the school district. If financial transparency is not evident, the school should be closed.	A/S	See Response 8.
1/13/20	Rebecca L. Rogers	Resources for education are limited and I object to spending such substantial money on such a narrow population.	N	See Response 3.
1/13/20	Jeremiah Underhill	Section 12.3 Transportation Allowances a. Discusses transportation costs and situations where the charter school does not provide transportation to the students b. We need language in this section such as “The charter school will be responsible for providing	A/C	See Response 15.

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		transportation for any child with a disability as a related service.” c. The child with the disability still may take a public school bus if appropriate, however, the explicit language needs to make it clear that the charter school cannot side step its responsibility to provide appropriate transportation to a child with a disability regardless of whether the charter school provides transportation for students generally (or depends on another resource to provide transportation)		
1/13/20	Lelay Graffious	Chater schools should be publicly funded.	A/S	See Response 3.
1/14/20	Terri Engnoth	Proceeds paid to ESPs and all salaries of staff, teachers, and administration are publicly posted, just like public school finances.	A/S	See Response 8.
1/14/20	Leah Earle	Self funding	N	See Response 3.
1/14/20	Tim Hardesty	The multi-year operating budget should be specified for 5 years.	A/S	Policy 3300 already specifies that the charter school application include a five-year budget in Section 4.
1/14/20	Ryan Saxe	The multi-year operating budget should be specified for 5 years.	A/S	Policy 3300 already specifies that the charter school application include a five-year budget in Section 4.
1/14/20	Jedd Flowers	•The multi-year operating budget should be specified for 5 years.	A/S	Policy 3300 already specifies that the charter school application include a five-year budget in Section 4.
1/14/20	John Treu	For consistency, I recommend adopting the terms “charter public school” and “non-charter public school” throughout Rule 3300 as this is the terminology adopted in the statute (see e.g. W. Va. Code § 18-5G-1).	N	Duplicate comment from Section 3.
1/14/20	Renee Mahon	NO money should be taken from public schools period! Get money from private donations or tuition just like private schools.	N	See Response 3.
1/14/20	Courtney Martin	The legislature has not addressed PEIA funding for	N	Policy 3300 does not address overall

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		ANYONE, let alone charter school employees. If the legislature cannot provide adequate and affordable insurance for the states current public employees, it does not needs to take on a swath of new charter employees.		funding of PEIA.
§126-79-13. Severability.				
11/15/19	Mary Deskins	I am opposed to charter schools. If WV must have them, the school must have a way to ensure they will stay open the whole school year, use only teachers with at least a bachelor's degree, provide teachers will pay equal to at least the same as the public school teachers in that zip code, institionalize an audit system that confirms the number of students actually enrolled and attending, be required to have buildings that meet the same safety and comfort standard as the public schools in that zip code, and not allow for-profit businesses to be hired or used for that school.	N	Duplicate comment from Section 1.
11/17/19	Kim Kelly	I am a parent, and I do not want funds for charter schools taken from my daughter's public school.	N	Duplicate comment from Section 1.
11/17/19	Rondalyn Whitney	No to charters	N	Duplicate comment from Section 2
11/18/19	Lisa Weihman	I do not want money that should be going to our public schools used to charter schools. I am sickened that there are legislators in Charleston buying up property and scheming to turn charter schools into private slush funds. The graft and unethical behavior of our legislators in passing this mess is evident to many of us.	N	Duplicate comment from Section 1.
11/20/19	Jason M. Barr	I do NOT want any form or incarnation of charter schools in West Virginia	N	Duplicate comment from Section 1.
11/23/19	Ashlee Curtis	Please see other comments I have written in other boxes.	N	See prior responses.
11/25/19	Laura Perry	Waste of money	N	See Response 1.
11/25/19	Gibson Terrell	Charters funnel tax money to private businesses.	N	Duplicate comment from Section 1.

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		This should be illegal. WV politicians are greedy and they don't want to provide health insurance or retirement programs so they want to outsource education.		
12/3/19	Theodore Webb	any financial impropriety charter contract should be severed	A/S	Policy 3300 section 8.3.a.5 states that an authorizer may revoke a charter contract at any time if the authorizer determines that "the governing board and/or charter school failed to meet generally accepted standards of fiscal management;".
12/10/19	Renee Mahon	The charter schools need to adhere to all standards! Those standards need to be recorded and given to state department. They should be shut down if standards and policies are not adhered to.	N	See Response 1.
12/21/20	Cheryl Cain	<p>"In Western industrialized nations too, public authorities are increasingly tempted to open their national school systems to the market, whether pushed by conservatives, drew-choice ideologies, blinded by the empty promises of private education entrepreneurs, or influenced by the largest global education fashions.</p> <p>It edu action is not a commodity. It is an individual as well as a collective right that can only be protected by governments. Public education is one of the few instruments of society to build social cohesion and to achieve equity. It is the first line of defense for nations against attacks on their democratic system, whether coming from the outside or within. Outsourcing that defense system is irresponsible, if not a symptom of being unbalanced." American Educator Winter 2019-20</p>	N	Duplicate comment from section 10.
1/2/20	Tanya	There needs to be some recompense if the charter closes. What happens to tax payer monies? A	N	See Response 25 and 32.

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		clause/requirement to return portions to districts may alleviate issues and concerns.		
1/3/20	Shawn Wright ROLE: Parent-Family Harper's Ferry 25425	Charter Schools need to provide food & transportation. I love in Jefferson Co. One if WV's most prosperous & we have a high number of low income students who need lunch & transportation. We should they be excluded from a charter school, just because they can afford food or to get their child to the school.	N	See Response 9. Policy 3300 Section 4 requires charter school applications to contain a description of food services to be provided to students and how those food services shall meet state and federal nutrition standards. As authorizers, county boards of education will determine whether the application demonstrates the ability to accomplish their educational mission.
1/7/20	David M Gladkosky	Thank you for the opportunity to make these comments!	A/S	
1/14/20	Terri Engnoth	If charter schools are ruled by the courts to be independent schools, the contract ends at the end of the school year and control of the charter returns to the county to operate as a public school. If students are found to be in a dangerous situation or setting, the charter school is taken over by the county, and at the end of the school year, the school becomes a public school.	N A/S	See Response 1. Section 8.3 of Policy 3300 specifies that a charter contract may be revoked at any time if the authorizer determines that the health and safety of students attending the charter school is threatened (8.3.a.1).
1/14/20	Ashley Ramsden	If charter schools are ruled by West Virginia courts to be independent schools, the contract ends at the end of the school year and control of the charter returns to the county to operate as a public school. If students are found to be in a dangerous situation or setting by means of potential harm, the charter school is immediately taken over by the county,	N A/S	See Response 1. Section 8.3 of Policy 3300 specifies that a charter contract may be revoked at any time if the authorizer determines that the

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		and at the end of the school year, the school becomes a public school.		health and safety of students attending the charter school is threatened (8.3.a.1).
1/14/20	Leah Earle	No charter schools		Duplicate comment from Section 1.
1/14/20	John Treu	For consistency, I recommend adopting the terms “charter public school” and “non-charter public school” throughout Rule 3300 as this is the terminology adopted in the statute (see e.g. W. Va. Code § 18-5G-1).	N	Duplicate comment from Section 3.
1/14/20	Renee Mahon	If the staff, students and parents say no to charter schools, then there should not be charter schools.	N	See Responses 1 and 22.
1/14/20	Frank Ohara	If charter schools are ruled by the courts to be independent schools, the contract ends at the end of the school year and control of the charter returns to the county to operate as a public school. If students are found to be in a dangerous situation or setting, the charter school is immediately taken over by the county, and at the end of the school year, the school becomes a public school	N A/S	See Response 1. Section 8.3 of Policy 3300 specifies that a charter contract may be revoked at any time if the authorizer determines that the health and safety of students attending the charter school is threatened (8.3.a.1).
1/14/20	John Connor	Since the enabling legislation that allowed for the creation of public charter schools in the state of West Virginia, thereby necessitating this Policy, included a non-severability clause, it seems only fitting that Policy 3300 ought to follow suit and include non-severability language.	N	Policy 3300 includes severability language, as is standard practice for policies of the WVBE.