

1 RE: I-LEAD CHARTER SCHOOL HEARING
2 (VOLUME I)

3 BEFORE: Jeffrey D. Litts, Hearing Officer
4

5 DATE AND TIME: Thursday, January 21, 2016
6 at 9:30 a.m.

7
8 LOCATION: Reading School District
9 Administration Building
800 Washington Street
Reading, Pennsylvania

10
11 APPEARANCES:

12 LEVIN LEGAL GROUP PC
13 By: Allison S. Petersen, Esquire
Paul J. Cianci, Esquire
14 1301 Masons Mill Business Park
1800 Byberry Road
Huntingdon Valley, PA 19006

15
16 Representing Reading School District

17 O'DONNELL ASSOCIATES
18 By: Jeffrey R. Stacey, Esquire
1601 Market Street
Suite 2310
19 Philadelphia, PA 19103

20 Representing I-LEAD Charter School
21

22
23 BERKS COURT REPORTING SERVICE
24 By: Lori A. Dilks, RPR
10 Fox Glen Drive
Sinking Spring, Pennsylvania 19608
25 (610) 678-9984
berkscourtreporting@gmail.com

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

I N D E X

<u>WITNESS</u>	<u>EXAMINED BY</u>	<u>PAGE</u>
Cynda Clyde	Mr. Stacey	15
	Ms. Petersen	35
	Mr. Stacey	71
	Ms. Petersen	74
	Hearing Officer	75
	Ms. Petersen	76
David Castro, Esquire	Mr. Stacey	77
	Ms. Petersen	153
	Mr. Stacey	218
Dr. James F. Bohan	Mr. Stacey	221

EXHIBITS

<u>NUMBER</u>	<u>DESCRIPTION</u>	<u>PAGE</u>
HO-1	Proof of Publication	6
HO-2	Agenda Item from September 23, 2015	7
HO-3	Special Meeting Agenda	7
HO-4	Letter dated September 23, 2015	8

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

P R O C E E D I N G S

HEARING OFFICER: Good morning, ladies and gentleman. My name is Jeffrey D. Litts. I'm an attorney with the law firm of Kegel, Kelin, Almy & Lord of Lancaster, Pennsylvania. I've been appointed by the Board of School Directors for the Reading School District to serve as Hearing Officer in this matter involving the Reading School District and I-LEAD Charter School.

MS. PETERSEN: Excuse me. Can I just interrupt you a second? Can you push the microphone closer because it's not picking anything up.

(Discussion was held off the record.)

HEARING OFFICER: The purpose of this hearing is to deal with two separate issues, which we will be talking a little bit about the logistics of that. But first, we have an Application to Amend the Charter that has been submitted by the I-LEAD Charter School to the Reading School District.

And consistent with discussions with Counsel prior to the hearing, Mr. Stacey will be presenting witnesses, evidence, and testimony with regards to that Charter Amendment request when we start the receipt of evidence, and then there will be an opportunity for cross-examination of any witnesses with regards to their direct testimony on that. It's my

<p>1 understanding that the School District is reserving its 2 right to continue to submit other evidence.</p> <p>3 The second issue that we will address 4 later in the proceeding deal with the School District 5 Administration's presentation of evidence with regard to 6 a proposed revocation of the Charter of I-LEAD Charter 7 School.</p> <p>8 When we reach that phase, it would be the 9 responsibility of Ms. Petersen to present evidence on 10 that through testimony and exhibits, and Mr. Stacey will 11 have an opportunity to cross-examine those folks and then 12 to present evidence in defense of that revocation of the 13 charter school. So that's basically what we'll be doing.</p> <p>14 The proceedings that we'll be having are 15 going to be held in compliance with the Charter School 16 Law and the Local Agency Law. Consistent with those 17 requirements, we do have a Court Stenographer here that 18 will be transcribing those proceedings and swearing in 19 any witnesses that will be testifying through those 20 proceedings, so we will be making a record.</p> <p>21 Additionally, prior to convening today's 22 hearing -- and I very much appreciate the efforts of 23 Counsel to work cooperative together to identify 24 exhibits, both joint exhibits and their own exhibits, and 25 that's why you see a box of binders setting around today.</p> <p style="text-align: right;">4</p>	<p>1 both Counsel are well aware of that, of their burdens 2 that they need to demonstrate for what they're seeking.</p> <p>3 A couple of things I want to put on the 4 record at this point. I'm going to mark as Hearing 5 Officer Exhibit 1, HO-1, a Proof of Publication from the 6 Reading Eagle Company which certifies in a notarized 7 statement that the public hearing notification was 8 advertised in the Reading Eagle on January 9, 2016. The 9 notice states as follows: The Reading School District 10 gives notice of a public hearing under the Charter School 11 Law regarding the Charter School amendment and the 12 Charter School revocation requests for I-LEAD Charter 13 School on the following dates: January 21, 22, 26, 14 February 2, 5, 8 and 9, 2016. All hearing sessions are 15 scheduled for 9:30 a.m. to 5 o'clock p.m. unless delayed 16 or canceled due to inclement weather or other reason, and 17 will be held at the District's Administrative Offices at 18 800 Washington Street, Reading, PA, 19601. Public 19 comment will be scheduled before any final decision on 20 these matters in compliance with the law. So that's 21 marked as HO-1.</p> <p>22 The second thing that I'll be marking as 23 an exhibit is HO-2, which I provided to Counsel, which is 24 a copy of an agenda item from a December [sic] 23, 2015, 25 Board meeting, indicating that a motion was approved to</p> <p style="text-align: right;">6</p>
<p>1 With that, we will make a reasonable effort to try to 2 keep a running log of all those exhibits and share those 3 with Counsel.</p> <p>4 With regards to the logistics of the 5 hearing, this is a public hearing, therefore, members of 6 the public, whether they be School District employees, 7 Charter School employees, or just members of the public 8 or media are free to come and go.</p> <p>9 I would ask that anyone who's in 10 attendance now or in the future engage in common 11 courtesies for the benefit of the Court Stenographer and 12 Counsel. And what I mean by that, please either silence 13 or turn off your cell phones so they don't disrupt the 14 proceedings. Please refrain from engaging in any type of 15 conversations in the hearing room that would interfere 16 with the ability of Counsel to be able to hear the 17 testimony or the Court Stenographer doing that or any 18 type of disruptive comments or conduct.</p> <p>19 And in the event that anyone were to 20 engage in such conduct, we may be required to ask you to 21 leave. I don't anticipate that being a problem, but 22 please note that we do have those expectations.</p> <p>23 I'll forego getting into a deep statement 24 of the law at this time as to the responsibilities of 25 each party, their burdens of proof in this case. I think</p> <p style="text-align: right;">5</p>	<p>1 the attached notice of charges instituting revocation 2 proceedings against I-LEAD Charter School, and that 3 motion was carried with the Resolution attached.</p> <p>4 The purpose of me including this as a 5 Hearing Officer exhibit is, on the last page of that 6 Resolution, it authorized the appointment of a Hearing 7 Officer presiding over these proceedings, to administer 8 oaths and affirmations, issue subpoenas, make all 9 necessary evidentiary rulings and to receive evidence, 10 hold appropriate conferences before or during the 11 hearings, dispose of procedural matters and motions, take 12 other action necessary or appropriate to the discharge of 13 duties consistent with statutory or other authority, 14 certify the record and prepare proposed findings of fact 15 and conclusions of law and a proposed Adjudication to the 16 Board within 30 days of the completion of the hearing 17 process, including briefing thereof. That's HO-2.</p> <p>18 We have also marked and shared with 19 Counsel HO-3, which is a copy of a December 16, 2015 20 special meeting agenda with an agenda item with an 21 attached Resolution to appoint myself as the Hearing 22 Officer for purposes of proceeding with I-LEAD's request 23 to amend the Charter, and that Resolution specifically 24 authorizes me to do all the things I previously explained 25 with regard to the request to amend the Charter that was</p> <p style="text-align: right;">7</p>

<p>1 then submitted by I-LEAD Charter School.</p> <p>2 Finally, I have premarked as Hearing</p> <p>3 Officer Exhibit 4 a copy of a December 23, 2015 letter,</p> <p>4 which had been addressed to Allison Petersen and Jeffrey</p> <p>5 Stacey, confirming certain understandings that was</p> <p>6 reached with the attorneys as to the hearing session</p> <p>7 schedule, the submission of witness and exhibit lists</p> <p>8 between the Counsel, the advertisement of the hearing,</p> <p>9 the proposed briefing schedule and other procedural</p> <p>10 matters. So I wanted to have those on the record.</p> <p>11 I know prior to the hearing we had</p> <p>12 several conference calls. One of the things that it's my</p> <p>13 understanding that Mr. Stacey wanted to place on the</p> <p>14 record, and to preserve his objection, is the appointment</p> <p>15 of the Hearing Officer to hear both of these matters. Is</p> <p>16 that correct, Mr. Stacey?</p> <p>17 MR. STACEY: That's correct.</p> <p>18 HEARING OFFICER: That issue is</p> <p>19 preserved. I know, Ms. Petersen, you previously shared</p> <p>20 with me a letter pointing out your legal arguments why</p> <p>21 you believe those objections should be dismissed. Is</p> <p>22 that correct?</p> <p>23 MS. PETERSEN: That's correct.</p> <p>24 HEARING OFFICER: We have that. I have</p> <p>25 reviewed the cases with regards to the appointment of a</p> <p style="text-align: right;">8</p>	<p>1 The School District's concern with that</p> <p>2 was -- and they may correct me if I'm wrong -- that the</p> <p>3 School District did not want to waive what they perceived</p> <p>4 a defense to an amendment request to be, which is to</p> <p>5 bring up revocation issues under Section 1729-A of the</p> <p>6 Charter School Law.</p> <p>7 We agreed to bifurcate these hearings in</p> <p>8 such a way so that those revocation issues are brought up</p> <p>9 during the revocation phase of this hearing.</p> <p>10 HEARING OFFICER: As I understood the</p> <p>11 agreement -- and I'll ask it by both Counsel to see if I</p> <p>12 have this correct -- Mr. Stacey will be presenting, I</p> <p>13 believe it was, five witnesses, and the cross-examination</p> <p>14 by the School District attorneys will be limited to their</p> <p>15 direct testimony of that piece.</p> <p>16 The School District is reserving its</p> <p>17 right to rely upon certain evidence that may be submitted</p> <p>18 in the, quote, revocation phase in support of their</p> <p>19 arguments against any amendment request. And both</p> <p>20 parties, after all that evidence is submitted on the</p> <p>21 record, could rely upon any part of the record with</p> <p>22 regards to their respective arguments on the amendment</p> <p>23 issue.</p> <p>24 Is that an accurate -- is my recollection</p> <p>25 correct per the conference call?</p> <p style="text-align: right;">10</p>
<p>1 Hearing Officer for purposes of Charter School Revocation</p> <p>2 proceedings. There's a Commonwealth Court case at</p> <p>3 Coatesville, which I believe addresses the issue that it</p> <p>4 is appropriate for the Board to designate a Hearing</p> <p>5 Officer to do the very things I've been asked to do and,</p> <p>6 therefore, we will proceed and we'll address that in more</p> <p>7 detail and any proposed adjudication that will be</p> <p>8 forthcoming after the conclusion of the proceedings.</p> <p>9 So that is what I have as far as</p> <p>10 procedural matters. Is there any other issues that we</p> <p>11 need to address?</p> <p>12 MS. PETERSEN: Nothing from the School</p> <p>13 District.</p> <p>14 MR. STACEY: We had a conference call</p> <p>15 yesterday regarding the scope of what is going to be</p> <p>16 discussed on the record today, and that had to do with</p> <p>17 these two phases of the hearing that you've been</p> <p>18 discussing. So our position was we don't want to be in</p> <p>19 the position of prosecuting our amendment case while also</p> <p>20 defending against the revocation case.</p> <p>21 And so what we agreed to on that call is</p> <p>22 that evidence will be put forth by the Charter School</p> <p>23 today, including testimony. Those witnesses who testify</p> <p>24 may be cross-examined as to matters raised on the direct</p> <p>25 testimony.</p> <p style="text-align: right;">9</p>	<p>1 MR. CIANCI: It is, yes. And I just</p> <p>2 wanted to elaborate just a little bit, just to put on the</p> <p>3 record part of our motivation, and that is that we want</p> <p>4 to be sure that we're complying with the precedence of</p> <p>5 the CAB, specifically the Penn Hills case from September</p> <p>6 of 2015, such that the arrangement that you have just</p> <p>7 confirmed and that we discussed yesterday would comply</p> <p>8 with the strictures of that case.</p> <p>9 We are looking at this case as one case,</p> <p>10 which is just going to be litigated in two separate</p> <p>11 parts, but at the end of the case we will be able to make</p> <p>12 arguments and point to evidence from both aspects of the</p> <p>13 case to establish either the defense of the amendment</p> <p>14 case or the propriety of the revocation.</p> <p>15 HEARING OFFICER: Do you have any problem</p> <p>16 with that, Mr. Stacey?</p> <p>17 MR. STACEY: None.</p> <p>18 HEARING OFFICER: That was my</p> <p>19 recollection and, Paul, thank you for stating that.</p> <p>20 We're going to work cooperatively through this. This is</p> <p>21 a little bit unique that we have to bullet two separate</p> <p>22 issues, but we'll do that. So with that understanding,</p> <p>23 that's how we'll proceed with the presentation of</p> <p>24 evidence.</p> <p>25 We're going to have the witnesses that</p> <p style="text-align: right;">11</p>

<p>1 are testifying sit on my left, closer to the Court</p> <p>2 Stenographer, and we do have various binders of exhibits</p> <p>3 setting over there so we can give those to the witness.</p> <p>4 So I've made my preliminary remarks as to</p> <p>5 the procedures. At this point in time, I should have</p> <p>6 asked this earlier, if Counsel for each of the parties</p> <p>7 identify themselves for the record so I'll go with the</p> <p>8 Charter School first.</p> <p>9 MR. STACEY: Jeffrey Stacey, O'Donnell</p> <p>10 Associates, for I-LEAD Charter School.</p> <p>11 HEARING OFFICER: The School District?</p> <p>12 MS. PETERSEN: Allison Petersen from the</p> <p>13 Levin Legal Group for the School District.</p> <p>14 MR. CIANCI: And Paul Cianci from the</p> <p>15 Levin Legal Group for the School District.</p> <p>16 HEARING OFFICER: Unless there's anything</p> <p>17 else at this point in time, Mr. Stacey, I'll let you</p> <p>18 proceed.</p> <p>19 MR. STACEY: Thank you, Mr. Lifts. I</p> <p>20 represent the I-LEAD Charter School which submitted a</p> <p>21 request for an amendment to its Charter on</p> <p>22 September 21st, 2015.</p> <p>23 There are essentially two main reasons</p> <p>24 for that request. One is to address discrete issues, the</p> <p>25 academic goals on which the Charter School should be</p> <p style="text-align: right;">12</p>	<p>1 responsibilities of the Charter School and of the School</p> <p>2 District.</p> <p>3 You'll hear evidence regarding all of the</p> <p>4 above, and we hope at the conclusion it will become clear</p> <p>5 that this amendment to the Charter is necessary for a</p> <p>6 whole host of reasons.</p> <p>7 HEARING OFFICER: Okay. And you're going</p> <p>8 to be reserving any comment?</p> <p>9 MS. PETERSEN: Yes. Thank you. I've</p> <p>10 asked to reserve any opening statement until an</p> <p>11 appropriate time after we've heard the Charter School's</p> <p>12 evidence. In support of the amendment request, we are</p> <p>13 certainly interested in hearing more about what the</p> <p>14 amendment specifically is seeking because we've not been</p> <p>15 given much clarity in that regard, at least that's the</p> <p>16 position we're in at the present time.</p> <p>17 So I think once we have heard the Charter</p> <p>18 School's information and evidence, we'll be in a better</p> <p>19 position to set forth an opening statement on that</p> <p>20 matter, and we'll also reserve any opening statement</p> <p>21 relative to the revocation proceedings until a later date</p> <p>22 when it's appropriate to make that as well.</p> <p>23 HEARING OFFICER: Mr. Stacey, would you</p> <p>24 like to call your first witness?</p> <p>25 MR. STACEY: The Charter School calls</p> <p style="text-align: right;">14</p>
<p>1 evaluated, an acknowledgement of the facility that the</p> <p>2 Charter School now inhabits, and then to address various</p> <p>3 governance issues, including the composition of the Board</p> <p>4 of the Charter School.</p> <p>5 In addition to those discrete issues,</p> <p>6 there is another issue which we believe is the bigger</p> <p>7 issue, which is that from the time the revised</p> <p>8 application for the Charter School was submitted to the</p> <p>9 present, there have been a number of changes made which</p> <p>10 has had a number of effects legally and a number of</p> <p>11 effects factually that have resulted in conflict between</p> <p>12 the parties; the parties thinking the Charter says one</p> <p>13 thing, and the other party thinking the Charter says</p> <p>14 another thing.</p> <p>15 We're seeking the amendment to clarify on</p> <p>16 those main points what the appropriate standard should</p> <p>17 be, and what the appropriate rights and responsibilities</p> <p>18 of I-LEAD Charter School and the Reading School District</p> <p>19 are.</p> <p>20 We're not seeking the amendment so that</p> <p>21 the Hearing Examiner or the School Board can divine the</p> <p>22 intent of the parties as to what was meant in the Charter</p> <p>23 Agreement and what was agreed to, but rather</p> <p>24 prospectively moving forward to acknowledge and to</p> <p>25 recognize the standards and the appropriate rights and</p> <p style="text-align: right;">13</p>	<p>1 Cynda Clyde.</p> <p>2 CYNDA CLYDE</p> <p>3 was called as a witness and, having been first duly sworn</p> <p>4 by the Reporter-Notary Public, was examined and testified</p> <p>5 as follows:</p> <p>6 BY MR. STACEY:</p> <p>7 Q. Good morning, Ms. Clyde.</p> <p>8 A. Good morning.</p> <p>9 MR. STACEY: I missed that. Did she state</p> <p>10 and spell her name for the record, or should I ask each</p> <p>11 witness?</p> <p>12 THE REPORTER: Not for the record, but you</p> <p>13 can go ahead.</p> <p>14 BY MR. STACEY:</p> <p>15 Q. Can you please state and spell your name for</p> <p>16 the record?</p> <p>17 A. Yes, Cynda Clyde, C-Y-N-D-A, C-L-Y-D-E.</p> <p>18 Q. Ms. Clyde, where are you currently employed?</p> <p>19 A. At I-LEAD, Inc.</p> <p>20 Q. And I-LEAD, Inc., is not I-LEAD Charter</p> <p>21 School. Is that correct?</p> <p>22 A. Correct.</p> <p>23 Q. How long have you been employed at I-LEAD,</p> <p>24 Inc.?</p> <p>25 A. For eight years.</p> <p style="text-align: right;">15</p>

1 Q. And what is your position there?
2 A. I'm currently serving as the Assistant
3 Director of Development.
4 Q. Have you had any other titles at Inc.?
5 A. Yes. I was the Director of the Talent and
6 Growth Initiative, which was an internship program. And I
7 have not by title, but have participated in several other
8 projects, including proposal writing, marketing material
9 development, research and policy analysis.
10 Q. You said seven years. You've been there
11 since about 2008. Is that right?
12 A. Yes.
13 Q. Were you involved in any way with the
14 Charter applications filed with the Reading School
15 District?
16 A. Yes, I was a participant, but not a member,
17 of the Advisory Board that was convened kind of during the
18 application process and edited the application, did not
19 author it, but edited it.
20 Q. Just so we're clear, when you refer to the
21 application, are you referring to both the original
22 application and the revised application?
23 MS. PETERSEN: Objection. I'm just going
24 to object based on leading. Can you ask some
25 foundational questions?

16

1 HEARING OFFICER: Were you involved with
2 the Advisory Board -- with what application?
3 THE WITNESS: With the original Charter
4 School Application.
5 BY MR. STACEY:
6 Q. Were you also involved on the Advisory Board
7 for the revised?
8 A. And for the revised, yes, for both. I'm
9 sorry.
10 Q. What is your professional background?
11 A. I've held a variety of positions with
12 non-profit organizations in the greater Philadelphia area,
13 mainly in the arena of work-force development.
14 Q. Thank you. Was the revised Charter
15 application approved by the Reading School District?
16 A. Yes.
17 Q. Once that Charter was approved, did you have
18 a role with the Charter School?
19 A. Yes. I was a part of startup and performed
20 a variety of functions, developed marketing materials,
21 interfaced with the press at times, and performed some
22 other writing type related functions and communications in
23 general with the players that were involved in the startup
24 process.
25 Q. When you say startup process, are you

17

1 referring to the period prior to the school's first year of
2 operation?
3 A. Yes, that six-month period from January to
4 September -- well, I guess that's nine months, but, yes,
5 including the recruitment process.
6 Q. Which year was that?
7 A. That would be 2011.
8 Q. So the first school year was the 2011/2012
9 school year?
10 A. Yes.
11 Q. Have you ever worked directly for the
12 Charter School?
13 A. Yes. I transitioned to service full-time
14 Academic Data Analyst for the 2012/2013 school year.
15 Q. When you say transitioned, what do you mean?
16 A. I had been participating in activities
17 related to the Charter School, but not actually working for
18 and attending the School every day as my place of work and
19 my location work and reporting to paid staff of the Charter
20 School.
21 Q. As the Academic Data Analyst, what did you
22 do?
23 A. I collected and analyzed students' incoming
24 grades and transcript information, as well as initial
25 literacy and numeracy assessments, performed both upon

18

1 enrollment and also during the year. And I also was
2 responsible for a portion of entering the transcripts into
3 the school's data base, eSchoolPLUS.
4 Q. What was the last part of that?
5 A. ESchoolPLUS, the name of the data
6 management.
7 Q. I jumped ahead. Can I have you open the big
8 binder that says Binder 2 of 2?
9 A. This one (indicating).
10 (Witness complies.)
11 MR. STACEY: I just want the record to
12 reflect this is Charter School Exhibit 10.
13 BY MR. STACEY:
14 Q. Ms. Clyde, there's a lot of pages here. Can
15 you thumb through and tell us if you recognize these
16 documents?
17 A. Yes. The first page I see here is a
18 printout of a student transcript from the eSchoolPLUS
19 system for -- I don't know if it's a current -- for a
20 current student?
21 Q. To the extent you can tell, do all of these
22 documents appear to be printouts of transcripts from the
23 eSchoolPLUS system?
24 A. Yes. That's what I see. Wow, there are a
25 lot.

19

<p>1 Q. You stated that as part of your job as 2 Academic Data Analyst, you had involvement with 3 transcripts. Can you explain that involvement in a little 4 bit more detail?</p> <p>5 A. Sure. Upon enrollment and acceptance to 6 the Charter School, student information was collected or 7 submitted to both the Enrollment Manager and the School 8 Guidance Counselor staff, and that included transcripts 9 from the school of origin.</p> <p>10 Those transcripts were placed in student 11 files, and those files were apportioned among the 12 Enrollment Manager, Counselor staff, and myself to enter 13 into the eSchoolPLUS system.</p> <p>14 Q. So you did not receive transcripts when 15 students came into I-LEAD --</p> <p>16 A. Correct.</p> <p>17 Q. -- in this form?</p> <p>18 A. Correct. No.</p> <p>19 Q. They were in a variety of forms?</p> <p>20 A. They were in whatever form the school of 21 origin presented them to us in.</p> <p>22 Q. So part of your job was recording from that 23 original data, translating that into the eSchoolPLUS 24 system?</p> <p>25 A. Yeah, I would say more transcribing. There</p> <p style="text-align: right;">20</p>	<p>1 MS. PETERSEN: Objection. Leading.</p> <p>2 HEARING OFFICER: Overruled. I'll let 3 her answer the question.</p> <p>4 THE WITNESS: Yes, it was.</p> <p>5 BY MR. STACEY:</p> <p>6 Q. So all the data that came in on the 7 transcripts included everything we see here?</p> <p>8 A. Correct.</p> <p>9 Q. Can you point to anything on this page that 10 would have been not provided in those transcripts?</p> <p>11 A. No. No.</p> <p>12 Q. Thank you. Towards the bottom of the page 13 there are two columns. One says Type and one says GPA. Do 14 you see that?</p> <p>15 A. Yes.</p> <p>16 Q. Are those columns automatically populated by 17 the eSchool system, or is that also something that you 18 transcribed?</p> <p>19 A. To the best of my recollection, no, that 20 was directly transferred as well. Yes, that was directly 21 transferred.</p> <p>22 Q. You can close that binder.</p> <p>23 A. (Witness complies.)</p> <p>24 Q. Can you, in the smaller binder -- that 25 appears to be one -- refer to Tab 4?</p> <p style="text-align: right;">22</p>
<p>1 was no translation involved. It was purely transcribing.</p> <p>2 Q. If you just flip to the first page, when you 3 say transcribing -- well, let me ask the question this way. 4 Can you explain what information you would have put into 5 eSchoolPLUS and what -- scratch that.</p> <p>6 So if you're reviewing a transcript, you put 7 in the classes that an individual took?</p> <p>8 A. Yes.</p> <p>9 Q. So if we're looking at this first page of 10 Exhibit 10, the first school year represented is the 11 2008/2009 school year. Do you see that?</p> <p>12 A. Yes.</p> <p>13 Q. So you would have put in the student took 14 these courses, Algebra II, for example?</p> <p>15 A. Yes.</p> <p>16 Q. Citizenship?</p> <p>17 A. Yes.</p> <p>18 Q. And you would have put in their final letter 19 grade for that?</p> <p>20 A. Yes.</p> <p>21 Q. Would you have also put in attempted credit 22 and earned credit?</p> <p>23 A. Yes.</p> <p>24 Q. Was something like attempted credit listed 25 on the transcript?</p> <p style="text-align: right;">21</p>	<p>1 HEARING OFFICER: Mr. Stacey, are you 2 referring to Binder 1 of 2 of your --</p> <p>3 MR. STACEY: That's correct, Charter 4 School Exhibit 1 of 2.</p> <p>5 HEARING OFFICER: Thank you.</p> <p>6 BY MR. STACEY:</p> <p>7 Q. Do you recognize this document?</p> <p>8 A. Yes, I do.</p> <p>9 Q. Could you tell us generally what it is?</p> <p>10 A. Yes. This could be understood as an Annual 11 Report. We were telling the story of the impact of the 12 Charter School on students during the first two years of 13 operation, as well as describing the student body for the 14 general public.</p> <p>15 Q. Did you have a hand in creating this 16 document?</p> <p>17 A. Yes, I authored everything but the academic 18 plan in the document.</p> <p>19 Q. Can you explain a little bit about the 20 circumstances of creating this document?</p> <p>21 A. Per --</p> <p>22 Q. Let me scratch that. Did you write this 23 document during your time as Academic Data Analyst for the 24 Charter School?</p> <p>25 A. Yes.</p> <p style="text-align: right;">23</p>

<p>1 Q. And I see the date on the front here is</p> <p>2 '12/13 dated September of 2013. When was this document</p> <p>3 created?</p> <p>4 A. It was completed in August of 2013.</p> <p>5 Q. You described this document as a report. Is</p> <p>6 this a document purporting to be an Annual Report with</p> <p>7 capital A, capital R?</p> <p>8 A. No. No. No.</p> <p>9 Q. This is something different?</p> <p>10 A. This is an informal report, again, telling</p> <p>11 the story about our students intended for public</p> <p>12 consumption. It was not -- is not a formal document</p> <p>13 required by the State Board of Education or the School</p> <p>14 District.</p> <p>15 Q. Did anyone at I-LEAD Charter School direct</p> <p>16 you and/or others to create this document?</p> <p>17 A. Yes. David Castro and Angel Figueroa.</p> <p>18 Q. And did they tell you how they intended the</p> <p>19 document to be used?</p> <p>20 A. I believe they used those exact words, that</p> <p>21 we want to tell the story of the positive impact the School</p> <p>22 has had on our students' lives and on the community.</p> <p>23 Q. Before we get to the content, do you know</p> <p>24 whether this document was sent to Reading School District</p> <p>25 Administration?</p> <p style="text-align: right;">24</p>	<p>1 Page 5?</p> <p>2 A. This data was derived from or downloaded,</p> <p>3 rather, from Achieve 3000, which is an online assessment</p> <p>4 program that the School used to measure the lexile or</p> <p>5 reading levels of incoming learners. Lexile just meaning</p> <p>6 reading levels of students.</p> <p>7 Q. So in terms of the chart, is what's being</p> <p>8 shown there, that big piece of the pie based on the data</p> <p>9 from the Achieve 3000, that 85 percent of students are</p> <p>10 three years or more below grade level in reading?</p> <p>11 A. Correct.</p> <p>12 MS. PETERSEN: Objection. Leading.</p> <p>13 HEARING OFFICER: Sustained.</p> <p>14 BY MR. STACEY:</p> <p>15 Q. Can you please explain to us what the</p> <p>16 various pieces of the pie in the chart mean?</p> <p>17 A. Exactly as it's labeled, that the vast</p> <p>18 majority, 85 percent as noted, of incoming I-LEAD Charter</p> <p>19 School students read at three or more years below grade</p> <p>20 level. And, again, it states as well that almost half read</p> <p>21 at an elementary school level, no matter whether they're</p> <p>22 9th -- incoming 9th, 10th, 11th or 12th graders.</p> <p>23 Q. So you had direct access to this Achieve</p> <p>24 3000 data?</p> <p>25 A. Yes. I had administrative rights to this</p> <p style="text-align: right;">26</p>
<p>1 A. I do remember preparing copies of the</p> <p>2 report for said distribution for physical, I think,</p> <p>3 delivery.</p> <p>4 Q. Do you know whether it was sent to the</p> <p>5 Administration or to the School Board?</p> <p>6 A. I am confident that it was physically</p> <p>7 delivered to School Board members, as well as</p> <p>8 Administration members. Yes.</p> <p>9 Q. Can you turn to Page 5 of the document? The</p> <p>10 number's on the bottom. At the top of the page is Academic</p> <p>11 Profile. Do you see that?</p> <p>12 A. Yes.</p> <p>13 Q. Can you tell us what's happening here on</p> <p>14 Page 5? Just generally describe it, and then maybe a</p> <p>15 little bit more specifically go into the details in the</p> <p>16 chart.</p> <p>17 A. Yes. This is exactly what the title says,</p> <p>18 an Academic Profile of incoming learners for that school</p> <p>19 year. And it, again, tells the story that incoming Charter</p> <p>20 School students are severely academically behind in</p> <p>21 writing, at least by three grade levels, almost half of</p> <p>22 them were reading at an elementary school level, and that</p> <p>23 this is for incoming 9th, 10th, 11th and 12th graders.</p> <p>24 Q. What assessment was utilized -- scratch</p> <p>25 that. Where did you get the data for this chart shown on</p> <p style="text-align: right;">25</p>	<p>1 third party online source from which I downloaded the data.</p> <p>2 Q. What is the Achieve 3000, just so we know?</p> <p>3 A. It's an online program, a cloud-based</p> <p>4 program that -- assessment tool that would measure</p> <p>5 students' lexile levels or their reading levels. It also</p> <p>6 has imbedded within online lessons that students could</p> <p>7 participate in that were targeted directly to their reading</p> <p>8 level.</p> <p>9 Q. Can you flip to Page 6, please?</p> <p>10 A. (Witness complies.)</p> <p>11 Q. Can you read that first sentence at the top</p> <p>12 of Page 6?</p> <p>13 A. To put this in perspective, the majority of</p> <p>14 incoming ILCS, I-LEAD Charter School, learners would have</p> <p>15 to increase their reading levels by five grades to be able</p> <p>16 to read national newspapers. Keep going?</p> <p>17 Q. And that's based on the data from the</p> <p>18 Achieve 3000?</p> <p>19 A. Correct. As well as research as noted in</p> <p>20 that footnote, that newspapers are written on a 8th grade</p> <p>21 reading level.</p> <p>22 Q. And the remainder of Page 6, can you</p> <p>23 describe what's going on in that page?</p> <p>24 A. Yes. This represents another snapshot of</p> <p>25 the academic levels of incoming I-LEAD Charter School</p> <p style="text-align: right;">27</p>

<p>1 students done by Acuity, which measures both language arts</p> <p>2 ability, as well as mathematical -- not ability, restate</p> <p>3 that -- math levels, current mathematical levels and</p> <p>4 current reading levels.</p> <p>5 And as you can see in that or as is</p> <p>6 depicted there in this pie chart, language arts, again,</p> <p>7 50 percent score -- this is on -- Acuity is on a 100 point</p> <p>8 scale, and the vast majority, 62 percent of incoming I-LEAD</p> <p>9 Charter School students scored 50 percent or below in the</p> <p>10 language arts assessment, and another quarter scored just</p> <p>11 51 to 75 percent, another quarter, another 25 percent of</p> <p>12 the student body. So only 14 percent scored 76 to 100,</p> <p>13 which would be considered a passing mark.</p> <p>14 Q. Am I correct that the chart on Page 6 is the</p> <p>15 language arts assessment?</p> <p>16 A. Correct. This is the language arts section</p> <p>17 of Acuity. And Acuity also measures, again, math levels.</p> <p>18 So the math assessment is then on Page 7. And the students</p> <p>19 performed at an even lower level in that math assessment</p> <p>20 where 88 percent of incoming learners scored 50 percent or</p> <p>21 below on this mathematical assessment. And 12 percent</p> <p>22 scored from 51 to 75 percent on this assessment and,</p> <p>23 therefore, virtually no incoming students had a passing</p> <p>24 grade -- had a passing mark in mathematical levels upon</p> <p>25 entry to I-LEAD Charter School.</p> <p style="text-align: right;">28</p>	<p>1 remember what documents or data were used in your</p> <p>2 preparation of the remainder of the report? And you can</p> <p>3 flip through and note anything, if you'd like.</p> <p>4 A. I referenced, to the best of my ability,</p> <p>5 the kind of technical reports for Achieve 3000 and Acuity</p> <p>6 to understand where those scores were derived from. I</p> <p>7 utilized transcripts to take a look at GPA's, as well as</p> <p>8 GPA's as they've changed. They changed over that school</p> <p>9 year when the student was with us.</p> <p>10 And the Curriculum section I was not an</p> <p>11 author of. That was designed by the Academic Team.</p> <p>12 Q. Can you identify that section, please?</p> <p>13 A. It begins on Page 9 of 37 and largely goes</p> <p>14 to Page 14. And then there's further description of kind</p> <p>15 of the requirements for teacher quality and evaluation.</p> <p>16 That, as well, was done by the Academic Team, and that's</p> <p>17 Page 15 and 16, Pages 15 and 16.</p> <p>18 Q. You said you reviewed transcripts regarding</p> <p>19 calculations of GPA?</p> <p>20 A. Yes.</p> <p>21 Q. Did that review lead to you drafting the</p> <p>22 things that we see on Pages 17 through --</p> <p>23 MS. PETERSEN: Objection. Leading.</p> <p>24 THE WITNESS: In the subsequent section,</p> <p>25 Page --</p> <p style="text-align: right;">30</p>
<p>1 Q. You keep referring to incoming learners.</p> <p>2 What do you mean by that?</p> <p>3 A. Meaning new students, meaning students who</p> <p>4 are beginning with I-LEAD Charter School in this new year.</p> <p>5 Q. This would have been students incoming to</p> <p>6 I-LEAD in the '12/13 school year?</p> <p>7 A. Correct.</p> <p>8 Q. Can you walk me through when a student</p> <p>9 enrolls in I-LEAD approximately when they take either the</p> <p>10 Achieve 3000 or these Acuity assessments?</p> <p>11 A. Achieve at that time, Achieve 3000, was</p> <p>12 part of the orientation process. So that would have</p> <p>13 happened upon initial entry into the School, which largely</p> <p>14 would have been in the fall.</p> <p>15 Acuity was used as a snapshot, as an</p> <p>16 academic snapshot, to measure students in real time,</p> <p>17 students' academic levels in real time. So they were</p> <p>18 assessed, I believe, in November of that year and then as</p> <p>19 well in the spring, and that would be the wider student</p> <p>20 body, actually. Yeah.</p> <p>21 Q. But to the extent you know, the charts on 5,</p> <p>22 6 and 7 refer to students taking those tests right when</p> <p>23 they came in in the fall?</p> <p>24 A. Yes.</p> <p>25 Q. For the remainder of the document, do you</p> <p style="text-align: right;">29</p>	<p>1 MS. PETERSEN: Hold on. There's an</p> <p>2 objection.</p> <p>3 THE WITNESS: I'm sorry.</p> <p>4 MR. STACEY: Can I respond to that?</p> <p>5 HEARING OFFICER: Sure.</p> <p>6 MR. STACEY: Under the Local Agency Law,</p> <p>7 I mean, we're not in Federal Court here. We're not bound</p> <p>8 by the strict Rules of Evidence. It has been my</p> <p>9 experience in the past with Counsel of Record on both</p> <p>10 sides here, that some leading is permitted during</p> <p>11 direct-examination.</p> <p>12 HEARING OFFICER: You are correct, the</p> <p>13 strict Rules of Evidence don't apply to the Local Agency</p> <p>14 Law. Just keep it in mind because we're probably going</p> <p>15 to have these issues come up at different points in time.</p> <p>16 I don't want questions trying to suggest to a witness</p> <p>17 what they should say, but if we're simply directing</p> <p>18 somebody to a page number, I don't have a problem with</p> <p>19 that. So I believe you were referring to Page 17 of the</p> <p>20 report?</p> <p>21 MR. STACEY: Yes.</p> <p>22 HEARING OFFICER: Why don't we turn to</p> <p>23 Page 17 and ask the question, again, Mr. Stacey.</p> <p>24 BY MR. STACEY:</p> <p>25 Q. Ms. Clyde, can you explain your review of</p> <p style="text-align: right;">31</p>

<p>1 transcripts and how that informed Pages 17 through 20 of 2 your report?</p> <p>3 A. So on Page 17 is depicted a chart that is 4 the cumulative GPA, which would have been listed on the 5 transcript and again transcribed by me and other members of 6 the staff into eSchoolPLUS. So it's their cumulative GPA 7 entry versus the student's GPA, their final GPA at the 8 conclusion of the 2012/2013 school year.</p> <p>9 And what's demonstrated is that the -- 10 which is difficult to see in black and white text because 11 the graphs are in color -- is that the cumulative GPA is 12 lower, that the GPA of students increased during that 13 school year while they were with us.</p> <p>14 And similarly, Page 18 presents the Acuity 15 scores for those -- the spring, I believe, Acuity scores, 16 which measured both language arts and math, again, also 17 having increased for that same -- I compared apples to 18 apples in this chart, the same pool of students.</p> <p>19 And then the math assessment scores are 20 presented on 19, also depicting an increase in scores for 21 students.</p> <p>22 MR. STACEY: I do want to note, I apologize 23 for the black and white copies of things like charts. 24 Certainly at the request of the Hearing Examiner or the 25 other party, I can provide colored copies. I tried to do</p> <p style="text-align: right;">32</p>	<p>1 was -- how did students change, what were the strengths, 2 what were the challenges ongoing.</p> <p>3 If we would wait for standardized test 4 results, then we would be a year behind in designing our 5 curriculum and our academic response. So these tools 6 provided us real time data to design instruction in the 7 classroom targeted to learner specific challenges.</p> <p>8 Q. What is the mission of the I-LEAD Charter 9 School?</p> <p>10 A. To provide an alternative education for 11 students in the 9th through 12th grades that is focused on 12 leadership and prepares them both for college and for life.</p> <p>13 MR. STACEY: I don't have any further 14 questions.</p> <p>15 HEARING OFFICER: Cross-examination? 16 MS. PETERSEN: I do. Bear with me a 17 second.</p> <p>18 BY MS. PETERSEN:</p> <p>19 Q. Ms. Clyde, good morning. 20 A. Good morning. 21 Q. You just referenced in your last statement 22 the mission of the I-LEAD Charter School. Is that the 23 mission that is reflected in the revised application 24 submitted by the Charter School? 25 A. The spirit of it, yes. The words may not</p> <p style="text-align: right;">34</p>
<p>1 that in some of our exhibits, but some were overlooked, so 2 I apologize.</p> <p>3 BY MR. STACEY:</p> <p>4 Q. Ms. Clyde, the data that you discussed 5 that's contained in this report and reported in each of 6 these charts and graphs and paragraphs, are these 7 representations you've made true and accurate, to the best 8 of your knowledge, information and belief?</p> <p>9 A. Yes, absolutely.</p> <p>10 Q. Do you know whether Achieve 3000 and Acuity 11 assessments or GPA is used by the Commonwealth of 12 Pennsylvania to assess student performance?</p> <p>13 A. GPA would be a standard academic measure 14 certainly performed or used at all schools. I do not know 15 if Acuity and Achieve are used.</p> <p>16 Q. Do you know why I-LEAD Charter School would 17 utilize assessments such as the Achieve 3000 or the Acuity 18 assessments?</p> <p>19 A. We wanted to establish baseline academic 20 levels through Achieve with our students to really take a 21 snapshot of where they are when they came to the Charter 22 School so that we could target instruction accordingly and 23 design curriculum accordingly.</p> <p>24 And that would go, again, for Acuity being 25 administered both in the fall and the spring to see what</p> <p style="text-align: right;">33</p>	<p>1 be exactly correct, no.</p> <p>2 Q. You just made that up in your testimony 3 here?</p> <p>4 A. Absolutely not. I believe that I have the 5 -- absolutely not. Again, the spirit of the exact words of 6 the mission statement I did not quote, no, but the purpose 7 thereof I believe I represented accurately.</p> <p>8 Q. Well, the mission that you just related to 9 us, is that a mission that's written down anywhere by the 10 Charter School in writing?</p> <p>11 A. That exact mission statement that I just 12 replied? No.</p> <p>13 Q. You said I believe in the beginning of your 14 testimony that you had a role in preparing the revised 15 application for the Charter School. Is that correct?</p> <p>16 A. Yes.</p> <p>17 Q. And what was that role?</p> <p>18 A. More editing the document to ensure that 19 all the pieces were there and in the right place.</p> <p>20 Q. You didn't have a role in creating the 21 language that was used in the revised application then; you 22 just edited it?</p> <p>23 A. It was a Team effort. I know there was a 24 consultant that had been hired, so it was a Team effort. 25 Which pieces I edited, which pieces I may have contributed</p> <p style="text-align: right;">35</p>

1 to, I can't state specifically.
2 Q. Did you have a role in writing the mission
3 statement that's set forth in the revised application?
4 A. No.
5 Q. Now, I want to go back through your
6 employment history that you related. I believe you
7 testified that you've been the Assistant Director of
8 Development for I-LEAD, Inc., serving in that role for
9 eight years starting in 2008?
10 A. Yes.
11 Q. Do you continue serving in that role?
12 A. Yes.
13 Q. Have you ever not served in that role since
14 2008?
15 A. Yes.
16 Q. When was that?
17 A. That was in 2012 to '13, as well as 2013 to
18 '14.
19 Q. And is that because you were working for the
20 Charter School at that point in time?
21 A. Yes, correct. I was.
22 Q. Were you always working for the Charter
23 School in the position of Academic Data Analyst?
24 A. I worked initially doing some development
25 work and some development of marketing materials as well,

36

1 and that would have been in the fall of 2011.
2 Q. Were you working for the I-LEAD, Inc., at
3 the same time you were doing the marketing work for the
4 Charter School?
5 A. I worked half-time -- essentially, my
6 full-time responsibilities were with the Charter School,
7 but my salary was split between the two organizations.
8 Q. So you were compensated by both entities?
9 A. Yes.
10 Q. And in terms of the work that you did for
11 the Charter School starting then in the fall of 2011 -- is
12 that correct, that's when it started?
13 A. Yes.
14 Q. -- you testified that you were doing some
15 marketing work, some communications work, and what else?
16 A. That's what I recall my main
17 responsibilities were.
18 Q. How long did that last in terms of the work
19 that you were doing while you were working for both
20 entities?
21 A. Primarily just that fall, maybe halfway
22 into that spring, I believe. Yeah.
23 Q. So that would have been --
24 A. So fall of 2011 and then January to March,
25 January, February --

37

1 Q. And that would have been in the --
2 A. -- of 2012. So, yes, in 2011/2012 school
3 year.
4 Q. And then did you stop working for the
5 Charter School and continue working for I-LEAD, Inc., for a
6 period of time?
7 A. No, that would be when my role transitioned
8 to the Academic Data Analyst for the Charter School.
9 Q. And when did you officially begin in the
10 that role?
11 A. Actually, officially I believe it was the
12 fall, so it would have been 2012/2013 with that exact title
13 being assigned. Yes.
14 Q. I'm not sure I just understood your answer.
15 At what point in time did you start working only for the
16 Charter School? Do you have a specific date?
17 A. And are you referring to responsibilities,
18 or are you referring to salary?
19 Q. In terms of being compensated by the Charter
20 School.
21 A. Full-time compensation was not until the
22 2013/2014 school year.
23 Q. At what point in time in the year did you
24 begin?
25 A. I was a full-time employee, so fiscal year,

38

1 which would have been July 1.
2 Q. So you started with the Charter School in
3 that role of Academic Data Analyst as of July 1st, 2012?
4 A. Yes.
5 Q. And you continued in that same role for how
6 long?
7 A. For a year and a half.
8 Q. Until what date?
9 A. Until 2014.
10 Q. Can you be more specific?
11 A. Yeah, I believe it was March.
12 Q. March of 2014?
13 A. Yes.
14 Q. And as of March, 2014, what caused your role
15 or employment to change?
16 A. My understanding was that I was part of the
17 layoff, so there were budgetary constraints.
18 Q. Did you then go back to work at I-LEAD,
19 Inc.?
20 A. Yes.
21 Q. And you're continuing to work at I-LEAD,
22 Inc., to this day?
23 A. Yes.
24 Q. And did you go back to work at I-LEAD, Inc.,
25 with the title of Assistant Director of Development?

39

1 A. Yes.

2 Q. And what sort of work have you been

3 performing at I-LEAD, Inc., since you returned there in

4 March, 2014?

5 A. Prepared some proposals of performed policy

6 analysis, have researched educational legislation, beefed

7 up my work force development knowledge, participated in the

8 flag ship program of I-LEAD, Inc., which is the ACE college

9 program, and have facilitated communications in that

10 program, as well as served as a Director of a new

11 initiative that was operative for one year, the Talent

12 Growth Initiative, which was an internship program at the

13 Charter School and among our college students, but I was

14 only working with the college students.

15 Q. Do you hold any certifications in the State

16 of Pennsylvania?

17 A. No.

18 Q. What is your educational background?

19 A. I have a Bachelor's degree in Urban Studies

20 from Brown University and an M.B.A. from Eastern University

21 in Economic Development.

22 Q. And have you ever taught in a school in

23 Pennsylvania?

24 A. No.

25 Q. Have you ever had any role as an

40

1 Administrator in a school in Pennsylvania?

2 A. No. I was considered support staff at the

3 Charter School --

4 Q. In your role as --

5 A. -- designated as same.

6 Q. -- Academic Data Analyst?

7 A. Yes.

8 Q. So in terms of that role, I heard you state

9 earlier that you were responsible for data entry relative

10 to information that was grade information that was received

11 for students and entering that into the Charter School's

12 own systems. Is that accurate?

13 A. Yes, only transcripts, however, from the

14 schools of origin.

15 Q. Did you have any responsibility for issuing

16 assessments to any student?

17 A. No. I made sure that their names were in

18 the Achieve system accurately, and that they would be --

19 the system actually assigned assessments to students, to an

20 active list of students, so delivering assessments, no.

21 Q. In terms of reviewing those assessments data

22 once they were returned, did you have any responsibility

23 for reviewing that data?

24 A. I downloaded the scores, so the sum total

25 of the scores and could see students' responses on

41

1 particular questions for Acuity, but not for Achieve.

2 Q. Did you say you could see student responses

3 on questions in Acuity?

4 A. Yes. They have a particular report where

5 you can observe students' responses because it provides a

6 more robust and detailed analysis of the students'

7 responses vis-a-vis the State standards, again, to inform

8 instruction.

9 Q. And those student responses, specific

10 responses were shared with you as a Data Analyst?

11 A. I had access to them. It's a locked data

12 set because it's an online assessment, so I could download

13 reports per student or cumulative, summative type of

14 reports.

15 Q. Did you then share that information with

16 anyone?

17 A. Yes. There were only -- there were very

18 few staff who kind of had that level of access. I shared

19 specific data with teachers, but with the Principal of the

20 School, with the Academic Lead, and with the Reading

21 Specialist at the time.

22 Q. And who was the Principal at the time?

23 A. Yamil Sanchez. Dr. Yamil Sanchez.

24 Q. Y-A-M-I-L. Was Mr. Sanchez the Principal

25 the entire time you were employed by the Charter School?

42

1 A. Yes.

2 Q. So he was still there in March of 2014?

3 A. He left -- I honestly am blanking whether

4 our times -- yes, I believe so.

5 MR. CIANCI: Can you speak up a little

6 bit?

7 THE WITNESS: I believe so.

8 MR. CIANCI: Thank you.

9 BY MS. PETERSEN:

10 Q. And in terms of --

11 A. My memory just clicked in. He finished out

12 the academic year.

13 Q. Which one?

14 A. 2014.

15 Q. He was there for the entirety of the '13/14

16 school year, is that what you're saying?

17 A. I think so.

18 Q. Now, when you entered that data and you

19 shared it with other folks at the Charter School, were you

20 then involved in conversations with them regarding the

21 data?

22 A. I, yes, presented essentially kind of the

23 summative type of findings that are presented here in this

24 report. Yes.

25 Q. And they relied on you to provide that

43

1 information to them?
2 A. Yes. It was one piece of incoming
3 information by which the academic response overall of the
4 School was designed. Yes.
5 Q. In terms of Charter School Exhibit 4 and the
6 sections of the report that you referenced as authoring,
7 were you the only person that was involved in authoring
8 those sections?
9 A. Yes.
10 Q. So Mr. Sanchez was not involved in the
11 preparation of the report?
12 MR. STACEY: I think his title was
13 Doctor.
14 BY MS. PETERSEN:
15 Q. I apologize. Dr. Sanchez.
16 A. Dr. Sanchez, again, was involved with the
17 academic section of the report where the academic program
18 and curriculum and teacher quality and evaluation pieces
19 are described, that is his work, I believe, and the
20 Academic Team, but the data reports themselves are purely
21 mine.
22 Q. So Dr. Sanchez did not have a role in
23 preparing the sections of the report that you previously
24 identified as preparing?
25 A. Correct. He reviewed them.

44

1 Q. I have some questions regarding Charter
2 School Exhibit 10. Ma'am, you indicated that you entered
3 the data for all of the folks included within Charter
4 School Exhibit 10. Is that accurate?
5 A. No. I can't say specifically which
6 students I entered and which ones I did not, as well as I
7 had mentioned the responsibilities were divided between
8 myself, the Enrollment Manager, and the counseling staff,
9 the School Counselor. I did the majority. Yes.
10 Q. I'm sorry. I must have missed that the
11 first time around. So you didn't actually enter the data
12 for every student that enrolled at I-LEAD?
13 A. Not for every single student, no.
14 Q. So you would agree with me, you didn't enter
15 any of the data for any student at I-LEAD prior to assuming
16 your position as the Data Analyst; correct?
17 A. Incorrect, because the title was conferred
18 in, again, July 1 of 2013, and I was performing transcript
19 entry as of, I believe, March of that year.
20 Q. March of 2013?
21 A. Yes.
22 Q. So then it's fair that you didn't enter any
23 data for any student at I-LEAD prior to March of 2013?
24 A. Yes.
25 Q. And then after March of 2013, after you

45

1 assumed that role, you're also saying you didn't enter the
2 information for every student?
3 A. Correct.
4 Q. There were other folks involved in that data
5 entry?
6 A. Correct.
7 Q. Did you supervise those folks?
8 A. No.
9 Q. Did you go back and double-check their work?
10 A. Sometimes, yes, but I do not have the
11 expertise to supervise those folks. The School Counselor
12 and then the Academic Lead of the School was responsible
13 for that.
14 Q. Did you review their work in terms of them
15 entering grades into I-LEAD's system?
16 A. No.
17 Q. So you don't know what they entered and what
18 they didn't?
19 A. We divided student files, so I would enter
20 the full information for the files of the students that I
21 had, which are full transcript information that were
22 assigned to me, I entered fully, so the transcripts were
23 not divided. And then there are other staff members who
24 also entered transcripts as well.
25 Q. So if looking at Charter School Exhibit 10,

46

1 please --
2 A. Yes.
3 Q. -- which one of the kids in Charter School
4 Exhibit 10 did you enter the information from?
5 A. I can't name that. I did hundreds.
6 Q. You can't identify any single student within
7 Charter School Exhibit 10?
8 A. No.
9 Q. You can't identify any single student whose
10 information you entered in Exhibit 10?
11 A. I cannot, but I can tell you that I knew
12 the names of most of the students. If you gave me a first
13 name at the time, I could provide a last name. So I knew
14 the student information and the student names, but, no, I
15 cannot identify specifically which ones I entered.
16 Q. If you look at the first page on Exhibit 10,
17 you would agree with me that this particular student with
18 the initials S.A. is not even reflected as having attended
19 I-LEAD?
20 A. That would look to be correct. Yes.
21 Q. And the transcript information that's
22 represented on this first page for this student, S.A.,
23 would have been entered prior to your employment at the
24 Charter School; correct?
25 A. No, not necessarily. If a student -- no.

47

1 If a student came to us, then their entire high school
2 academic record is what we would enter. So if they came to
3 us to be entered as an 11th grader, an incoming 11th
4 grader, then their 10th grade information as is depicted
5 here and their 9th grade information would have been
6 entered into the system. We would have received that
7 transcript.
8 Q. But there's no indication of when this
9 particular student enrolled in I-LEAD; correct?
10 A. On this transcript, no. Within the
11 eSchoolPLUS system, there would be an enrollment date.
12 Q. And you've not presented that information
13 here today; correct?
14 A. Not that I'm aware of.
15 Q. Can you turn to Page 3?
16 A. (Witness complies.)
17 Q. With the student with initials D.T., do you
18 see that?
19 A. Yes.
20 Q. You would agree with me that this student
21 enrolled in I-LEAD Charter School in the 2011/2012 school
22 year?
23 A. Yes.
24 Q. So you would not have been the person
25 responsible for entering this transcript information for

48

1 the student's previous school; correct?
2 A. Correct.
3 Q. That would have predated your employment?
4 A. Correct.
5 Q. Turn to Page 5, please.
6 A. (Witness complies.)
7 Q. The students initials are C.S. Do you see
8 that?
9 A. Yes.
10 Q. There's a date on this document of entry
11 into I-LEAD Charter School in the 2005/2006 school year.
12 Do you see that?
13 A. I do see that.
14 Q. That could not possibly be correct, could
15 it?
16 A. No.
17 Q. I-LEAD Charter School wasn't even in
18 existence in that school year; correct?
19 A. That's correct.
20 Q. As I'm paging through Charter School
21 Exhibit 10, it appears to me that all of the transcripts
22 that are included are I-LEAD generated transcripts. Is
23 that correct?
24 A. It appears that way. Yes.
25 Q. Were you responsible for putting Charter

49

1 School Exhibit 10 together?
2 A. No.
3 Q. Did you review Charter School Exhibit 10
4 before testifying today?
5 A. No.
6 Q. And you would agree with me that there is no
7 transcript or other grade information from the sending
8 schools from which students would have come from within
9 Exhibit 10; correct?
10 A. Correct, not that -- I've not flipped
11 through the entire thing, but I see only transcripts.
12 Q. Sitting here today, can you verify the
13 grades that are identified in Charter School Exhibit 10 for
14 any single student?
15 A. It should be Grades 9, 10, 11 and 12.
16 Q. I think you misunderstand my question. Let
17 me clarify. So in terms of the actual grades for courses
18 that are reflected in the transcripts, sitting here today,
19 can you verify the accuracy of any single grade for any
20 single course for any single child that's represented in
21 the transcripts?
22 A. I can say with confidence that they were
23 transcribed accurately to the best of our ability from the
24 -- again, from the transcripts from the School of origin.
25 Q. To the best of your ability; right?

50

1 A. Yes.
2 Q. But you don't have the backup data to
3 support that here today?
4 A. Here today, no. I'm sure it's on file at
5 the School. The students' original transcripts were
6 maintained.
7 Q. But they've not been presented within
8 Exhibit 10; correct?
9 A. Not that I see, no.
10 Q. You testified about Charter School
11 Exhibit 4, if you could turn to that, please.
12 A. (Witness complies.)
13 Q. I believe you indicated on
14 direct-examination that this is not, in fact, the formal
15 Annual Report for the Charter School; correct?
16 A. Correct.
17 Q. Do you know what an Annual Report is?
18 A. I know there is such a document required by
19 the Department of Education, but that's about it.
20 Q. Have you ever seen the Charter School's
21 Annual Report for the '12/'13 school year?
22 A. No, I don't believe so.
23 Q. So I assume it's fair to say that --
24 A. In its final form I did not see it.
25 Q. Did you have any role in preparing the

51

1 official Annual Report for the Charter School for the
2 '12/13 school year?
3 A. No.
4 Q. Do you know if that's been presented by the
5 Charter School in these proceedings?
6 A. I do not know.
7 Q. Are you familiar with the format of the
8 official Annual Report that gets submitted to the State?
9 A. No.
10 Q. Is it fair to say then that you don't know
11 if any data that is presented in the report that's attached
12 as Charter School Exhibit No. 4 correlates with data that's
13 presented to the State in the official Annual Report?
14 A. I could not state whether that is or is not
15 the case.
16 Q. Is the information that's conveyed in
17 Charter School Exhibit 4 all data for the previous school
18 year?
19 A. Meaning -- because it's the Charter School
20 2012/2013, so there's data in there from -- I believe it
21 included 2011/2012, as well, but this is the first time
22 I've looked at this document -- or rather recently looked
23 at this document for over two years, so....
24 Q. When you say this is the first time, you're
25 talking about here today?

52

1 A. No, no, but in recent -- within the week.
2 Q. To prepare for this hearing?
3 A. Yes.
4 Q. And you haven't looked at this document
5 prior to that for roughly two years?
6 A. Correct.
7 Q. So it's your testimony then that there is
8 data reflected in Charter School Exhibit 4 for both the
9 '11/12 and the '12/13 school year?
10 A. That's what I recall including. Yes.
11 Q. Which data -- can you point out to me where
12 in the report there is data for the '11/12 school year?
13 A. I believe incoming learners may have --
14 upon entry -- no, I'm trusting what I wrote at the time and
15 so I'm reading my own footnotes.
16 (Witness reviewed document.)
17 I believe incoming learners was 2011/2012,
18 as well as '12/13.
19 Q. Can you point out what page you're looking
20 at?
21 A. Page 5. And I'm happy to subsequently dig
22 into this data and into my records, but, again, I haven't
23 looked at the document intimately for any -- and the
24 preparation thereof for about two years time. So speaking
25 specifically to the derivation of the data from exact years

53

1 to say which data that came where, I can't say at this
2 time.
3 Q. So in terms of the graph that appears on
4 Page 5 of Charter School Exhibit 4, are you saying then
5 that the information conveyed in the graph could be a
6 combination of information for both the '11/12 and the
7 '12/13 school year?
8 A. Yes.
9 Q. Do you know with certainty?
10 A. I'm 90 percent sure that -- yes.
11 Q. Now, at the top of the page there's language
12 that says, Internal assessments conducted during our second
13 year reveal that 92 percent of learners who entered during
14 the '12/13 school year read below a 9th grade level. Do
15 you see that?
16 A. I do.
17 Q. Is that supposed to correlate with the graph
18 that's at the bottom of the page?
19 A. I can't say. It does not specifically.
20 Q. And sitting here today, are you sure that in
21 terms of the 92 percent figure, that it was related only to
22 the '12/13 school year?
23 A. Yes. If I made that statement in this
24 report, it's accurate.
25 Q. Have you provided the Hearing Officer and

54

1 the School District with the background data that was
2 analyzed to support that statement?
3 A. No.
4 Q. That's not presented as any part of the
5 exhibit; correct?
6 A. Not that I'm aware of, no.
7 Q. And what students are reflected within that
8 statement?
9 A. The statement, Reading and math upon entry
10 to ILCS? I'm reading the first sentence of the report,
11 Learners reading and math skills levels upon entry to
12 I-LEAD Charter School are far below grade level. Is that
13 the group that you're referring to?
14 Q. Yes. So who?
15 A. So who? These are students who are
16 incoming, who would be those students upon entry to ILCS,
17 so upon -- ILCS, I-LEAD Charter School, those students upon
18 enrollment.
19 Q. Can you identify any of them by name?
20 A. No.
21 Q. How many of them were there?
22 A. I would have to look at my background data
23 to answer that question at this time.
24 Q. Did you look at your background data before
25 testifying today?

55

<p>1 A. I did not.</p> <p>2 Q. Did you create any document that you then</p> <p>3 used to prepare Charter School Exhibit 4 or your portions</p> <p>4 of Charter School Exhibit 4?</p> <p>5 A. Yes, several spreadsheets, worksheets.</p> <p>6 Yes.</p> <p>7 Q. And you haven't provided that information to</p> <p>8 us today?</p> <p>9 A. Not that I'm aware of, no.</p> <p>10 Q. So in terms of the 92 percent, out of how</p> <p>11 many students was that?</p> <p>12 A. Again, I cannot speak to that exact number</p> <p>13 at this time.</p> <p>14 Q. So then looking at the graph at the bottom</p> <p>15 of the page, how many students are represented within that</p> <p>16 graph?</p> <p>17 A. Again, I cannot speak to the exact number</p> <p>18 of students at this time.</p> <p>19 Q. If you could turn to the next page, please,</p> <p>20 was any part of the data that was referenced in Charter</p> <p>21 School Exhibit 4 from the '13/14 school year?</p> <p>22 A. No. It couldn't have been.</p> <p>23 Q. So if you look at the graph on Page 6, it</p> <p>24 says, quote, Acuity language arts assessment learner scores</p> <p>25 upon entry to ILCS snapshot fall of 2013, end quote. Do</p> <p style="text-align: right;">56</p>	<p>1 A. No.</p> <p>2 Q. There would have been some sort of list of</p> <p>3 Acuity scores for students that was generated. Is that</p> <p>4 correct?</p> <p>5 A. It was downloaded. The data used to</p> <p>6 generate these charts was downloaded, again, from the</p> <p>7 Acuity and the Achieve online data bases. So there would</p> <p>8 have been electronic reports that were generated. Yes.</p> <p>9 Q. But that has not been presented to us;</p> <p>10 correct?</p> <p>11 A. Not that I'm aware of, no.</p> <p>12 Q. At what point in time did each of the</p> <p>13 students who are reflected on Graph 6 enter the Charter</p> <p>14 School?</p> <p>15 A. It could have been, again, throughout</p> <p>16 2011/12 or 2012/13. We had a -- not by name, but a rolling</p> <p>17 admission kind of process.</p> <p>18 Q. In what grade levels did they enter?</p> <p>19 A. All grade levels, 9th, 10th, 11th and 12th.</p> <p>20 Q. Were students retested using the Acuity</p> <p>21 assessments at any point after entry?</p> <p>22 A. Yes. As I had mentioned, the Acuity</p> <p>23 assessment was administered twice annually in the fall and</p> <p>24 then in the spring in order to provide a real time academic</p> <p>25 snapshot of students' abilities.</p> <p style="text-align: right;">58</p>
<p>1 you see that?</p> <p>2 A. I do.</p> <p>3 Q. You would agree with me that the fall of</p> <p>4 2013 would be within the '13/14 school year; correct?</p> <p>5 A. This actually, the date references, I</p> <p>6 recall is when I created kind of this graph. The snapshot</p> <p>7 is more about the production of the graph than about the</p> <p>8 student scores that are represented here.</p> <p>9 Q. Well, when were the scores that are</p> <p>10 represented here actually achieved by students?</p> <p>11 A. Either in 2011/12 or 2012/13.</p> <p>12 Q. You don't know sitting here today?</p> <p>13 A. I do not.</p> <p>14 Q. How many students are represented in that</p> <p>15 graph on Page 6?</p> <p>16 A. I cannot speak to the exact number at this</p> <p>17 time.</p> <p>18 Q. And you can't identify any particular</p> <p>19 student that's included in that graph; correct?</p> <p>20 A. I cannot. Again, it's been over two years</p> <p>21 since I've performed the function of Academic Data Analyst</p> <p>22 or been employed at the School and interfaced with this</p> <p>23 data.</p> <p>24 Q. Have you supplied any of the data to us that</p> <p>25 was used to create the graph on Page 6?</p> <p style="text-align: right;">57</p>	<p>1 Q. And it looks like the graphs on Page 6 and 7</p> <p>2 reflect the Acuity scores upon entry. Is that correct?</p> <p>3 A. Correct.</p> <p>4 Q. That's entry into the Charter School;</p> <p>5 correct?</p> <p>6 A. Correct, though they represent -- though we</p> <p>7 had a rolling admissions process, it's those who we had at</p> <p>8 the time that I created this report. So I had a cut-off</p> <p>9 date. There was one assessment that was administered. I</p> <p>10 took the scores from that particular assessment.</p> <p>11 Q. Does the report attached as Charter School</p> <p>12 Exhibit 4 provide the Acuity assessment data for students</p> <p>13 when they were retested after being served by the Charter</p> <p>14 School for some period of time?</p> <p>15 A. I believe so. And that's in the GPA</p> <p>16 section, Page 18 and 19. So those retained learners, those</p> <p>17 who remained with I-LEAD Charter School, who also took the</p> <p>18 exam -- not exam -- who also took the assessment that fall,</p> <p>19 this represents the difference between that particular</p> <p>20 group of students upon entry and then in the spring.</p> <p>21 Q. Which students are reflected in this</p> <p>22 document?</p> <p>23 A. Again, by name, I cannot name them.</p> <p>24 Q. How many students are reflected in this</p> <p>25 document?</p> <p style="text-align: right;">59</p>

<p>1 A. Again, I cannot give you an exact number at 2 this time. I know we made our best effort to test 3 students, all of them, to assess all of the students. 4 Q. Do you know if all of the students were 5 tested? 6 A. I -- the vast majority were. Yes. 7 Q. And on Page 18, the graphs, the two 8 different graphs both use the words, retained learners. 9 A. Yes. 10 Q. Do you see that? What does that mean? 11 A. That means that a student entered I-LEAD 12 Charter School and then remained with us through that year. 13 Q. Do you know how many students were retained? 14 A. I, again, cannot speak to that exact number 15 at this time. 16 Q. So students that left the I-LEAD Charter 17 School in the middle of the year might have been reflected 18 on the graph on Page 6 and 7, but were not reflected on the 19 graph in Page 18? 20 A. That might be correct; however, the 21 assessment scores, the second cut of the students, I know I 22 used only their scores. I compared themselves to 23 themselves, kind of the spring and the fall in looking at 24 the increases. 25 Q. So are you saying then that in the graphs on 60</p>	<p>1 lexile level through this online system. But their lexile 2 level, that was measured only once and, perhaps, at the end 3 of the year. 4 Q. So you don't have corresponding Achieve 3000 5 data to show differences between the student's entry grade 6 level -- or the student's entry data versus the student's 7 data upon being enrolled at the Charter School for some 8 period of time? 9 A. Correct. The set of students was not 10 sufficient to produce an analysis. It wouldn't inform us. 11 The number of students who took the achieve assessment at 12 the conclusion of the year was too small of a group to 13 include in this analysis. 14 Q. Okay. So how many students took the Achieve 15 3000 data at entry? 16 A. The vast majority, but I cannot speak to a 17 number. 18 Q. How many students took it at the end of the 19 year? 20 A. Again, a smaller number, but I cannot give 21 you the exact number at this time. 22 Q. As the Data Analyst for the Charter School 23 at the time, do you recall what the minimum number of 24 students needed to be in order to have statistically 25 significant data? 62</p>
<p>1 Page 6 and 7, if a student hadn't remained at the Charter 2 School until the second testing window with Acuity, their 3 scores were not included on the graphs on Page 6 and 7? 4 A. No, I think they were. 5 Q. So Page -- 6 A. To the best -- 7 Q. So Page 6 and 7 may reflect different kids 8 than Pages 18 and 19? 9 A. Page 6 and 7 reflect a larger pool of kids 10 than 18 and 19. 18 and 19 reflect the segment of that pool 11 of kids represented on 6 and 7 who were retained in that 12 school year. 13 Q. Sitting here today, do you know how many 14 kids are reflected in 6 and 7 versus 18 and 19? 15 A. Sitting here today, I cannot speak to that. 16 No. 17 Q. You had also on Page 5 indicated that that 18 graph was reflective of Achieve 3000 data. Do you see 19 that? 20 A. Correct. Yes. 21 Q. Is Achieve 3000 administered different times 22 in a student's life at the Charter School? 23 A. No. Achieve was administered upon entry to 24 give us a baseline reading level, a baseline lexile level, 25 and then students could engage in lessons to increase their 61</p>	<p>1 A. No. 2 Q. You don't recall if it was less than 50? 3 A. I don't recall. 4 Q. I'm not sure if I asked you this. If I did, 5 I apologize. We don't have any background data that you 6 used to support the Achieve 3000 scores presented today; 7 correct? 8 A. Correct. 9 Q. And the same question for the Acuity scores? 10 A. Correct. 11 Q. In terms of the Acuity data that's on 12 Page 18 -- 13 A. Yes. 14 Q. -- that top graph -- 15 A. Yes. 16 Q. -- what is the bottom axis? 17 A. What is the bottom? That would be a zero 18 percent on the assessment score on a scale from zero to a 19 hundred. 20 Q. Well, I guess I'm confused because the data 21 is sort of showing a line, a diagonal line, for lack of a 22 better term, up the page which to me means that there 23 should be something on the bottom axis to correspond to why 24 the data is moving that way. 25 A. There are individual scores of students 63</p>

<p>1 that are reflected, I believe.</p> <p>2 Q. Well, but in terms of why they're moving</p> <p>3 across the page as they're moving, how was that determined?</p> <p>4 What caused it to move across the page that way?</p> <p>5 A. That's purely a list of the individual</p> <p>6 students' names, I believe, that were the X axis.</p> <p>7 Q. The X axis. So are you saying that there</p> <p>8 were individual student names that were identified on the X</p> <p>9 axis?</p> <p>10 A. Yes. And then their particular scores are</p> <p>11 marked according to this hundred percent -- hundred point</p> <p>12 scale.</p> <p>13 Q. And you would agree with me that those</p> <p>14 numbers don't appear on this page?</p> <p>15 A. Correct.</p> <p>16 Q. How is the reader supposed to know what</p> <p>17 scores correlate with what student?</p> <p>18 A. I can say that was an imperfection in the</p> <p>19 presentation of the graph, but I also didn't want -- there</p> <p>20 were no student names that were going to be included in</p> <p>21 this report.</p> <p>22 Q. So in terms of the Y axis, the vertical</p> <p>23 axis, in terms of the percentages that appear there, what</p> <p>24 do they correlate with?</p> <p>25 A. Correlate, again, with the scores that the</p> <p style="text-align: right;">64</p>	<p>1 to different Acuity testing dates?</p> <p>2 A. Yes, as is depicted and described in the</p> <p>3 paragraph directly above the chart, the different</p> <p>4 administrations are listed.</p> <p>5 Q. And how many students -- strike that. How</p> <p>6 are individual student scores represented on the different</p> <p>7 testing dates in the chart?</p> <p>8 A. Again, each point on the chart corresponds</p> <p>9 to a student -- a specific student score.</p> <p>10 Q. How do we know which ones, which students</p> <p>11 score is for which student for each of the three dates?</p> <p>12 A. As a reader you would not. This is color</p> <p>13 coded, so you'd know which test administration is depicted.</p> <p>14 The overall message of the chart is that longitudinally</p> <p>15 student scores increased because the arc -- the slope of</p> <p>16 the curve increases for the year, for each year.</p> <p>17 Q. How would we understand that as a reader?</p> <p>18 A. This is why it's both presented in visual</p> <p>19 as well as written form.</p> <p>20 Q. If you could turn to the previous page,</p> <p>21 Page 17.</p> <p>22 A. (Witness complies.)</p> <p>23 Q. You had referenced this graph as</p> <p>24 representative of GPA's.</p> <p>25 A. Correct.</p> <p style="text-align: right;">66</p>
<p>1 students achieved on the Acuity language arts assessment.</p> <p>2 Q. So with a hundred percent being the best</p> <p>3 score?</p> <p>4 A. Correct.</p> <p>5 Q. So you had students that were in the 90th</p> <p>6 percentile?</p> <p>7 A. Yes.</p> <p>8 Q. And the 80th percentile?</p> <p>9 A. It appears that way. Yes.</p> <p>10 Q. And the 70th percentile?</p> <p>11 A. Yes.</p> <p>12 Q. How many students were within each of the</p> <p>13 percentiles?</p> <p>14 A. I could not speak from this graph. I would</p> <p>15 have to go to the informing data.</p> <p>16 Q. So you don't know then how many students in</p> <p>17 the totality are included on the graph?</p> <p>18 A. At this time, no.</p> <p>19 Q. And then it appears that there's three</p> <p>20 different dates referenced in the graph.</p> <p>21 A. Correct.</p> <p>22 Q. September 1st, 2012; December 1st, 2012; and</p> <p>23 June 1st, 2013. Do you see that?</p> <p>24 A. Yes.</p> <p>25 Q. And am I correct that those dates correspond</p> <p style="text-align: right;">65</p>	<p>1 Q. What does GPA stand for?</p> <p>2 A. Grade point accumulation.</p> <p>3 Q. Are you familiar with how schools calculate</p> <p>4 grade point averages?</p> <p>5 A. I was more familiar at the time, but yes,</p> <p>6 each -- yes.</p> <p>7 Q. Are you familiar with how I-LEAD Charter</p> <p>8 School calculated GPA?</p> <p>9 A. Yes.</p> <p>10 Q. How do they do that?</p> <p>11 A. If memory serves me correctly, each letter</p> <p>12 grade corresponded to a one to four point scale, A being a</p> <p>13 four and on down.</p> <p>14 Q. So are you familiar with how other schools</p> <p>15 calculate GPA?</p> <p>16 A. I knew how the Citadel and Reading High</p> <p>17 did, and they used a weighted system, and I-LEAD Charter</p> <p>18 School did not use a weighted system.</p> <p>19 Q. So the manner in which the Reading schools</p> <p>20 calculated GPA was not the same as the manner in which the</p> <p>21 Charter School calculated GPA; correct?</p> <p>22 A. Correct. So I discounted the GPA's by an</p> <p>23 appropriate percentage based on those two different scales</p> <p>24 in order to compare.</p> <p>25 Q. Have you provided us within this Charter</p> <p style="text-align: right;">67</p>

<p>1 School Exhibit 4 report the manner in which you went about</p> <p>2 discounting the GPA?</p> <p>3 A. I did not.</p> <p>4 Q. Have you provided us with any work papers</p> <p>5 that you created to show the calculations that you used to</p> <p>6 discount a student's GPA?</p> <p>7 A. No. Again, this report was intended for</p> <p>8 public consumption, so I would say that the questions that</p> <p>9 you're asking with the more specifics there would be</p> <p>10 included in like a technical kind of report or technical</p> <p>11 notes.</p> <p>12 Q. But they're not included in Charter School</p> <p>13 Exhibit 4?</p> <p>14 A. Correct.</p> <p>15 Q. So in terms of the graph that's at the</p> <p>16 bottom of the page --</p> <p>17 A. Yes.</p> <p>18 Q. -- what is represented on the X axis?</p> <p>19 A. Number of students.</p> <p>20 Q. So 150 is the number of students?</p> <p>21 A. Is the number of retained learners in that</p> <p>22 school year, so those who entered in the fall of '12 and</p> <p>23 were with us in the spring or at the conclusion of the</p> <p>24 year.</p> <p>25 Q. And are you suggesting then that there were</p> <p style="text-align: right;">68</p>	<p>1 A. No. That would be a violation of privacy.</p> <p>2 Q. And do we know what grade levels each</p> <p>3 student was in?</p> <p>4 A. No. This would be all grade levels, so</p> <p>5 this would be all retained learners no matter of their</p> <p>6 grade level.</p> <p>7 Q. You had identified that other folks had</p> <p>8 prepared different sections of the Annual Report; correct?</p> <p>9 A. Of this document, which, again, is not a</p> <p>10 formal Annual Report, but yes.</p> <p>11 Q. I apologize. Thank you for clarifying that.</p> <p>12 In terms of who else prepared the report, can you identify</p> <p>13 who did?</p> <p>14 A. Dr. Yamil Sanchez and the Academic Dean at</p> <p>15 the time.</p> <p>16 Q. Who was who?</p> <p>17 A. Tamara -- Tammy Smith, Dr. Tamara Smith.</p> <p>18 Q. I'm not sure if the Charter School's Counsel</p> <p>19 addressed data on Page 19 that appears to be Acuity data.</p> <p>20 Would your testimony be similar about the information</p> <p>21 that's conveyed on that page, that you're not sure how many</p> <p>22 students are represented within those numbers?</p> <p>23 A. Correct.</p> <p>24 Q. You don't know which students are</p> <p>25 represented in those numbers?</p> <p style="text-align: right;">70</p>
<p>1 150 students retained by the Charter School in the '12/13</p> <p>2 school year?</p> <p>3 A. Yes. Again, had attendance with us from</p> <p>4 the fall through the spring.</p> <p>5 Q. You would agree with me that the Charter</p> <p>6 School enrolled many more than 150 students --</p> <p>7 A. Yes.</p> <p>8 Q. -- within the course of the '12/13 school</p> <p>9 year; correct?</p> <p>10 A. Yes.</p> <p>11 Q. How many students total did the Charter</p> <p>12 School enroll in the '12/13 school year?</p> <p>13 A. If memory serves me correctly, 400.</p> <p>14 Q. And we're only looking at 150 in this graph.</p> <p>15 Is that correct?</p> <p>16 A. Correct.</p> <p>17 Q. Is it a total of 150, or is it actually less</p> <p>18 than that?</p> <p>19 A. 148, I believe. For some reason I remember</p> <p>20 that.</p> <p>21 Q. And is it fair to say that, sitting here</p> <p>22 with just this graph in front of us, we don't know which</p> <p>23 students are reflected on the graph?</p> <p>24 A. By name?</p> <p>25 Q. Correct.</p> <p style="text-align: right;">69</p>	<p>1 A. Correct, not at this time.</p> <p>2 MS. PETERSEN: That's all I have.</p> <p>3 HEARING OFFICER: Mr. Stacey, redirect?</p> <p>4 BY MR. STACEY:</p> <p>5 Q. Ms. Clyde, do you recall whether the Reading</p> <p>6 School Board or the Reading Administration ever formally</p> <p>7 responded to this report?</p> <p>8 MS. PETERSEN: Objection. Beyond the</p> <p>9 scope of direct -- or scope of cross. Sorry.</p> <p>10 HEARING OFFICER: I'll let her answer.</p> <p>11 THE WITNESS: I have no recollection at</p> <p>12 all if they responded. I don't remember seeing any</p> <p>13 response.</p> <p>14 BY MR. STACEY:</p> <p>15 Q. Did you ever attend any meetings about this</p> <p>16 report with the School District Administration or the</p> <p>17 School Board?</p> <p>18 A. No.</p> <p>19 Q. Were you ever scrutinized by the</p> <p>20 Administration or the District about the data presented in</p> <p>21 the report?</p> <p>22 A. No.</p> <p>23 Q. Can you describe the efforts made by staff,</p> <p>24 if any, to have the Achieve 3000 and/or Acuity testing done</p> <p>25 by the students?</p> <p style="text-align: right;">71</p>

<p>1 A. Oh, yes. It was a full School effort, both 2 to ensure full attendance during testing days, as well as 3 completion. There were -- teachers participated, the 4 Reading Specialist participated, support staff 5 participated. 6 Everyone really had a hand in administering 7 -- not administering, I'm sorry -- in attempting to get all 8 students, as many as possible to participate and take the 9 test. 10 Q. You testified that a few students may not 11 have taken the Achieve 3000. Why would a student not have 12 taken the Achieve 3000? 13 A. Simply because they weren't in attendance 14 at the School that day and also were not in attendance on 15 subsequent make-up dates. 16 Q. So there were multiple dates on which a 17 student could take the Achieve 3000? 18 A. Yes. 19 Q. Once the student took the Achieve 3000 once, 20 were they done? 21 A. With Achieve, yes. Yes, again, to get a 22 baseline lexile reading level was the purpose. 23 Q. So the Charter School offered multiple days 24 on which students could take these assessments? 25 A. Yes.</p> <p style="text-align: right;">72</p>	<p>1 accordingly. We wanted to meet students where they were 2 academically and move them up and move them forward. 3 Presenting material to a student with a reading level of -- 4 at a 5th grade reading level and you present them material 5 at a 9th grade reading level, obviously, is not going to 6 result in comprehensional learning. 7 MR. STACEY: Nothing further. 8 HEARING OFFICER: Any questions based on 9 redirect? 10 BY MS. PETERSEN: 11 Q. Very short. Were you involved in creating 12 instruction for any students? 13 A. No. 14 Q. Were you involved in delivering instruction 15 for any student? 16 A. No. 17 MS. PETERSEN: That's all I have. 18 BY HEARING OFFICER: 19 Q. Ma'am, just so I'm clear, there were some 20 questions about when you had the responsibility to enter 21 data. I don't want to put words in your mouth, could you 22 give me a date when you started any student data that was 23 reflected in the big binders, Charter School 10, and when 24 you would have stopped? 25 A. The transcript entry began for me in the --</p> <p style="text-align: right;">74</p>
<p>1 Q. And that was as part of an effort to get as 2 many students to take these tests as possible? 3 A. Yes, absolutely. We wanted as full a 4 profile as we could of our student body and the reading 5 levels represented. 6 Q. As Data Analyst, were you satisfied with the 7 number of students that took these assessments? 8 MS. PETERSEN: Objection. Relevancy. 9 HEARING OFFICER: Can you rephrase the 10 question? 11 MR. STACEY: Sure. 12 BY MR. STACEY: 13 Q. Do you believe that the charts provided for 14 Achieve 3000 on Page 5 show -- strike that. To what extent 15 do you think the Achieve 3000 graph on Page 5 gives an 16 accurate reflection of the student body at I-LEAD Charter 17 School during that time? 18 A. I'm virtually a hundred percent sure 19 because we also did -- if students did not have an Achieve 20 score in the system, they were pulled from class or had a 21 particular Reading Specialist appointment to take this 22 assessment so that we would have a reading score for them 23 and, therefore, could design instruction accordingly. 24 Q. Why was that important? 25 A. So that we could design instruction</p> <p style="text-align: right;">73</p>	<p>1 in the spring of 2012. The Acuity and Achieve assessments 2 had been administered from the inception of the School, so 3 I was not virtually involved in that administration or the 4 entering of that data. Again, the data sets are locked, 5 and they're downloaded from these online sources. 6 Q. So the transcript data entry would have 7 begun, you said, in the spring of 2012? 8 A. Yes. 9 Q. And until when? 10 A. Through my departure in the spring of 2014. 11 HEARING OFFICER: Thank you. Did my 12 question trigger any questions from either of you? 13 MR. STACEY: Yeah, I think I just want to 14 clarify something that I believe on cross-examination Ms. 15 Clyde said that she began reviewing transcripts in the 16 spring of 2013. I think she just testified again that 17 she began in the spring of 2012. 18 HEARING OFFICER: That's why I'm asking. 19 I just want to make sure I have my notes clear. 20 THE WITNESS: Forgive me, my mistake. It 21 was 2012. I entered longer than two months if it was 22 just 2013, so yeah. 23 MS. PETERSEN: Can I just ask one more 24 clarifying question then? 25 HEARING OFFICER: Sure.</p> <p style="text-align: right;">75</p>

<p>1 BY MS. PETERSEN:</p> <p>2 Q. So then after you ceased that function,</p> <p>3 which would have been in the spring of 2014, you would not</p> <p>4 have entered transcript information for any student</p> <p>5 thereafter, correct?</p> <p>6 A. No. Correct.</p> <p>7 Q. So if a student enrolled in the '14/15</p> <p>8 school year in the Charter School, you would not have been</p> <p>9 responsible for that?</p> <p>10 A. Correct, I would not.</p> <p>11 HEARING OFFICER: Either one of you any</p> <p>12 questions? Is there any reason why this witness</p> <p>13 shouldn't be excused at this time? No? Okay. Then,</p> <p>14 ma'am, you're excused.</p> <p>15 (Short recess was taken.)</p> <p>16 HEARING OFFICER: It's 11:30 a.m. We're</p> <p>17 back on the record. Prior to reconvening the hearing,</p> <p>18 with the agreement of Counsel we'll proceed with this</p> <p>19 witness until approximately 12:30, and then we'll take a</p> <p>20 lunch break for one hour.</p> <p>21 MS. PETERSEN: That's fine.</p> <p>22 HEARING OFFICER: Mr. Stacey, you can</p> <p>23 call your next witness.</p> <p>24 MR. STACEY: Charter School calls David</p> <p>25 Castro.</p> <p style="text-align: right;">76</p>	<p>1 inception of the corporation through, I believe, until</p> <p>2 August of 2014.</p> <p>3 Q. Who succeeded you?</p> <p>4 A. Robert Natalini, N-A-T-A-L-I-N-I.</p> <p>5 Q. Other than the Board Chair, did you have any</p> <p>6 other officership?</p> <p>7 A. No.</p> <p>8 Q. You said you were pro bono Counsel. Are you</p> <p>9 a licensed attorney in Pennsylvania?</p> <p>10 A. Yes, I am.</p> <p>11 Q. What is your background as an attorney?</p> <p>12 A. I went to the University of Pennsylvania</p> <p>13 Law School, graduated in 1986. I practiced law at the</p> <p>14 Pepper firm from '86 to about '91, and then I was an</p> <p>15 Assistant District Attorney in Philadelphia, was a Chief in</p> <p>16 the D.A.'s office, left the D.A.'s office in about 1994.</p> <p>17 And I have not actively practiced law since</p> <p>18 then, but I have maintained my license to practice active.</p> <p>19 Q. What have you done since then?</p> <p>20 A. I have, for the past 20 years, served as</p> <p>21 the Executive Director, President and CEO of I-LEAD, Inc.</p> <p>22 Q. From a corporate perspective, what is</p> <p>23 I-LEAD, Inc.?</p> <p>24 A. So I-LEAD stands for the Institute for</p> <p>25 Leadership Education Advancement and Development. It's a</p> <p style="text-align: right;">78</p>
<p>1 DAVID CASTRO, ESQUIRE,</p> <p>2 was called as a witness and, having been first duly sworn</p> <p>3 by the Reporter-Notary Public, was examined and testified</p> <p>4 as follows:</p> <p>5 BY MR. STACEY:</p> <p>6 Q. Mr. Castro, can you state your and spell</p> <p>7 your name for the record, please?</p> <p>8 A. David Castro, D-A-V-I-D, C-A-S-T-R-O.</p> <p>9 Q. Thank you. David, what is your position at</p> <p>10 I-LEAD Charter School?</p> <p>11 A. Right now, I am only serving as pro bono</p> <p>12 Counsel to the School.</p> <p>13 Q. When you say to the School, to the School</p> <p>14 Board?</p> <p>15 A. Correct. Right.</p> <p>16 Q. What positions have you held at I-LEAD</p> <p>17 Charter School?</p> <p>18 A. I have served as a member of the Board and</p> <p>19 as a Chair of the Board.</p> <p>20 Q. How long were you a Board member?</p> <p>21 A. I was a Board member from the inception of</p> <p>22 the corporation through, I believe, until June of 2015.</p> <p>23 Q. At any time did you have an officership on</p> <p>24 the Board?</p> <p>25 A. Yes. I was the Chair of the Board from the</p> <p style="text-align: right;">77</p>	<p>1 public charity, 501c3 corporation formed in 1995 and has</p> <p>2 been in existence continuously since then.</p> <p>3 Q. What is your -- you may have stated this,</p> <p>4 but what is your position at I-LEAD, Inc.?</p> <p>5 A. Yeah, I'm the Executive Director, President</p> <p>6 and CEO of I-LEAD, Inc.</p> <p>7 Q. What is I-LEAD, Inc.'s corporate mission?</p> <p>8 A. I-LEAD's mission is to improve quality of</p> <p>9 life in challenged communities through leadership</p> <p>10 development and education. And we do grass roots community</p> <p>11 leadership development. We do training and consultancy for</p> <p>12 non-profit organizations, and we also have done workforce</p> <p>13 development programs. We have a significant program that</p> <p>14 operates to deliver higher education, college education in</p> <p>15 low income neighborhoods throughout southeastern</p> <p>16 Pennsylvania.</p> <p>17 Q. Can you talk about some of your main</p> <p>18 programs at I-LEAD, Inc.?</p> <p>19 A. Sure. Well, the program that has the</p> <p>20 largest scope right now is what we call our ACE program,</p> <p>21 Achieve College Education. What we do is we are in a joint</p> <p>22 agreement with Harcum College, and we help Harcum to form</p> <p>23 cohorts of learners in low income neighborhoods through</p> <p>24 community-based partnerships.</p> <p>25 And we started that program in 2005 with a</p> <p style="text-align: right;">79</p>

<p>1 small cohort and have built up the program, and now we have 2 over 600 learners in that program, achieving college 3 education in their neighborhoods with about 500 graduates 4 from that program.</p> <p>5 And then we do a lot of other things. We 6 do workforce development programs. We do programs that are 7 funded by foundations. We do consultancy. We do work with 8 foundations and non-profit organizations, and we are often 9 hired to do leadership development programming on a 10 specialized basis.</p> <p>11 Q. With these foundations, do you engage in 12 fundraising and development?</p> <p>13 A. Yes, we do. Yes.</p> <p>14 Q. What's the approximate budget of I-LEAD, 15 Inc., annually?</p> <p>16 A. Today I-LEAD has a budget of about three 17 and a half million dollars a year, and that's generated 18 from our program partnerships in higher education program, 19 foundation grants, and some individual gifts and 20 consultancy that we do, earned revenue that we generate by 21 providing services to non-profit organizations.</p> <p>22 Q. Has Inc. ever been recognized for any of 23 these programs that you're describing, recognized I mean 24 awards --</p> <p>25 A. Yes.</p> <p style="text-align: right;">80</p>	<p>1 to think about forming a founding coalition to develop a 2 Charter School in Reading.</p> <p>3 And that's when the work really began. And 4 it was pretty intensive work throughout the year 2009 5 leading up to an application that, I believe, was delivered 6 to the School Board in November of 2009.</p> <p>7 Q. Let's back up a second.</p> <p>8 A. Wait, am I off on my dates?</p> <p>9 Q. You said you were approached by community 10 members?</p> <p>11 A. That is correct.</p> <p>12 Q. Are we talking about Reading, Pennsylvania, 13 community members?</p> <p>14 A. Yes, absolutely.</p> <p>15 Q. So was there a decision by I-LEAD, Inc., to 16 locate or to seek out a Charter in Reading specifically?</p> <p>17 A. So I-LEAD had done work in Reading for a 18 period of almost a decade. We had done leadership 19 development work at the grass roots level. We had also 20 done a number of workforce development programs.</p> <p>21 We had an office in Reading. And so we had 22 a Team and a staff that had extremely high contact with 23 community residents in Reading, and we were operating one 24 of our college program cohorts in Reading. And so it was 25 through those community contacts that we originally</p> <p style="text-align: right;">82</p>
<p>1 Q. -- things like that?</p> <p>2 A. Yes. We have been awarded some very 3 prominent fellowships, the Eisenhower Program and the 4 Ashoka, A-S-H-O-K-A, Program. That's a worldwide 5 organization of social entrepreneurs.</p> <p>6 And we have received major grants from the 7 Knight Foundation. We have twice been selected in a 8 competitive funding basis for support from the United Way 9 of Southeastern Pennsylvania.</p> <p>10 And we -- the Charter School was actually 11 awarded by the Community First Fund this past November as 12 the community development organization of the year.</p> <p>13 Q. With respect to that last comment, you said 14 the Charter School was awarded?</p> <p>15 A. Yes. And we view the Charter School as 16 part of our philanthropic mission, so when the Charter 17 School gets an award, we feel that we earned it, too.</p> <p>18 Q. Speaking of that, did I-LEAD, Inc., induce 19 the creation of an application for a Charter School?</p> <p>20 A. Yes.</p> <p>21 Q. When did that happen?</p> <p>22 A. The work for the development of the Charter 23 School began in 2009. It was -- and possibly as early as 24 2008. We were approached by members of the community and 25 people who had knowledge of Charter Schools and encouraged</p> <p style="text-align: right;">81</p>	<p>1 developed the concept of the Charter School.</p> <p>2 Q. Before we get to that, can I ask what is 3 leadership development and what is workforce development?</p> <p>4 A. So leadership development is when we work 5 with low income residents or with emergent community 6 leaders to develop their leadership skills by providing 7 training in leadership development that could include a lot 8 of work on their communication skills, their personal and 9 Team effectiveness, their ability to engage in management 10 and leadership activities at the community level and in 11 their organizations.</p> <p>12 Workforce development programs are where we 13 would get funded by a foundation or by a government agency 14 to work with citizens to enhance specific skills related to 15 getting a job or to moving up in the local labor economy. 16 And we have done a lot of work in both of those arenas.</p> <p>17 Q. So the Reading community members approach 18 you, and prior to filing the application, what happens? 19 Can you just provide a little more detail?</p> <p>20 A. Sure. It's a tremendous amount of work, 21 essentially hours and hours of meetings and planning that 22 was conducted with parents, students, community leaders 23 teachers, Board members, actually, of the then Reading 24 School Board that we interacted with, local officials, 25 basically consulting and meeting and understanding whether</p> <p style="text-align: right;">83</p>

1 there would be a role for a School like the one we were
2 proposing, how it would be -- how it would be framed and
3 actually then a process, an intensive community process
4 that led up to the development of the application, which
5 was then submitted to the School Board.

6 Q. Can you briefly describe the original
7 application, mission of the School as originally proposed?

8 A. Sure. So we had a very specific vision
9 originally that we were working on. We thought there was
10 room for a two-year school. Our original vision for the
11 School was to create a school that would serve the 11th and
12 12th grade, focused primarily on students that had dropped
13 out because they were no longer legally required to be in
14 school.

15 As you I'm sure know, that when someone
16 turns 17, they no longer legally have to go to school, and
17 at that point they're not considered truant. It was our
18 understanding, looking at the data that the District had
19 available publicly, that there was a significant problem
20 with students exiting the District when they turned 17.

21 And we believed at the time that there were
22 a number of students, a significant number of students that
23 had earned significant credits in the 9th and 10th grade,
24 but they were then dropping out, and that we would be able
25 to serve them in the 11th and 12th grade, and this fit very

84

1 well with our mission to try to help low income learners to
2 go to college.

3 So many of the population that we deal with
4 are people that never went to college after they graduated
5 from high school.

6 Q. Can I can stop you right there?

7 A. Sure.

8 Q. And can I just ask, when you say we and
9 us --

10 A. I-LEAD.

11 Q. -- instead of saying we and us, can you use
12 Inc. or the Charter School?

13 A. Sure. So, remember, during this time frame
14 the Charter School doesn't exist. So it's I-LEAD, Inc., as
15 a non-profit organization, thinking and doing this work
16 engaging essentially as the leading non-profit organization
17 of the founding coalition.

18 So that was how we framed ourselves
19 initially. I mean, we were in this community. We were
20 doing philanthropic work, and we wanted to lead a group of
21 people in framing a new institution which would become
22 I-LEAD Charter School. And so that's what I mean when I
23 say we.

24 It was not just our employees, but it was a
25 coalition of people from the community, including students,

85

1 parents, other local non-profit organizations like the
2 NAACP, and we actually had contact with numerous
3 organizations in the community as we were forming the
4 vision for the School.

5 Q. You mentioned the ACE program.

6 A. Yeah. The ACE program is a program that's
7 run at I-LEAD, Inc., which is -- the mission of that
8 program is to help low income learners in disadvantaged
9 neighborhoods achieve college education. ACE stands for
10 Achieve College Education.

11 Q. During the time of the application, was the
12 ACE program active in the Reading area?

13 A. Yes, it was.

14 Q. Were there any specific affiliations with
15 specific institutions?

16 A. Well, we had -- we were engaged with our
17 main academic partner, which was and is today Harcum
18 College, but we were also working collaboratively with
19 almost every organization that we could find in the City of
20 Reading to try to promote the development of that program.

21 Q. In the original application was the proposed
22 School named the I-LEAD Charter School?

23 A. I don't believe so. I think in our
24 original application we may have called it the Reading
25 Leadership Institute.

86

1 Q. Do you recall who the Superintendent of the
2 Reading School District was when the original Charter was
3 submitted?

4 A. I must confess, I cannot remember his name
5 sitting here right now. I cannot remember his name. I do
6 know it, but I don't remember it right at this moment. I
7 know that we did -- we did reach out and speak with him
8 directly during the -- during this formative stage. We
9 engaged in direct dialog not only with him, but with many
10 of the Board members.

11 Q. Do you remember the date the original
12 Charter application was filed?

13 A. My recollection is that it is in the first
14 two weeks of November of 2009.

15 Q. So you filed the original application?

16 A. Correct.

17 Q. What happens next?

18 A. I believe that there was then a hearing on
19 the application in February of 2010. And then there was an
20 initial decision by the Board to decline that application,
21 which I believe took place in March, that's my
22 recollection, of 2010.

23 Q. What form did that declination take?

24 A. I believe there was a vote of the School
25 Board. They voted on the application, and it did not have

87

1 enough votes to pass.
2 Q. Did they issue a formal written
3 adjudication?
4 A. I cannot recall. I do remember that we
5 attended the deliberation meeting, we attended the vote
6 meeting, we spoke actively with all of the Board members
7 that participated in that vote, so we had -- we didn't
8 know, I believe -- very well understand what their concerns
9 were, and we didn't agree with all their concerns, but we
10 were not -- but I don't recall that there was a formal --
11 sitting here today, I don't recall that there was a formal
12 statement of reasons as to why they declined the
13 application, but I could be wrong about that. I just don't
14 remember.
15 Q. What were the concerns of the Board about
16 the application?
17 A. There were two primary concerns that were
18 expressed to us. One was the cost of the School. That was
19 constant thematic. Our understanding was that they were
20 worried about how much the School would cost.
21 And then the second thing was that they
22 were very concerned that we would draw or drain students
23 away from the 11th and 12th grade of the Reading High
24 School. And they didn't want us to compete with their
25 enrollment at the 11th and 12th grade level.

88

1 Q. So they had these concerns, they vote to
2 deny the application, then what happens?
3 A. So then we began an intensive process of
4 meeting and speaking with them and, again, meeting and
5 speaking with other members of the community, and we
6 ultimately decided that rather than appeal their decision,
7 we wanted to try to reframe the application, revise the
8 application because we believed that there was a way that
9 we could design a school that would satisfy their concerns.
10 Q. Can I have you turn to the -- is it a
11 white -- do they have the joint exhibits up there?
12 A. Binder 1 of 2?
13 Q. No, this is joint.
14 A. Oh, joint? Okay.
15 Q. Could I have you turn to Tab 5, please?
16 A. Tab 5.
17 (Witness complies.)
18 Yep.
19 Q. You were just referring to a revision
20 process.
21 A. Right.
22 Q. Was this the result of that revision
23 process?
24 A. Yes, it is.
25 Q. Could you just generally describe Joint

89

1 Exhibit 5?
2 A. So this is our application and a cover
3 letter describing our vision for the School and setting
4 forth all of the information required, you know, in the
5 application guidelines, which was voluminous.
6 And I think it describes our -- it
7 describes our vision for how we would resolve the concerns
8 that they had raised.
9 Q. Do you recall any substantive changes
10 between the original application and these changes --
11 A. Yes.
12 Q. -- or applications?
13 A. So we wanted to try to really explain that
14 it was our intention to focus on the most disadvantaged
15 students in the community, and that we did not see
16 ourselves attempting to recruit students who were
17 successful and interested in attending the 11th and 12th
18 grade at Reading High School, but rather that we would
19 focus on students that were beyond the legal age where they
20 were required to attend school and that -- but, in general,
21 that we would focus still on running a two-year School, the
22 11th and 12th grade.
23 Q. Page 1 and 2, this is the cover letter?
24 A. Yes.
25 Q. And this was written by you?

90

1 A. Yes.
2 Q. Can you describe what was happening in this
3 cover letter?
4 A. Well, as I just said, we were really trying
5 to state our intention and our desire not to recruit the
6 successful students that were planning to proceed and do
7 their 11th and 12th grade in Reading, but rather to focus
8 on those students that were disconnected from school that
9 were beyond the age where they legally had to -- where they
10 legally were required to attend school, and that our
11 mission would be to focus on the dropout problem.
12 We had done a lot of research, and we were
13 convinced that there was a significant -- that Reading did
14 have a significant historical dropout problem, and that we
15 could build a school that would reengage those students.
16 And it was our interest to bring them back into the 11th
17 and 12th grade so that they could then complete high school
18 and graduate and go to college.
19 And, of course, the other elements of the
20 application remained largely the same. We believed then,
21 as we do today, that addressing the motivational elements
22 of education, working on leadership development and
23 building a strong school culture could lead to an overall
24 improvement in their academic trajectory, that it would
25 make them more successful, and that it would allow them to

91

<p>1 persist and to go through to college.</p> <p>2 Q. Back on Page 1, what is the date of this</p> <p>3 cover letter?</p> <p>4 A. June 4th, 2010.</p> <p>5 Q. Is that the day that this revised</p> <p>6 application was filed?</p> <p>7 A. I believe so. Yes.</p> <p>8 Q. Was there another set of hearings -- let me</p> <p>9 ask you this. What happened after you filed this?</p> <p>10 A. So after we filed this, there were</p> <p>11 additional hearings. There were ongoing conversations. We</p> <p>12 had -- we had virtually ongoing conversations with members</p> <p>13 of the Board, some of which were just us talking with</p> <p>14 members of the Board, and some of them were actually in</p> <p>15 hearings, in the formal hearings.</p> <p>16 And we were understanding, you know, what</p> <p>17 their reaction was to this. They did have, I believe, a</p> <p>18 formal hearing in August. I'm not recalling right now the</p> <p>19 exact date of that, but we did have a formal hearing in</p> <p>20 August where they deliberated on the public record,</p> <p>21 expressed some of the concerns that they were expressing to</p> <p>22 us privately.</p> <p>23 And then they proceeded to vote much later,</p> <p>24 actually, I believe in October. They had more</p> <p>25 deliberations and then a meeting at which they voted.</p> <p style="text-align: right;">92</p>	<p>1 missed the boat here, in essence. And that continued to</p> <p>2 be what was expressed to us, and it was echoed in their</p> <p>3 public deliberations as well.</p> <p>4 BY MR. STACEY:</p> <p>5 Q. I believe you said at the end of October the</p> <p>6 Board voted?</p> <p>7 A. Yes.</p> <p>8 Q. Can you turn to Joint Exhibit 6, please?</p> <p>9 A. (Witness complies.)</p> <p>10 Q. Within that, can you turn to Page 2?</p> <p>11 A. (Witness complies.)</p> <p>12 Yes.</p> <p>13 Q. Do you see the GEN-55?</p> <p>14 A. Yes.</p> <p>15 Q. Do you recognize this document?</p> <p>16 A. Yes, I do.</p> <p>17 Q. Do you know what it is?</p> <p>18 A. Yes. I believe it's a faithful and</p> <p>19 accurate representation of the Resolution that they made</p> <p>20 when they decided to award the Charter, and that would have</p> <p>21 been, I guess, on October 27th.</p> <p>22 Q. Can you read Paragraph 10 of that</p> <p>23 Resolution?</p> <p>24 A. Paragraph 10 says: I-LEAD student body</p> <p>25 will reflect Grades 9 through 12.</p> <p style="text-align: right;">94</p>
<p>1 Q. What were the concerns raised by the Board</p> <p>2 during these deliberations?</p> <p>3 A. So the primary concerns that were raised to</p> <p>4 us after the June 10th letter was that they were very</p> <p>5 concerned that there were many younger students that needed</p> <p>6 support; that they didn't -- we thought we could solve the</p> <p>7 problem by restricting our operation to students who were</p> <p>8 beyond the legal age to attend.</p> <p>9 MS. PETERSEN: I apologize for</p> <p>10 interrupting. I'm going to object based on hearsay.</p> <p>11 He's testifying about what others told him.</p> <p>12 HEARING OFFICER: I'm going to allow it.</p> <p>13 Again, I want to try to get the bigger picture here, so</p> <p>14 I'll allow Mr. Castro to continue.</p> <p>15 MS. PETERSEN: I just want to note my</p> <p>16 objection for the record.</p> <p>17 HEARING OFFICER: It's noted.</p> <p>18 THE WITNESS: So, essentially, we were</p> <p>19 told that they believed that the dropout problem was</p> <p>20 manifesting much earlier, that it was manifesting as</p> <p>21 early as the 9th and 10th grade, and that they weren't</p> <p>22 excited about our vision of focusing on students that</p> <p>23 were beyond the legal attendance age.</p> <p>24 And they pushed back pretty hard on that</p> <p>25 and asked us to start to think about whether we had</p> <p style="text-align: right;">93</p>	<p>1 Q. When you were talking about the Board</p> <p>2 deliberations and their concerns, are those the</p> <p>3 circumstances that led to that paragraph being added?</p> <p>4 A. Yes. And I have to say that we walked out</p> <p>5 of that meeting very surprised. We were -- we felt that</p> <p>6 they had granted the Charter in such a way that was a</p> <p>7 significant modification to our -- the design of our</p> <p>8 School.</p> <p>9 And we immediately began to meet and talk</p> <p>10 about how we could build an institution that was the one</p> <p>11 that they had awarded the Charter, which was not the one</p> <p>12 that we had presented in our application.</p> <p>13 Q. Can you flip back to Tab 5, the revised</p> <p>14 application?</p> <p>15 A. Yep.</p> <p>16 (Witness complies.)</p> <p>17 Q. So based on your testimony here today and</p> <p>18 your understanding of the revised application, is the</p> <p>19 education of students in Grades 9 through 10 mentioned</p> <p>20 anywhere in this revised application?</p> <p>21 A. No.</p> <p>22 Q. Is there any curriculum provided for Grades</p> <p>23 9 and 10?</p> <p>24 A. No.</p> <p>25 Q. Does that include the appendices?</p> <p style="text-align: right;">95</p>

1 A. Yes.

2 Q. So the Board approved the Charter, your

3 reaction is surprise. Did you have any additional concerns

4 about having to do that?

5 A. Yes. I felt that we -- I felt that -- I

6 was excited and we were all excited that they had decided

7 to approve the Charter, but we felt that the application

8 itself was no longer a description of the institution. We

9 had not presented any curriculum for Grades 9 and 10. We

10 had not presented any academic goals for Grades 9 and 10.

11 And, most importantly, we had envisioned a population that

12 would be primarily made up of students that had credits

13 through Grades 9 and 10, and they, in awarding the Charter,

14 expanded the scope of our student body to accept not only

15 those students, but students who may have had no credits at

16 all from Grade 9 and 10.

17 So they actually completely changed the

18 composition of the School. And I felt that -- I think our

19 entire Team felt that the application could no longer be

20 used as a meaningful statement of what the Charter

21 consisted of.

22 Q. Let's talk about that. Can you turn to Page

23 -- it's Page 4 of the narrative, so not including the cover

24 letter. It has No. 4 on the bottom?

25 A. Yes.

96

1 Q. It says Measurable Goals and Objectives at

2 the bottom.

3 A. Yes.

4 Q. Are what we see on Pages 4, 5, 6, 7 to the

5 top of 8 Academic Goals --

6 A. Yes.

7 Q. -- under the heading of I.2.A, Academic

8 Goals?

9 A. Yes.

10 Q. Can you read Academic Goal No. 1?

11 A. Academic Goal No. 1, By the end of the

12 schools fifth year of operation, 75 percent of exiting 12th

13 grade learners --

14 Q. I think that's an objective. Can you read

15 the first goal?

16 A. Oh, okay. Let's see, Objective, Academic

17 Goal -- I'm sorry.

18 Q. It's above the bullet point that you just

19 began reading. It's right under Academic Goal No. 1.

20 A. Oh, RLICS learners?

21 Q. Yes.

22 A. RLICS learners will develop competency in

23 the content areas of literacy and mathematics.

24 Q. What is RLICS refer to?

25 A. Reading Leadership Institute Charter

97

1 School.

2 Q. So in the revised application there had not

3 been a name change yet?

4 A. No.

5 Q. How was that goal to be measured?

6 A. By the end of the schools fifth year of

7 operation, we said that 75 percent of exiting 12th graders

8 would score as proficient or advanced on representative

9 internally administered sections of the Reading

10 comprehension and writing components of the PSSA or will

11 have increased their literacy skills by at least four

12 functioning levels as measured by the Test of Adult Basic

13 Education, and then it goes on from there.

14 Q. So you're to measure this by the end of the

15 Schools fifth year of operation?

16 A. Correct.

17 Q. You began operation in what school year?

18 A. 2011/12.

19 Q. What would be the fifth year of operation?

20 A. I believe it would be the year that we're

21 entering -- that we're in now. Yes, it would be the year

22 we're in now.

23 Q. The 2015/16 school year?

24 A. Correct.

25 Q. We have not finished that school year. Is

98

1 that correct?

2 A. Correct.

3 Q. Looking at the remainder of the academic

4 goals, is that how all of the academic goals are

5 structured?

6 A. Yes. They're targeted at 12th graders

7 after the fifth year of operations.

8 Q. To the extent you know, is student

9 performance at I-LEAD approaching 75 percent of exiting

10 12th graders scoring proficient or advanced on a

11 standardized test?

12 A. It has improved. I don't believe that it's

13 gotten to that level, but I don't have the specific numbers

14 right in front of me. But I don't believe it is there yet,

15 no.

16 Q. Can you refer to Joint Exhibit 1?

17 A. Yes.

18 Q. Is this the Request for Amendment that you

19 filed?

20 A. Yes.

21 Q. Or I-LEAD Charter School filed?

22 A. Yes.

23 Q. Turn to Page 3.

24 A. (Witness complies.)

25 Page 3, okay. I'm on Page 3. Yes.

99

<p>1 Q. Can you read Paragraph 11, please?</p> <p>2 A. RSD declined to include specific academic</p> <p>3 goals in the 2011 Charter Agreement and declined to address</p> <p>4 I-LEAD's academic performance during the renewal process.</p> <p>5 Q. And can you read Paragraph 13?</p> <p>6 A. The Charter School recognizes that it is</p> <p>7 important for the Charter to contain measurable academic</p> <p>8 goals. However, any academic goals in the Charter -- in</p> <p>9 this Charter School's Charter must reflect two facts: (a),</p> <p>10 the state's shift to the Pennsylvania Core Standards has</p> <p>11 resulted in a resetting of baseline academic data; and (b),</p> <p>12 the Charter School's focus on a discrete at-risk population</p> <p>13 often involves the Charter School educating students who</p> <p>14 have a significant discrepancy between potential and actual</p> <p>15 achievement, suffer from a spectrum of social, behavioral</p> <p>16 or psychological conditions or factors that may impede</p> <p>17 their academic attainment and who enter the Charter School</p> <p>18 several grade levels behind their same-aged peers. And</p> <p>19 then it references one of our reports.</p> <p>20 Q. So going back to the academic goals in Joint</p> <p>21 Exhibit 5 -- I'm sorry, I should have had you hold that</p> <p>22 spot.</p> <p>23 A. That's okay.</p> <p>24 Q. -- was it your understanding after the</p> <p>25 granting of the Charter, that these goals would apply to</p> <p style="text-align: right;">100</p>	<p>1 should look at our performance on students who are in the</p> <p>2 School for a period of time, and it should take into</p> <p>3 account where they are when they enter the School.</p> <p>4 Because, otherwise, we would be evaluated</p> <p>5 really on the basis of something that we can't control,</p> <p>6 which is who happens to come in and enroll. We don't</p> <p>7 really have any control over our enrollment process. If we</p> <p>8 have a spot, we have to admit somebody if they turn up and</p> <p>9 they meet the requirements that are spelled out in the</p> <p>10 Charter.</p> <p>11 So all we can do, and we do do this, is try</p> <p>12 to recruit the lowest performing, most disconnected</p> <p>13 students that we can find. And, of course, you can imagine</p> <p>14 if you're running a school like that, you need to really</p> <p>15 think carefully about what a reasonable measure of academic</p> <p>16 performance looks like.</p> <p>17 Q. In the small binder, 1 of 2, to your left.</p> <p>18 It's a different binder.</p> <p>19 A. Yes.</p> <p>20 Q. Can you turn to Tab 4?</p> <p>21 MR. CIANCI: Can we state specifically,</p> <p>22 is that the Charter School binder?</p> <p>23 MR. STACEY: Yes, this is the I-LEAD</p> <p>24 Charter School binder, 1 of 2.</p> <p>25 THE WITNESS: Okay. Yes.</p> <p style="text-align: right;">102</p>
<p>1 9th and 10th graders?</p> <p>2 A. No.</p> <p>3 Q. Was it your understanding at the time the</p> <p>4 Charter was granted, that the Charter School would be</p> <p>5 judged on the academic performance of 9th and 10th graders?</p> <p>6 A. No.</p> <p>7 Q. Is this one of the reasons that the Charter</p> <p>8 School is seeking an amendment to the academic goals</p> <p>9 contained in its Charter?</p> <p>10 A. Yes.</p> <p>11 Q. Can you elaborate on that a little bit?</p> <p>12 A. Yes. I mean, we believed and we hoped that</p> <p>13 we would have a robust partnership with the District in</p> <p>14 framing academic goals that were consistent with the</p> <p>15 redesign of the institution in the award of the Charter.</p> <p>16 Unfortunately, that never happened.</p> <p>17 We did try to be extremely transparent in</p> <p>18 terms of what we were doing from a curricular focus. And</p> <p>19 the challenges that we were experiencing serving this</p> <p>20 substantially broadened population, but we really didn't</p> <p>21 get much uptake in terms of a collaborative dialogue.</p> <p>22 And so it's in that spirit -- we have, by</p> <p>23 the way, on several occasions met with the District to try</p> <p>24 to say we think this is a rational academic standard. And</p> <p>25 we think that for an academic standard to be meaningful, it</p> <p style="text-align: right;">101</p>	<p>1 BY MR. STACEY:</p> <p>2 Q. Tab 1, please.</p> <p>3 A. Tab 1. Okay, Tab 1. Yes.</p> <p>4 Q. Are you familiar with this document?</p> <p>5 A. Yes, I am.</p> <p>6 Q. Are you the author of this document?</p> <p>7 A. Yes, I am.</p> <p>8 Q. Can you tell me what it is?</p> <p>9 A. When we formed the Charter with the School</p> <p>10 District, we were very clear that it didn't make sense to</p> <p>11 incorporate all the provisions of our application. So we</p> <p>12 went about creating a selection of those -- a document that</p> <p>13 would be drawn from the application that would be the</p> <p>14 things that we would agree would become part of the</p> <p>15 Charter, given, essentially, the redesign of the School by</p> <p>16 the School Board.</p> <p>17 And this document reflects our statement of</p> <p>18 what we thought that was. And that document was the</p> <p>19 attachment to the Charter Agreement that was signed by the</p> <p>20 parties.</p> <p>21 Q. What is the content of this?</p> <p>22 A. So it really sets forth our vision for the</p> <p>23 School as it was modified by the redesign of the School by</p> <p>24 the School Board when they awarded the Charter. And so it</p> <p>25 sets forth a statement of our desire to serve, you know, at</p> <p style="text-align: right;">103</p>

1 risk youth to -- and then, of course, our interest in
2 leadership development and our interest in creating a
3 School culture that would be around the development of the
4 whole person and not just looking at their academic
5 performance, but looking at who they are as human beings.
6 And we attempted to incorporate that, along
7 with what we perceived to be the things that were integral
8 to the character of the School that we were trying to
9 build.

10 Q. What does it say next to Goals?
11 A. It says that we will enable at-risk youth
12 and high school dropouts to transition seamlessly into
13 adulthood, prepared to be productively engaged citizens in
14 the 21st century economy as community leaders and
15 entrepreneurs through an educational model that integrates
16 life skills and academic skills.

17 Q. Now, is that really a measurable goal?
18 A. It is -- I think it's measurable.
19 Q. In what way?
20 A. I think it's measurable in looking at, you
21 know, grades and looking at graduation rates, and looking
22 at transition to college. And I think, obviously, there
23 would be -- and we did go about intensively assessing
24 students and using those assessments to increase their math
25 and literacy skills as we had envisioned doing in all of

104

1 our applications.
2 Q. You said envisioned doing in our
3 applications. When you say that, can you turn back to
4 Page 4 of Joint Exhibit 5?
5 A. Yes.
6 (Witness complies.)
7 So we said that learners will develop
8 competency in content areas of literacy and mathematics.
9 Now, you know, again, our -- the reason for our seeking an
10 amendment is to make an explicit -- a more explicit and
11 more measurable academic standard that we feel is a
12 rational judgment of the performance of the School.

13 Q. So in that first objective that you read
14 into the record, the last clause in that says, or will --
15 or, the students, will have increased their literacy skills
16 by at least four functioning levels as measured by the Test
17 of Adult Basic Education. Do you see that?
18 A. Yes.
19 MS. PETERSEN: I'm sorry, where are you
20 reading?
21 MR. STACEY: I'm sorry. I apologize.
22 I'm on Page 4 of Joint Exhibit 5.
23 MS. PETERSEN: Thank you.
24 BY MR. STACEY:
25 Q. So that way to measure that goal that you

105

1 wrote for the application is not based on achievement of a
2 standardized test score?
3 A. No.
4 Q. Why would there be an alternate way to
5 measure when you originally devised this application?
6 A. Because, again, we knew we were focusing on
7 a population that is very low performing academically. We
8 knew that we were trying to reach out to students that were
9 disconnected from School and that, perhaps, had been out of
10 School for awhile, and we expected them to be presenting
11 with severe academic deficits.

12 Q. Did that happen?
13 A. Did we get students like that?
14 Q. Yes.
15 A. Yes, we certainly did. We got -- and even
16 more challenges than we could have imagined when we were in
17 the application phase.

18 Q. Can you explain that a little bit?
19 A. Sure. I mean, the students present not
20 only with severe academic deficits, but with extraordinary
21 social problems, including pregnancy, addiction,
22 adjudication, homelessness, and the list goes on.
23 These students are not merely suffering
24 academically; they are suffering in all aspects of their
25 lives. And educating them is not just a matter of

106

1 addressing what's going on intellectually, but it's also
2 critically important the culture and surrounding that we
3 provide them because we're trying to give them a
4 foundational institution to help the entire child.
5 And we believe that academic measurements
6 alone are not sufficient to measure whether we're effective
7 as an institution.

8 Q. Can you turn to Joint Exhibit 7?
9 A. (Witness complies.)
10 Yes.
11 Q. Is this the Charter Agreement?
12 A. Yes, it is.
13 Q. And you signed this on behalf of I-LEAD
14 Charter School?
15 A. Yes.
16 Q. You just alluded to social problems of
17 students.
18 A. Right.
19 Q. Do you recall the management of that type of
20 student being a concern of the Board?
21 A. Yes.
22 Q. The Reading School Board?
23 A. I think the Board understood even better
24 than we did what the nature of the student body was. And
25 they were concerned to make sure that we would have an

107

<p>1 adequate Team of Counselors to be able to address the many 2 difficult social problems that the students were 3 encountering.</p> <p>4 Q. And that's reflected in Paragraph 1? 5 A. Correct. 6 Q. Can you read that? 7 A. The Charter School will provide to the 8 District the following budget items prior to the start of 9 the first year: Mental health workers, social workers, 10 attendance officers, food service for 150 students in year 11 1 and 300 students in year 2.</p> <p>12 Q. Can you read Paragraph 7? 13 A. The Charter School will comply with all 14 applicable Pa. Department of Education site and building 15 requirements including, but not limited to, environmental 16 regulations.</p> <p>17 Q. One more reading assignment. Can you read 18 Paragraph 11? 19 A. Sure. The Charter School will observe the 20 provisions of the I-LEAD Charter application which are 21 attached hereto and made part of this Charter Agreement.</p> <p>22 Q. And in your view, Paragraph 11 is 23 referencing Charter School Exhibit 1. Is that correct? 24 A. That is correct. 25 Q. When you signed the agreement -- where did</p> <p style="text-align: right;">108</p>	<p>1 ability to do was to prioritize in terms of a spot. 2 So if we ran out of spots, we could give 3 priority to a student that was a dropout or an at-risk 4 student as we define at-risk students and -- 5 Q. That paragraph says provide education for 6 Grades 9 through 12? 7 A. Yes. 8 Q. But you had submitted an application that 9 didn't even contain curriculum for Grades 9 and 10? 10 A. That's correct. That's correct. 11 Q. Am I correct that in Paragraph 1 of this 12 Charter Agreement, the School District was requiring you to 13 do certain things prior to opening? 14 A. Yes. 15 Q. Was one of those things supply a curriculum 16 for Grades 9 and 10? 17 A. No. In fact, I believed that we had 18 addressed that issue, which we knew was an issue, in 19 Paragraph 9. It said the Charter School will comply with 20 all secondary education curriculum requirements, including 21 those applicable to the District. 22 So what they were telling us was they 23 wanted to conform our curriculum to the Pennsylvania State 24 standards, plus any that they themselves were under and, 25 otherwise, it was pretty much whatever we wanted to do.</p> <p style="text-align: right;">110</p>
<p>1 you sign the agreement? 2 A. We did not physically appear to sign the 3 agreement. We signed it, you know, by exchanging 4 signatures via electronic means, but I was concerned about 5 that, and I raised a pointed question to our Counsel at the 6 time. So I'm very confident that the -- that that 7 attachment was the attachment to this document and not the 8 application.</p> <p>9 Q. Can you read Paragraph 10? 10 A. The Charter School will provide education 11 for Grades 9 through 12, but will give preference in 12 enrollment to dropout students consistent with its 13 application.</p> <p>14 Q. What was your understanding of the effect of 15 that paragraph? 16 A. Well, my understanding of the effect of 17 that was that we were going to try our best to recruit low 18 income students, to recruit dropout students, to recruit 19 at-risk students, but that we could not -- if we did not 20 have enough of them to fill up the School, that we had to 21 admit -- legally had to admit anybody else that showed up.</p> <p>22 So in other words, my understanding of that 23 paragraph is that we had a legal obligation to admit any 24 student that showed up in Grades 9 through 12 who wanted 25 entry to the School. And the only thing that we had the</p> <p style="text-align: right;">109</p>	<p>1 And we were concerned about that, but our approach was to 2 try to create a strong partnership with the District so 3 that we could be transparent and open at every step along 4 the way, what are we doing, how are we doing it, and let 5 them observe and process feedback that they would give us.</p> <p>6 Q. So the Charter Agreement is executed. I 7 believe that if you turn to Page 3 of Joint Exhibit 7, 8 what's this? What is Page 3? 9 A. Is that the signature page, is that what 10 you're referring to? 11 Q. No, this is Page 3 (indicating). 12 A. Oh, the Addendum, yes. This is an Addendum 13 that was done later in the year, in June, because we were 14 not able to get an AUN number from the Commonwealth, which 15 is required to run a Charter School, unless we had a date 16 -- a start date specified in our Charter Agreement. 17 And we did not have a start date specified, 18 so we had to return to the District to seek this amendment 19 to specify a start date.</p> <p>20 Q. What was that start date? 21 A. It was September of 2011. 22 Q. Do you remember how many students you had at 23 that first school year? 24 A. I don't recall the exact number, to tell 25 you the truth, sitting here today.</p> <p style="text-align: right;">111</p>

<p>1 Q. Would you be able to know how many of those 2 students met the preference criteria referenced in 3 Paragraph 10 of the Charter Agreement? 4 A. I don't recall the exact number. I do 5 recall that we went to extraordinary lengths to try to 6 recruit that population. 7 Q. Such as what? 8 A. Such as canvassing the community with 9 recruiters, trying to find people that were dropouts, 10 trying to find parents who were concerned that their 11 students were academically under performing so that they 12 were at risk of dropping out. 13 It was our understanding that you could 14 pretty much know that you were looking at a dropout if you 15 had somebody that was experiencing high truancy, if they 16 were experiencing academic failure, if they were 17 experiencing severe social problems. We knew that they 18 were at risk of dropping out, likely to drop out. 19 We tried to go first for students that were 20 actual dropouts, and then we tried to go next for the 21 students that were the lowest performing students that we 22 could find, the most at-risk students that we could find. 23 Q. How do you reach someone who's dropped out 24 of school? 25 A. You go out into the community and talk to</p> <p style="text-align: right;">112</p>	<p>1 A. For every student we enroll, we send an 2 enrollment form to the District. 3 Q. And then what is the process by which you 4 get paid for those students? 5 A. We would then submit an invoice to the 6 Commonwealth, which the District is also copied on. 7 Q. At any point in the School's history, to 8 your knowledge, has the District ever objected to the 9 payment of any of those invoices? 10 A. No. 11 Q. Have they ever objected to the payment of 12 those invoices based on a particular student not meeting an 13 enrollment criteria? 14 A. No. There have been questions raised later 15 on. In our life there were questions raised by Board 16 members, but there was never a formal objection raised on 17 any enrollment form that we sent over to the District. We 18 sent hundreds of them over. 19 Q. And the period that I just spoke for, from 20 the beginning till now, that's what we're talking about? 21 A. Yes. 22 Q. So during the entire period of your first 23 term up to the renewal period, there was never any formal 24 objection? 25 A. There was never any formal objection to</p> <p style="text-align: right;">114</p>
<p>1 community leaders and you talk to parents, and that's 2 something that we're great at because we have a ten-year 3 history of working block by block by block with staff that 4 has deep roots in these neighborhoods and streets. 5 Q. That first year of operation -- 6 A. Let me say, also, that we generated 7 something on the order of -- I want to say it was between 4 8 and 500 affidavits from parents -- this is during the 9 application phase -- who told us that their students were 10 at risk of academic failure, at risk of dropping out, and 11 they wanted the alternative of I-LEAD Charter School. 12 So from the process of generating those 13 affidavits, we had an enormous set of contacts with actual 14 parents who we knew would be interested in enrolling their 15 students in the school. 16 Q. Are those affidavits contained in the 17 revised application appendices, do you know? 18 A. They may well have been. I think they may 19 have been referenced in one of the cover letters. I don't 20 remember, to tell you the truth. We may have had a summary 21 of them. I don't know, but we did have them. 22 Q. When a student enrolls at I-LEAD Charter 23 School, is the District made aware of that? 24 A. Absolutely. 25 Q. How are they made aware of that?</p> <p style="text-align: right;">113</p>	<p>1 those enrollment forms. There were questions raised about 2 -- by Board members about our service to students that were 3 less than 17 years old, and we had dialogue with numerous 4 -- numerous occasions of dialogue with representatives of 5 the District, Board members, and even actual meetings -- 6 some actual meetings to discuss this. And, essentially, in 7 those meetings we related -- the same things that I've been 8 relating here were related in those meetings. 9 I believe that the issue arose originally 10 because there were Board members that came onto the Board 11 who were not on the Board during the period that the 12 Charter was formed, and those were generally the people 13 that were asking the questions. 14 Q. So in other words, there was a conflict -- 15 A. Yes. 16 Q. -- regarding what the Charter said about who 17 could be at the School? 18 A. I'm not sure I would even characterize it 19 as a conflict as it manifested during that time. I would 20 characterize it as an inquiry, questions, and people that 21 had offered different perspectives of it. They offered 22 their perspectives. We offered our perspective. And, 23 generally, to my knowledge, the problem went away. 24 Q. During the first two years of the Charter, 25 did you enroll students who were not dropouts?</p> <p style="text-align: right;">115</p>

1 A. Yes, we did.
2 Q. Did you enroll students who were not at
3 risk, according to your definition?
4 A. I don't believe we did. I believe that
5 every student that we enrolled was at risk.
6 Q. In what way?
7 A. During our enrollment process, the parents
8 of the student had to tell us that they believed that their
9 child was at risk. That was part of our standard for
10 enrolling people. And by at risk I mean suffering with
11 some kind of academic performance, truancy issue, social --
12 serious social problem, that kind of risk.
13 Q. In the cover letter of the revised
14 application, you state that you intend -- I-LEAD Charter
15 School intends not to recruit kids younger than 17. I'm
16 paraphrasing.
17 A. In that June 10th letter?
18 Q. We have it right here (indicating.)
19 A. Yeah.
20 Q. The first page of Joint Exhibit 5.
21 A. Um-hum.
22 Q. Can you read -- there's numbered
23 paragraphs -- Paragraph No. 1?
24 A. Yep. Paragraph 1, do you want me to read
25 the first paragraph?

116

1 Q. Yeah.
2 A. Pursuant to Pennsylvania Charter School
3 Law, the --
4 Q. No. Next to No. 1. Further down the page.
5 A. Oh, that Paragraph No. 1. Okay. The
6 revisions clarify the proposed School's intent not to
7 recruit students planning to attend the 11th and 12th grade
8 at Reading High School, but rather to recruit only students
9 aged 17 and older who have dropped from the District's
10 rolls and are no longer attending School. The Founding
11 Coalition recognizes that these students may have dropped
12 from the District's rolls as early as the 9th or 10th
13 grades.
14 Q. So can you explain what happened between
15 June 4th and the first year of your operation where you
16 just stated that you enrolled students who were not
17 dropouts?
18 A. Well, what happened was -- two things
19 happened. No. 1, the Board told us that they didn't like
20 that. They didn't want us to be limited in age in that
21 way, and that they didn't want us to be limited grade-wise
22 as we were proposing.
23 MS. PETERSEN: I would just like to renew
24 my hearsay objection and ask that it be considered
25 continuing with respect to any conversations or

117

1 statements by former Board members of the Reading School
2 District.
3 HEARING OFFICER: It's noted. And when I
4 have to do what I have to do, I'll consider it.
5 MS. PETERSEN: Thank you.
6 HEARING OFFICER: You may continue, Mr.
7 Castro.
8 THE WITNESS: Thank you. And
9 secondarily, the Board awarded a Charter which was
10 completely inconsistent with the statements in the cover
11 letter. So -- and as I said, we were surprised when that
12 happened.
13 BY MR. STACEY:
14 Q. So you enrolled students who were not
15 dropouts?
16 A. Yes, we did.
17 Q. You enrolled students who were younger than
18 17?
19 A. Yes, we did.
20 Q. For all of those students an enrollment
21 notification form went to the District?
22 A. Correct.
23 Q. For all those students for whom you invoiced
24 the State, a copy went to Reading School District?
25 A. Correct.

118

1 Q. And that happened throughout the first --
2 that's been happening ever since you started operation?
3 A. Correct.
4 Q. As part of that, it happened during the
5 first two years of operation?
6 A. Absolutely. From day one. It started
7 happening in -- it started happening in the spring of 2011
8 when we were doing startup for the School.
9 Q. Can you go to Joint Exhibit 8, please?
10 A. (Witness complies.)
11 Q. Page 2. Can you read what's next to GEN-51?
12 A. Yes. This is a resolution dated
13 October 30, 2013, of the School Board. Be it resolved that
14 the Board of Directors of the Reading School District,
15 pursuant to the provisions of 24 P.S. 17-1720-A, renews the
16 Charter for I-LEAD Charter School for a period of five
17 years to begin at the expiration of their current
18 three-year Charter.
19 Q. So the School District was paying for these
20 students who were not dropouts and were younger than 17?
21 A. Correct.
22 Q. And they renewed your Charter?
23 A. Yes.
24 Q. Can you turn to Joint Exhibit 2?
25 A. Joint Exhibit 2.

119

1 (Witness complies.)
2 Yes.
3 Q. Do you know what this document is?
4 A. I believe this is a letter to our Counsel
5 from Allison Petersen dated August 8, 2014.
6 Q. Beginning with the second paragraph, second
7 sentence of the second paragraph at the bottom of that
8 first page, can you read the next few sentences?
9 A. Beginning with the second sentence?
10 Q. Yes, please.
11 A. The Charter reflects the School District's
12 expectation that the Charter School's enrollment will be
13 consistent with the representations made in I-LEAD's
14 revised Charter School Application and in the proceedings
15 leading up to the grant of the initial Charter. Those
16 representations unequivocally indicated that the Charter
17 School would be enrolling students who were age 17 or older
18 and who had dropped out of school. Those parameters are
19 legally permissible and consistent with the Charter School
20 law which permits a particular at-risk group to be targeted
21 based on criteria outlined in the Charter Application. 24
22 P.S. Section 17-1723-A, the School Board never approved any
23 enrollment criteria that differed from those
24 representations.
25 Q. And the date of this letter is August 8,

120

1 2014?
2 A. Yes.
3 Q. So this is after you had been renewed?
4 A. Yes.
5 Q. Do you remember receiving a copy of this
6 letter from your attorney?
7 A. Yes.
8 Q. Do you remember having a reaction to that
9 paragraph?
10 A. Yes. I was flummoxed. It didn't make any
11 sense to me. I did not understand what universe I was
12 living in.
13 Q. Can you turn to Exhibit 3, same binder,
14 Joint Exhibit 3?
15 A. Joint Exhibit 3, same binder.
16 (Witness complies.)
17 Yes.
18 Q. The bottom of Page 2, can you read that
19 paragraph?
20 A. The bottom of Page 2, the Charter School?
21 Q. Yes, please.
22 A. The Charter School is not --
23 Q. I'm sorry. Are you on Exhibit 3?
24 A. I'm sorry, on the bottom of Page 2, for the
25 past year?

121

1 Q. That's correct.
2 A. For the past year the District has
3 communicated with the Charter School on various occasions
4 about the implementation of accountability standards. The
5 Charter School has never indicated that it would be willing
6 to agree to impose standards on itself.
7 Q. Stop right there. What's your reaction to
8 that last sentence?
9 A. It's not true.
10 Q. Continue.
11 A. To avoid the time and expense of revocation
12 proceedings, the District is willing to make one more
13 attempt to reach a resolution on such standards. If the
14 Charter School agrees to the following accountability terms
15 and conditions as part of a renewal Charter acceptable to
16 the District, the term of which would -- the term of which
17 would be from the 2014/15 school year through the 2018/19
18 school year renewal term, the School District would agree
19 to forego revocation at this time and to continue to
20 monitor the performance and operations of the Charter
21 School during the renewal term.
22 Q. Stop right there. The accountability terms
23 as they're called are on the next three pages.
24 A. Yep.
25 Q. On June 5th, 2015, were you on the Board?

122

1 A. I believe I was still on the Board on June
2 5th.
3 Q. As a Board member for the Charter School,
4 were there discussions by the I-LEAD Charter School Board
5 regarding this proposal?
6 A. Yes.
7 Q. Did the Charter School agree to these
8 accountability terms?
9 A. Reluctantly, yes, we did.
10 Q. And did the Charter School authorize its
11 attorneys to represent to Ms. Petersen that the Charter
12 School would agree to these terms?
13 A. Yes.
14 Q. Can you go to Joint Exhibit 1, same binder?
15 A. (Witness complies.)
16 Yep.
17 Q. Page 2, very bottom, Paragraph 9.
18 A. Yep.
19 Q. Can you read that?
20 A. By letter dated June 15th, 2015, the
21 Charter School, through Counsel, responded to the June 5th,
22 2015 letter. A copy of the letter is attached hereto as
23 Exhibit F. As indicated in the letter, while the Charter
24 School believed the June 5th, 2015 letter proposed a number
25 of unnecessary and unrealistic terms and provisions, it

123

1 would agree to sign a Charter containing the proposed terms
2 to avoid the expense of litigation. Exhibit F at 1.
3 Q. Is that paragraph consistent with the
4 testimony that you just gave?
5 A. Yes.
6 Q. Sorry to keep having you flip back. I want
7 to go back to Exhibit 3 again.
8 HEARING OFFICER: Mr. Stacey, we said we
9 were going to take a lunch break. I was trying to get a
10 good point. Do you want to do that now before we go to
11 another exhibit?
12 MR. STACEY: Yeah, we can do that now.
13 That's fine.
14 HEARING OFFICER: So we'll take a recess
15 for lunch. Let's still try to come back at 1:30.
16 MS. PETERSEN: Off the record.
17 (Discussion was held off the record.)
18 HEARING OFFICER: We're off the record
19 until 1:40.
20 (Lunch recess was taken.)
21 HEARING OFFICER: It is 1:40 p.m., and I
22 thank Counsel and the witness for coming back so promptly
23 from our lunch break. We will reconvene and continue
24 with the direct-examination of the witness.
25 BY MR. STACEY:

124

1 Q. Mr. Castro, I think we were at Joint
2 Exhibit 3.
3 A. Yes, Joint Exhibit 3. Gotcha.
4 Q. Just to refresh everybody's recollection,
5 what are we looking at here?
6 A. A June 5th, 2015 letter from Attorney
7 Allison Petersen to our Counsel, Bob O'Donnell.
8 Q. And within that letter are the terms for a
9 Charter Agreement proposed by the School District. Is that
10 correct?
11 A. Correct.
12 Q. Can you go to Page 3, please?
13 A. (Witness complies.)
14 Yes.
15 Q. The paragraph that says Academic
16 Performance.
17 A. Yes.
18 Q. Can you read that paragraph, please?
19 A. Sure. The Charter Board agrees to
20 administer the Keystone Exams or any other standardized
21 testing required under applicable law, and meet the
22 curriculum, instruction and assessment requirements set
23 forth in Title 22, Pa. Code Chapter 4 or subsequent
24 regulations published by the State Board of Education. The
25 School District expects that the Charter School's academic

125

1 performance will improve substantially during the Renewal
2 Term and that it will ultimately meet or exceed the
3 academic performance, growth and other metrics of the
4 Reading Senior High School. Accordingly, the Charter Board
5 further agrees that the Charter School's percentages of
6 students scoring Advanced or Proficient on each of the
7 Keystone Exams shall increase, at a minimum, at the rates
8 set forth in the following metrics for each year of the
9 Renewal Term.
10 Q. Stop there. When you refer to that chart
11 right below what you just read, there's a row that says
12 Literature.
13 A. Yes.
14 Q. Then there are columns. One says '13/14
15 Baseline and then the years going out from '13/14 are going
16 across the top there?
17 A. Correct.
18 Q. By what percentage per year in efficient and
19 advanced students was the District asking I-LEAD Charter
20 School to adhere to with respect to standardized test
21 scores in literature?
22 A. It's about seven percent, so requesting
23 seven percent growth each year.
24 Q. What about in Algebra 1?
25 A. Requesting a ten percent growth each year.

126

1 Q. Does this proposal contain the alternative
2 methods of measuring academic performance?
3 A. To my knowledge, no, it does not.
4 Q. What did the I-LEAD Charter School Board
5 think of this particular part of this proposal?
6 A. We thought it was unachievable.
7 MS. PETERSEN: Objection. Based on
8 hearsay. He can speak for himself, but not for others on
9 the Board.
10 HEARING OFFICER: Why don't you rephrase
11 the question.
12 MR. STACEY: I think the witness has
13 stated that he was on the I-LEAD Charter School Board at
14 the time this letter was received.
15 MS. PETERSEN: I don't have an objection
16 to him stating what his reaction was to it.
17 HEARING OFFICER: Mr. Castro, did you
18 participate in any deliberations with the Board of
19 Trustees as to this particular academic standard as set
20 forth in this letter?
21 THE WITNESS: Yes, I did.
22 HEARING OFFICER: Why don't you tell us
23 about that.
24 THE WITNESS: It was the sense of the
25 Board that these requested benchmarks or these requested

127

1 goals were unachievable and unrealistic, given the nature
2 of our population.
3 BY MR. STACEY:
4 Q. But despite that, you authorized your
5 attorney to represent to Ms. Petersen that you agreed to
6 these terms, or rather the Charter School agreed to these
7 terms?
8 A. Yeah, I think we chose to state that we
9 would agree to them under duress because we felt that it
10 was -- the threat of a revocation proceeding would be
11 extremely expensive, time consuming, damaging to the
12 School, damaging to the school's reputation, damaging to
13 the ability of the staff and the School as an institution
14 to meet any objectives because of the level of distraction
15 that would be introduced then to essentially being involved
16 in a litigation war with the District.
17 So we felt that it would be better to
18 attempt to continue to negotiate with the District and
19 accede to these demands under the duress of their
20 litigation threats.
21 And then, further, we were actively
22 considering an amendment -- that we would seek an amendment
23 regarding the nature of the academic standards imposed on
24 the School. So that was also something that we had
25 considered at various points throughout the process.

128

1 I would also comment and say that we were
2 in active dialogue with the Board members and with the
3 Administration of the School, and we had discussed academic
4 standards that were nothing like these academic standards.
5 They were not as aggressive and unachievable.
6 We had even pitched our own alternative
7 measures to the District and to the Board members, and so
8 we were also just very confused and at a loss to understand
9 how these had even been generated because they weren't in
10 the realm of what we had been discussing.
11 Q. When you say participated in discussions
12 about those other standards, that was you said with the
13 Board and Administration?
14 A. Yes. We had discussed -- we met with Board
15 members and discussed those proposals as individuals, and
16 we had also met with Dr. Mumin and Chris Celmer, and I
17 believe that members of our Academic Team, including Angel
18 Figueroa and Dr. Smith had met with representatives of the
19 School District to discuss what would be a rational
20 academic standard for the School.
21 Q. Was any agreement reached?
22 A. I don't believe an agreement was reached.
23 MS. PETERSEN: Objection. Foundation.
24 He's not established that he was there.
25 HEARING OFFICER: Sustained.

129

1 BY MR. STACEY:
2 Q. Did you participate in conversations with
3 the Administration or Board members regarding academic
4 standards?
5 A. I did participate in some discussions with
6 Board members and with the leadership with the School, and
7 there were other conversations that I did not participate
8 in. To my knowledge, there was -- you know, based on these
9 series of meetings, it was never communicated to us that a
10 final decision had been made regarding what the standards
11 would be.
12 Q. Can you flip back to Joint Exhibit 2?
13 A. Okay.
14 (Witness complies.)
15 Q. Beginning on Page 3.
16 MR. CIANCI: On page what?
17 MR. STACEY: Page 3 of Joint 2.
18 MR. CIANCI: It's only two pages.
19 THE WITNESS: Are you on a different one?
20 MR. STACEY: There should be 14 pages
21 total. This is the binder that was given to me by
22 Counsel, Joint Exhibit 2, Letter to I-LEAD with Proposed
23 Charter Agreement.
24 THE WITNESS: My Exhibit 2 is August 8th,
25 2014 letter to --

130

1 MR. CIANCI: Yeah, that's the letter, but
2 it appears that the proposed Charter Agreement is not
3 there.
4 MS. PETERSEN: Can we go off the record?
5 (Discussion was held off the record.)
6 HEARING OFFICER: If we have the same
7 document, we can go back on the record.
8 THE WITNESS: Page 3.
9 BY MR. STACEY:
10 Q. What is this document?
11 A. I believe this is another version of an
12 amended Charter which was presented to us in August of
13 2014.
14 Q. Can you go to Page 2 of that proposed
15 Charter?
16 A. (Witness complies.)
17 Yes.
18 Q. Can you read Paragraph 4 and Paragraph 4
19 (a)?
20 A. The Charter is authorized to operate during
21 the Renewal Term only with Grades 9 through 12. In
22 addition, the following requirements apply during the
23 Renewal Term: The Charter School may enroll only those
24 students who are age 17 or older and who meet the
25 definition of dropout prior to enrollment at the Charter

131

<p>1 School as defined herein. For purposes of the Charter, a 2 dropout is defined as any student who before enrolling at 3 the Charter School was not enrolled in School and had not 4 completed high school or earned a G.E.D.</p> <p>5 Q. Thank you. I'll ask you to keep that Tab 6 and briefly go back to Joint Exhibit 3 and look through 7 that and tell me whether that provision remains in the 2015 8 proposal.</p> <p>9 A. (Witness reviewed document.) 10 In the 2015 proposal that provision does 11 not appear.</p> <p>12 Q. So it was no longer the District's position 13 at that point that you were required to enroll kids 17 and 14 over?</p> <p>15 A. That's right.</p> <p>16 Q. At least it wasn't in their proposed --</p> <p>17 A. It wasn't in their proposed Charter 18 Amendment.</p> <p>19 Q. Do you know why that would be the case?</p> <p>20 A. Well, I find it to be consistent with our 21 dialogue with them about this issue all the way along, 22 which was that members would raise the issue, and then we 23 would have conversations with them about how exactly the 24 Charter was formed, why the Charter was different than what 25 had been in the revised application, and once the members</p> <p style="text-align: right;">132</p>	<p>1 increase four percent per year?</p> <p>2 A. No, they did not.</p> <p>3 Q. The proposed academic performance standards 4 in the 2014 proposal and the 2015 proposal, in your view, 5 are they consistent with commitments made at the time of 6 the granting of the Charter?</p> <p>7 A. No, they're not.</p> <p>8 Q. Why not?</p> <p>9 A. Well, for two reasons. I don't think it 10 would be consistent because there were, in my view, no 11 commitments made because at the time that they granted the 12 Charter, they revised the design of the institution so 13 substantially that the academic performance goals that we 14 had laid out really didn't make sense.</p> <p>15 So they weren't comprehensive, they weren't 16 sufficient, so they were really -- in that sense, they 17 weren't consistent because we were dealing with a 18 completely different institution than we had envisioned in 19 the revised application.</p> <p>20 And beyond that, I don't think they make 21 sense -- any of these proposals make sense because they are 22 not a rational measure of the performance of the School 23 based on the nature of the students that we serve and the 24 way in which we serve those students.</p> <p>25 Q. Is that one of the reasons you're seeking an</p> <p style="text-align: right;">134</p>
<p>1 were educated about that difference, they usually dropped 2 that request. Once they were educated about it and they 3 understood the course of performance of the parties, they 4 dropped it.</p> <p>5 Q. Going back to Joint 2, this would be now on 6 Page 3 of the 2014 proposed Charter Agreement, Paragraph 6 7 at the bottom, read the first couple sentences of that 8 paragraph.</p> <p>9 A. Paragraph -- oh, paragraphs. Sorry. 10 Academic Performance, the Charter Board agrees to 11 administer the Keystone Exams and meet the curriculum, 12 instruction and assessment requirements set forth in 22 Pa. 13 Code Chapter 4 or subsequent regulations published by the 14 State Board of Education. The Charter Board further agrees 15 that the Charter School's percentages of students scoring 16 Advanced or Proficient on each of the Keystone Exams shall 17 increase by four percent per year during the Renewal Term.</p> <p>18 Q. That's good. Thank you. Did the District 19 ever provide you with a written justification as to why in 20 2015 it believed your score should increase on the order of 21 seven to ten percent per year rather than four percent per 22 year as contained herein?</p> <p>23 A. No, they did not.</p> <p>24 Q. At the time of the 2014 proposal, did they 25 ever give you any justification why your scores should</p> <p style="text-align: right;">133</p>	<p>1 amendment to your Charter?</p> <p>2 A. Yes.</p> <p>3 Q. Is it fair to say that there was confusion 4 as to what the academic goals of the Charter ought to be?</p> <p>5 A. Yes. I think there was -- I don't think 6 there was confusion on our part within the institution as 7 to what we thought our academic goals were. We had 8 aggressive academic goals every year, but there was not a 9 consensus with the District about how those goals would be 10 expressed within our Charter in a way that would operate as 11 a meaningful measure of our performance as an institution.</p> <p>12 Q. Thank you. Jump to Paragraph 7, Contract 13 Preparation. Can you read that?</p> <p>14 A. Yes. No later than 30 days after the 15 execution of this Charter, the Charter School shall prepare 16 and execute contracts with I-LEAD, Inc., Harcum College, 17 delineate the relationship between the entities, 18 including --</p> <p>19 Q. I think you missed a line there.</p> <p>20 A. I'm sorry -- Harcum College, and any other 21 entity that is utilizing the Charter School facilities. 22 Such contract shall delineate the relationship between the 23 entities including, but not limited to, services to be 24 performed; sharing of staff; utilization of the Charter 25 School's space; fees, costs and expenses; and any other</p> <p style="text-align: right;">135</p>

<p>1 manners that affect the operations of the Charter School, 2 as applicable. Such contracts shall be provided to the 3 School District upon complete execution. 4 Q. Thank you. Exhibit 5, can you turn to Page 5 -- this is the revised application, Joint Exhibit 5. I 6 believe it's Page 52. 7 A. (Witness complies.) 8 Page 52, yes. 9 Q. The top of Page 52 under III.2, Governance. 10 A. Yes. 11 Q. It says Management Organization. 12 A. Yes. 13 Q. Can you read the first two sentences of that 14 paragraph? 15 A. The Reading Leadership Institute Charter 16 School Board of Trustees will consist of the seven-member 17 I-LEAD Board of Directors. Day-to-day operation of the 18 School will be delegated to the CEO, who will serve as an 19 ex officio member of the Board of Trustees. The Board of 20 Trustees will confer at regular intervals with a 21 nine-member School Advisory Council. Two members of the 22 School Advisory Council will be currently enrolled as 23 learners, two will be parents of a currently enrolled 24 learner, and the remaining five members will be residents 25 of the City of Reading.</p>	<p>1 work for I-LEAD, Inc.? 2 A. Yes, correct. 3 Q. Which is completely different than the 4 original application? 5 A. Correct. 6 Q. Why would you request something that's 7 completely different from the original application? 8 A. Well, we wanted to be clear. This was 9 something that arose as a concern. Our -- we believe that 10 we have conducted our relationship with the School legally 11 and ethically. We have served -- 12 Q. We being I-LEAD? 13 A. I-LEAD, Inc., we have worked to be in the 14 role of providing philanthropic and resource support to the 15 School and -- but we were not concerned about the requests 16 that were being made by the District in regard to drawing 17 these lines so that it was also clear to everyone the way 18 in which the two organizations were collaborating. And so 19 we felt that we wanted to make this amendment request so 20 that would be a hundred percent transparent and clear and 21 put into the Charter. 22 I guess I could say further that -- well, 23 leave it there. 24 Q. During your time as a Board member of the 25 Charter School, did the Board authorize the staff to file</p>
136	138
<p>1 Q. That's good. Thank you. So can you compare 2 that from the application with -- scratch that. So the 3 application says that I-LEAD, Inc.'s Board of Directors 4 will be the I-LEAD Charter School Board of Directors? 5 A. Correct. 6 Q. The Boards will be one and the same? 7 A. Correct. 8 Q. Joint Exhibit 3, Page 2, am I correct that 9 in the letter from Counsel, the second paragraph on Page 2, 10 that the concern is about the two entities, referring to 11 I-LEAD, Inc., and I-LEAD Charter School, sharing common 12 Board members -- 13 A. Yes. 14 Q. -- and/or employees? 15 A. Yes. 16 Q. Now, if you turn back to Joint Exhibit 1, 17 Page 7, this is the Charter Amendment. What is this 18 section of the Charter Amendment seeking to do? 19 A. This section of the Charter Amendment is 20 seeking to address concerns about the relationship between 21 the two institutions, to clarify that they will have 22 separate Boards, and that they will not have shared 23 employees, and other matters pertaining to governance. 24 Q. 23 (a) says none of the Board members of the 25 Charter School shall serve on the Board of I-LEAD, Inc., or</p>	<p>1 Annual Reports with the School District and the Department 2 of Education? 3 A. Yes. 4 Q. Is Charter School Exhibit 3 one of those 5 Annual Reports? 6 A. Yes, it is. 7 Q. And in Charter School Exhibit 2 -- can you 8 go to Charter School Exhibit 2, please? 9 A. Um-hum. 10 (Witness complies.) 11 Q. Do you recognize this document? 12 A. Yes, I've seen this. 13 Q. Is this a copy of an e-mail from Dr. Yamil 14 Sanchez to purcellc@readingschooldistrict.org? 15 A. Yes. 16 Q. Are you copied on this e-mail? 17 A. Yes, I am. 18 Q. What's going on in this document? 19 A. This is enclosing the Annual Report, that 20 is the one that is referenced in Tab 3. 21 Q. The report in Charter School Exhibit 3; 22 correct? 23 A. Yes. 24 Q. Where we see at the bottom it says 2013 ILCS 25 Charter Annual Report2.doc, that Annual Report was an</p>
137	139

1 attachment to this e-mail?
2 A. Correct.
3 Q. So that e-mail was sent from Dr. Sanchez to
4 the Reading School District Administration?
5 A. Yes.
6 Q. Did the Board also authorize the filing of
7 other reports for the School District?
8 A. Yes. We tried to submit -- well, we did
9 submit both the Annual Report and a Narrative Report to the
10 District each year of our operations.
11 Q. When you say Narrative Report, are you
12 talking about Charter School Exhibits 4, 7 and 8? You can
13 take a look at those.
14 A. Correct. Correct. So we were attempting
15 to provide the District -- we were providing the District
16 both a report that was legally required to be filed by the
17 State and a separate report that we prepared in which we
18 attempted to pull together as much information as we could
19 about our operation because there were many things that you
20 would need to know about our operation to understand it
21 that were not captured in the Annual Report that was
22 legally required.
23 Q. With respect to things like student
24 performance?
25 A. Yes. There were many elements of our

140

1 performance that were not significantly or adequately
2 described in the Annual Report. The Annual Report is
3 specified -- the contents of the Annual Report is specified
4 by PDE, and so that was a report that we had to, you know,
5 legally comply with, and our Team worked on that, but then
6 we also wanted to be able to present a separate Narrative
7 Report in which we could put some of that data in context
8 and add to it other data that we had generated ourselves
9 that would illustrate the challenges and the successes that
10 we were encountering in the work of running the School.
11 Q. Were you here earlier for Cynda Clyde's
12 testimony?
13 A. Yes.
14 Q. And she had testified, I believe, that you
15 authorized her to create what is now Charter School
16 Exhibit 4.
17 A. Correct.
18 Q. I-LEAD Charter School, The Journey Begins?
19 A. Correct.
20 Q. And that's one of these independent reports
21 you're speaking about?
22 A. Yes.
23 Q. Did you also authorize the one for 2013/14?
24 A. Yes.
25 Q. Who did you direct to create that?

141

1 A. While I was serving on the Board of the
2 school, we -- this was part of our plan and practice, and
3 we had a Team that worked on the report. Cynda happened to
4 be working on it in that year, but we had other staff
5 members that worked in the same capacity that she did, you
6 know, pulling this information together. And it involved
7 the Executive Team, it involved -- you know, it was a
8 report that was a Team effort produced by the members of
9 the school.
10 Q. All of these reports were sent to the School
11 District. Is that correct?
12 A. Absolutely.
13 Q. Do you recall ever receiving a response in
14 any of these years to the filing of either the Annual
15 Report or these independent reports from the School
16 District?
17 A. I'm confident that we did not receive any
18 response to any of the reports that we filed, other than,
19 perhaps, an e-mail acknowledgment, you know, got it.
20 Q. There was never any formal recognition?
21 A. No.
22 Q. No formal assessment provided by the
23 Administration?
24 A. No, no effort to conduct a meeting, no
25 effort to ask any questions about any of the material that

142

1 was presented in any of these reports at any time.
2 Q. What about prior to renewal?
3 A. Nothing.
4 Q. Back in Joint Exhibit 5, can you turn to
5 Page 57?
6 A. (Witness complies.)
7 MR. STACEY: Can we pause for a second?
8 (Discussion was held off the record.)
9 BY MR. STACEY:
10 Q. This is Page 57 (indicating).
11 A. Yes.
12 Q. At the top it says Facility, Facilities
13 Under Consideration?
14 A. Yes.
15 Q. What facility was under consideration when
16 this revised application was filed?
17 A. At the time when we filed the revised
18 application, we were considering a property at 600 Spring
19 Street in Reading.
20 Q. Did the Charter School end up moving into
21 that property?
22 A. No, we did not.
23 Q. Where did you move?
24 A. We ended up moving into 200 North 8th
25 Street.

143

1 Q. Did the Charter School keep the District
2 apprised of that move?
3 A. Yes, we did. And the way we handled this
4 was that at the time that the Charter Agreement was framed,
5 we were clear that we were in negotiation with several
6 different potential locations. And so the Charter
7 Agreement was framed in such a way as to specify the
8 District's concern that whatever property we went to would
9 be environmentally sound, that was the commitment that we
10 made, that it would be environmentally sound, but other
11 than that, we did not in the Charter specify a location.
12 That was done intentionally to give us the flexibility that
13 we needed to be able to go and pursue the real estate
14 negotiations required to get the School up.
15 Of course, once we had negotiated a lease,
16 we notified the members of the Board and invited them to
17 come and tour the facility, and many of them did. And, in
18 fact, the environmental soundness of that facility was
19 raised at Board meetings, and we had --
20 Q. Which Board meetings?
21 A. It was raised at a Board meeting in
22 September of 2011, is my recollection. We actually had to
23 hire Spotts Stevens & McCoy to do an asbestos assessment to
24 make sure -- to validate to the District that there wasn't
25 any active asbestos located in that property.

144

1 And Counsel for the time at the Board
2 meeting accepted their report, and the District was advised
3 at that meeting absolutely that we were at 200 North 8th
4 Street.
5 Q. Let's back up a second. What property are
6 we talking about?
7 A. 200 North 8th Street.
8 Q. That's the property the Charter School
9 eventually moved into?
10 A. Correct.
11 Q. You were set to move into that building
12 when?
13 A. We -- my recollection is that we signed the
14 lease on that facility in the spring of 2011.
15 Q. After the Charter Agreement was executed?
16 A. Correct.
17 Q. You were set to begin operation in that
18 building September of 2011?
19 A. Correct.
20 Q. And you said that there was an issue with
21 that property. What was that issue?
22 A. There was no issue with the property.
23 Again, a question was raised as to whether the property
24 complied with asbestos, Federal asbestos regulations. And
25 I'm drawing a blank on the acronym, but there is a Federal

145

1 law pertaining to asbestos certifications for schools and
2 -- wish I could remember the name of it.
3 Q. Is the acronym AHERA?
4 A. Yes, AHERA, exactly.
5 Q. A-H-E-R-A.
6 A. AHERA regulations and the Board Counsel, I
7 believe, Guida --
8 Q. This is the Reading School Board?
9 A. Yes -- raised a question about the AHERA
10 compliance for that property.
11 Q. How was that question raised?
12 A. I believe it was raised in a letter to us.
13 I believe they sent us a letter. I think that Richard
14 Guida sent us a letter questioning -- by Richard Guida, who
15 was then the District's Counsel, sent a letter to us
16 questioning whether the property was AHERA compliant.
17 Q. When was that?
18 A. That would have been -- I don't recall the
19 date, but it was prior to our startup of the school.
20 Q. Okay.
21 A. It was prior to our startup of the school.
22 And also prior to the startup of the school we had Spotts
23 Stevens & McCoy to do a report that testified to its AHERA
24 compliance, and that was presented to Counsel and reviewed
25 at a Board meeting.

146

1 Q. Let me just see if I'm tracking.
2 A. Sure.
3 Q. So the District, through Counsel, raised an
4 issue regarding asbestos certification --
5 A. Correct.
6 Q. -- for lack of a better term?
7 A. Yeah.
8 Q. In order to satisfy that, you had to go get
9 a report done?
10 A. Yes.
11 Q. That report was done?
12 A. Yes.
13 Q. That report was submitted back to the
14 District to their satisfaction?
15 A. Correct.
16 Q. And you were permitted to operate at the 200
17 North 8th Street location?
18 A. Correct.
19 Q. How long were you there?
20 A. We were there until approximately June of
21 2014.
22 Q. After that where were you?
23 A. We were at 401 Penn Street.
24 Q. Tell me about the transition from 200 North
25 8th Street to 401 Penn Street. How did it come about that

147

<p>1 you were going to move?</p> <p>2 A. So in the spring of 2013, we were</p> <p>3 approached by CNA Insurance Company. Their national</p> <p>4 Director of Real Estate and Facilities came to Reading and</p> <p>5 explained in a meeting with myself and Angel Figueroa</p> <p>6 invited, that CNA had been interested in donating their 401</p> <p>7 Penn Street facility to a public charity.</p> <p>8 They essentially discussed with us that</p> <p>9 they had done an exhaustive review of organizations in the</p> <p>10 Reading community, and that they had selected us, and they</p> <p>11 wanted to engage us in a dialogue to determine whether we</p> <p>12 would be interested in this with the vision of using that</p> <p>13 facility to the benefit of the school.</p> <p>14 Q. Who is us and who is we?</p> <p>15 A. So the us there is -- basically, it's</p> <p>16 I-LEAD, Inc., as a public charity receiving the property</p> <p>17 for the use of the school. And so we began then a very</p> <p>18 long and complex series of conversations and dialogs with</p> <p>19 CNA to complete that charitable gift. That led to them</p> <p>20 actually donating the building to I-LEAD, Inc., on</p> <p>21 September 30th, 2013.</p> <p>22 And then from there, we began to work with</p> <p>23 the school to arrange for the school to move into the</p> <p>24 building.</p> <p>25 Q. So when did I-LEAD, Inc., have a firm</p> <p style="text-align: right;">148</p>	<p>1 the property in terms of moving its equipment and furniture</p> <p>2 and administrative staff into the property in June of 2014.</p> <p>3 And then there were regulatory proceedings</p> <p>4 that took place over the summer and -- which involved</p> <p>5 getting zoning permits, E occupancies for the property, and</p> <p>6 then we commenced the operation of the school there in</p> <p>7 September of 2014.</p> <p>8 Q. Did you participate in any meetings with the</p> <p>9 District Administration and/or Board members about the</p> <p>10 property acquisition?</p> <p>11 A. Numerous. Numerous.</p> <p>12 Q. When did those begin?</p> <p>13 A. They began as of the date that CNA publicly</p> <p>14 disclosed its transaction to us. Actually, even in the few</p> <p>15 days leading up to that meeting, we advised members of the</p> <p>16 Board about the transaction. We met with Pierre Cooper,</p> <p>17 and I believe we advised all the other members of the</p> <p>18 transaction.</p> <p>19 They were invited all to attend the</p> <p>20 dedication of the building to I-LEAD and to the school, and</p> <p>21 that was in a ceremony that took place. It was covered in</p> <p>22 the Reading Eagle. Virtually, everybody who knew anything</p> <p>23 about us and knew anything about the city, knew anything</p> <p>24 about Reading, knew about the transaction and our intent to</p> <p>25 use the building as a school.</p> <p style="text-align: right;">150</p>
<p>1 agreement with the CNA Corporation?</p> <p>2 A. We negotiated a donative agreement -- my</p> <p>3 recollection is that we negotiated a donative agreement</p> <p>4 with CNA during the summer of 2013. The transaction was</p> <p>5 not completed until September 30th, 2013, which was the</p> <p>6 date that they deeded the property to us.</p> <p>7 Q. Can you describe 401 Penn Street?</p> <p>8 A. Sure. 401 Penn Street is essentially --</p> <p>9 it's a 250,000 square foot property located at 401 Penn</p> <p>10 Street. It was the headquarters of CNA in Reading, and it</p> <p>11 was not occupied by any entity other than CNA. And it's a</p> <p>12 city block, actually, inside.</p> <p>13 Q. Penn Street is located right downtown here</p> <p>14 in Reading?</p> <p>15 A. Correct.</p> <p>16 Q. You said it's 260,000 square feet?</p> <p>17 A. Approximately, yes.</p> <p>18 Q. That's a pretty big building.</p> <p>19 A. Yes, it is. We immediately, upon receiving</p> <p>20 the property, leased it in its entirety to the school so</p> <p>21 that it could begin to be developed for the use of the</p> <p>22 school. And CNA, in the months after the transaction,</p> <p>23 exited the property.</p> <p>24 We worked throughout that year to set the</p> <p>25 stage for the school to enter, and the school moved into</p> <p style="text-align: right;">149</p>	<p>1 MS. PETERSEN: Motion to strike the</p> <p>2 testimony regarding what others knew about the school.</p> <p>3 HEARING OFFICER: I'll grant that.</p> <p>4 THE WITNESS: So we --</p> <p>5 BY MR. STACEY:</p> <p>6 Q. Hold up a second.</p> <p>7 A. Go ahead.</p> <p>8 Q. When was this party?</p> <p>9 A. It was on the day of the dedication which</p> <p>10 was September 30th.</p> <p>11 Q. Of what year?</p> <p>12 A. 2013.</p> <p>13 Q. So this occurred before renewal?</p> <p>14 A. Absolutely.</p> <p>15 Q. And when your Charter was renewed, was there</p> <p>16 any stipulation that you would now be at 401 Penn Street?</p> <p>17 A. There was not. There was no efforts to</p> <p>18 change the terms of the Charter during the renewal process,</p> <p>19 and we believed that it was not necessary to do so because</p> <p>20 we had a provision in that Charter which allowed us to be</p> <p>21 anywhere that was environmentally sound. Since the</p> <p>22 property was environmentally sound, we knew that it would</p> <p>23 be an acceptable location.</p> <p>24 Q. If that's the case, why are you seeking an</p> <p>25 amendment to state that your Charter location is 401 Penn</p> <p style="text-align: right;">151</p>

1 Street?

2 A. Well, as with other things, questions were

3 raised about the property. I believe, based on

4 conversations, that -- with Board members and with our

5 lawyers that there is an interest in making sure that this

6 Charter specifies a location for the school, and that I

7 think -- it's my understanding that if the original Charter

8 had been framed correctly in terms of -- by the District's

9 Counsel, it would have included a specific location for the

10 School.

11 So we were not against having a specific

12 location listed for the School, so we figured that, in

13 requesting this amendment, it would be a good opportunity

14 to straighten that out and have the Charter conform to the

15 actual location of the School.

16 MR. STACEY: Thank you. I have nothing

17 further.

18 HEARING OFFICER: Cross-examine.

19 MS. PETERSEN: Yes.

20 BY MS. PETERSEN:

21 Q. Good afternoon, Mr. Castro.

22 A. Good afternoon.

23 Q. We are in the afternoon now, firmly.

24 A. Yes.

25 Q. You had started out in the beginning giving

152

1 us sort of a history with I-LEAD, Inc., and then also with

2 the Charter School, and I just want to expound upon that a

3 little bit more. You indicated now that you are pro bono

4 Counsel for the Charter School?

5 A. Yes.

6 Q. Do you recall that?

7 A. Yes.

8 Q. What does that mean?

9 A. What it means is that I'm participating in

10 consultations with the lawyers and assisting the Board in

11 understanding and processing advice of Counsel.

12 Q. So you are providing legal Counsel to the

13 Charter School's Board?

14 A. Yes, I am.

15 Q. And you still remain in your role at I-LEAD,

16 Inc., as Executive Director/President/CEO?

17 A. Correct.

18 Q. So you have continued on in that role

19 continuously since I-LEAD, Inc., was formed?

20 A. That's correct.

21 Q. And you are compensated in that role;

22 correct?

23 A. Correct.

24 Q. And by the Inc.?

25 A. Yes, exactly. It wasn't always the case,

153

1 but I have been at least for the last 15 or 20 years.

2 Q. Good for you. So in terms of your Counsel

3 to the Charter School, you said that is pro bono, you are

4 not receiving compensation for that?

5 A. Nothing.

6 Q. Not in kind or --

7 A. Nothing.

8 Q. -- monetarily?

9 A. Zero. It is costing me money.

10 Q. Now, that was a change in terms of your role

11 at the Charter School; correct?

12 A. Before I became Counsel to the Board, I was

13 Chair of the Board, and then there was a point at which I

14 resigned from the Board. So all those things happened.

15 Q. So let's try to get the timing of that

16 correct.

17 A. Sure.

18 Q. You were on the Charter School's Board from

19 the inception of the Charter School; correct?

20 A. Yes.

21 Q. At what point in time did you step down as

22 Chair?

23 A. I believe it was August of 2014.

24 Q. And as of August, 2014, did you then resign

25 from the Board --

154

1 A. I did not.

2 Q. -- or did you continue on?

3 A. I continued on as a member of the Board.

4 Q. And at what point in time did you resign

5 from the Board, if that's accurate?

6 A. I resigned from the Board in June of 2015.

7 Q. And you have not been on the Board since

8 June of 2015?

9 A. Correct.

10 Q. Did anyone from the Charter School notify

11 the School District that you had resigned from the Board?

12 A. Well, I believe so in the sense that what

13 we had -- we had stated in our -- we had stated in response

14 to the request that came in June to separate the two

15 institutions from a Board perspective, that we would do

16 that. And we then -- and that we were prepared to comply

17 with representations and warranties to that effect.

18 And then we also, I believe -- so we made

19 sort of in the sense of saying yes, we are prepared to do

20 that and we are doing it, so it was my belief that Counsel

21 had communicated that decision to Board's Counsel.

22 Q. You think Mr. O'Donnell, your Counsel, had

23 done that?

24 A. Yes, I believe so. And I also believe that

25 there's been several requests for Board Minutes, and I

155

1 think that the Minutes reflect those changes.
2 Q. So let's piece this out a bit.
3 A. Yeah.
4 Q. Is the communication that you're recalling
5 from Mr. O'Donnell where it was disclosed about the changes
6 in the Board membership, was that the June, 2015 letter?
7 A. Yes, I believe that -- that's my
8 recollection. That's my recollection of the date of my
9 resignation, is that it followed our statement in response
10 to that request that was made in June that we would comply
11 with the requests that had been made in connection with
12 that amended Charter.
13 And we attempted then to follow through.
14 And we did have all the I-LEAD staff members resign from
15 the Board at that time.
16 Q. So if you could, turn to Joint Exhibit
17 No. 1.
18 A. (Witness complies.)
19 Okay.
20 Q. And specifically within Joint Exhibit No. 1,
21 Exhibit F.
22 A. Exhibit F. Mine have numbers, not --
23 Q. No, go to Joint Exhibit 1, please.
24 A. Okay. Joint Exhibit 1. And then Exhibit F
25 of that?

156

1 Q. Correct.
2 A. (Witness complies.)
3 MR. CIANCI: It's the 28th page.
4 THE WITNESS: Yes, I see it. Yes. Yes.
5 BY MS. PETERSEN:
6 Q. So within Joint Exhibit 1, Exhibit F, where
7 in that document does it indicate that you have resigned
8 from the Board?
9 A. (Witness reviewed document.)
10 I believe there is a statement in here that
11 says that we would comply with the requests in the Charter.
12 It says -- let's see -- Therefore, the School is prepared,
13 albeit under duress, to sign the Charter Agreement as
14 proposed in your letter.
15 So I took that statement to mean, yes, we
16 agree to the things that you proposed. So it was, in my
17 understanding, that that sentence had communicated that we
18 were on board with that, and we then did faithfully do it.
19 Q. So you would agree with me then that your
20 resignation is not explicitly set forth in this letter;
21 correct?
22 A. In those words, no.
23 Q. Your name is not actually mentioned in this
24 letter, other than being copied on it; correct?
25 A. Correct.

157

1 Q. Are the names of any other Board member of
2 the I-LEAD Charter School represented in this letter?
3 A. No.
4 Q. Does this letter indicate to me, to Allison
5 Petersen, that there were any other changes in the Board
6 composition?
7 A. No. With the exception, again, of saying
8 that we agreed to what you requested, and you had requested
9 that. So other than saying we agree to what you requested,
10 no.
11 Q. When you say what we requested, you're
12 referencing the terms that were in that June, 2015 letter?
13 A. Yes. Correct.
14 Q. So then let's get some clarity regarding who
15 is on the Charter School Board at this point in time.
16 A. Sure.
17 Q. And in the hopes of doing this in a
18 streamlined way -- bear with me -- I'm going to ask you to
19 turn to Joint Exhibit 25.
20 A. Okay.
21 (Witness complies.)
22 Q. Are you there, sir?
23 A. Yes, I am.
24 Q. Do you see the letter that's included in
25 Joint Exhibit 25?

158

1 A. Yes.
2 Q. You would agree with me that this is a
3 letter from Mr. Angel Figueroa, the CEO of I-LEAD Charter
4 School?
5 A. Correct.
6 Q. And this letter is sent to Mr. Celmer,
7 C-E-L-M-E-R, from Reading School District?
8 A. Correct.
9 Q. And it's dated February 26, 2015; correct?
10 A. Yes. Correct.
11 Q. The letter states, quote, Enclosed you will
12 find the documents you have requested from the I-LEAD
13 Charter School, end quote. Do you see that?
14 A. Yes.
15 Q. And then it goes on to reference a Table of
16 Contents?
17 A. Yes.
18 Q. And if you turn to Page 3, do you see the
19 Table of Contents that's included with the letter?
20 A. Yes, I do.
21 Q. If you go down to Item No. 4, you'll see
22 that it says, quote, Current members of the Board of
23 Trustees and ILCs Administration. Do you see that?
24 A. Yes, I do.
25 Q. So now I'm going to ask you to turn to Joint

159

1 Exhibit 29, please.
2 A. (Witness complies.)
3 Yes.
4 Q. And this document is entitled I-LEAD Charter
5 School Board Members and Administration. Do you see that?
6 A. Yes.
7 Q. And there's five Board members listed on
8 this page.
9 A. Right.
10 Q. Can you read their names into the record,
11 please?
12 A. Robert Natalini, Chair, Philip Thomas,
13 Treasurer, Denise Kirkland, Secretary, David Castro, Robert
14 Jefferson.
15 Q. So as of February, 2015, you were still on
16 the Board in a role as simply a Board member; correct?
17 A. Correct.
18 Q. And Mr. Natalini was the Chair?
19 A. Yes, that's correct.
20 Q. So in terms of the folks who are identified
21 in Joint Exhibit 29, do any of them currently serve on the
22 Board of Trustees of the I-LEAD Charter School?
23 A. Me. I do. I'm a member -- no, of the
24 I-LEAD Charter School?
25 Q. Correct.

160

1 A. Of the I-LEAD Charter School, currently,
2 the only ones that remain are Robert Natalini and Robert
3 Jefferson.
4 Q. So Mr. Thomas, Ms. Kirkland and yourself
5 have all resigned?
6 A. Correct.
7 Q. When did each of those other folks resign?
8 A. In June following your letter and Counsel
9 O'Donnell's representation that we would comply.
10 Q. So in terms of communicating that
11 information to the School District, other than the sentence
12 that you pointed out in Mr. O'Donnell's June, 2015 letter,
13 are you aware of any other means by which that information
14 about those three resignations was communicated to the
15 School District?
16 A. I am not, but I do believe that it's common
17 knowledge. I mean, we have open Board meetings, and it's
18 clear to everybody who is there, and it's also reflected, I
19 think, on the websites of the School and whatnot. I think
20 it's reflected on our publicly available information.
21 Q. Are you certain that the Charter School
22 publishes the names of its Board members on the website?
23 A. I -- no, I'm not certain sitting here right
24 now. I'm not. But I do believe that it's not a secret
25 who's on the Board.

161

1 Q. In terms of Mr. Natalini's service on the
2 Board, is he the Board Chair currently?
3 A. Yes, he is.
4 Q. So he has not changed in that role since
5 February of 2015?
6 A. He has not.
7 Q. Who else serves on the Charter School's
8 Board at the moment?
9 A. I believe Dr. Amprey, Joe Amprey. I'm not
10 confident of the spelling of his.
11 MR. STACEY: A-M-P-R-E-Y.
12 THE WITNESS: A-M-P-R-E-Y. Okay.
13 BY MS. PETERSEN:
14 Q. Anyone else?
15 A. I don't believe there's anyone else at this
16 time.
17 Q. So is it correct then, sir, that there are
18 currently three Board members sitting on the I-LEAD Charter
19 School Board?
20 A. Correct.
21 Q. Has any other person sat on the Board
22 between June, 2015, and the current time?
23 A. Ex officio Dr. Sanchez was a member of the
24 Board, ex officio when he was head of the School.
25 Q. He has not worked for the School since the

162

1 '13/14 School year; correct?
2 A. I'm sorry. I'm sorry. I lost track of the
3 dates. I thought you were asking me throughout the entire
4 time frame. But in that -- what's the time frame again?
5 Q. June, 2015, to the present?
6 A. June, 2015, to the present, no, I believe
7 that's correct. Those are the only Board members.
8 Q. And Mr. Natalini, does he serve on I-LEAD,
9 Inc.'s Board?
10 A. He does not.
11 Q. Has he ever?
12 A. Yes, he has in the past, but he resigned
13 from the I-LEAD, Inc., Board when he joined the I-LEAD
14 Charter School Board in its inception. So he has never
15 simultaneously served on both Boards.
16 Q. Does Mr. Natalini perform work for I-LEAD,
17 Inc.?
18 A. No.
19 Q. And he has never performed work for I-LEAD,
20 Inc.?
21 A. No.
22 Q. He has never served as an adjunct faculty
23 member?
24 A. Not for I-LEAD, Inc.
25 Q. Where has he served as an adjunct faculty

163

1 member?
2 A. He has worked as an adjunct faculty member
3 for Harcum College, and he works also as an adjunct faculty
4 member for the University of Pennsylvania.
5 Q. Prior to Mr. Thomas and Ms. Kirkland
6 resigning from the Board, would you agree with me that
7 those two individuals served both as Board members for the
8 Charter School and also had a role at the I-LEAD, Inc.?
9 A. Correct. Yes. Yes.
10 Q. And Ms. Kirkland was the Vice-President of
11 Operations for the Inc.?
12 A. Correct.
13 Q. And she still serves in that role?
14 A. Yes.
15 Q. And Mr. Thomas, he also had a role at
16 I-LEAD, Inc.?
17 A. Yes.
18 Q. As Vice-President of Higher Education
19 Programs?
20 A. Yes.
21 Q. And does he still serve in that role?
22 A. Yes, he does.
23 Q. So I want to make sure I totally understand
24 your testimony. Your testimony today is that Mr. Natalini
25 does not perform any work for I-LEAD, Inc.?

164

1 A. No, he does not.
2 Q. And does not provide any service to I-LEAD,
3 Inc.?
4 A. No, he does not. He doesn't get paid.
5 MR. STACEY: May I interject? I think
6 it's Dr. Natalini. I haven't interjected with that, but
7 I do think that's --
8 MS. PETERSEN: I mean no disrespect.
9 We'll refer to him as Dr. Natalini then.
10 MR. STACEY: The other part of it is we
11 will be calling Dr. Natalini himself, so if his testimony
12 is going to be allowed, Dr. Natalini, we can ask the
13 questions of him directly.
14 MS. PETERSEN: Thank you for letting me
15 know that. Okay.
16 BY MS. PETERSEN:
17 Q. Mr. Castro; correct?
18 A. Yeah, no problem.
19 Q. You had disclosed earlier that you have a
20 law degree; correct?
21 A. Yes.
22 Q. What is your other educational background?
23 A. I'm an English major. I went to Haverford
24 College, and then I went to the University of Pennsylvania
25 Law School, and that's it.

165

1 Q. Do you hold any certifications in
2 Pennsylvania?
3 A. No, I do not.
4 Q. So I want to ask you some questions
5 regarding the application, Charter application.
6 A. Yes.
7 Q. So in terms of the revised application, this
8 was after the Charter -- the original application was
9 denied, you filed the revised application, and we've
10 already identified when that was filed; correct?
11 A. Yes.
12 Q. And Mr. Stacey had you read into the
13 record -- and I'll have you turn to Joint Exhibit 5.
14 A. (Witness complies.)
15 Q. Mr. Stacey had you read into the record the
16 paragraph on Page 1 under numbered Paragraph 1. Do you
17 recall reading that?
18 A. Yes, I do.
19 Q. And the last sentence of that paragraph
20 says, quote, The founding coalition recognizes that these
21 students may have dropped from the District's rolls as
22 early as the 9th or 10th grade, end quote. Do you see
23 that?
24 A. Yes, I do.
25 Q. So when this application was filed, would

166

1 you agree with me that the applicant went into this
2 endeavor knowing that students would potentially enroll in
3 the Charter School having not completed 9th or 10th grade?
4 A. I can tell you honestly that was a subject
5 of discussion as to how we would manage that. We knew that
6 the District was concerned about it, but we, I don't think,
7 had a plan to manage it effectively.
8 Our vision of the School was to admit
9 students that had completed the 9th and 10th grade. There
10 was the possibility, we thought, dealing with 17-year-olds
11 who didn't have a legal obligation to attend School, that
12 some of them would not have a complete transcript for 9th
13 or 10th grade. In other words, they wouldn't have quite
14 enough credits.
15 So we had a debate about whether it would
16 be possible to admit somebody as an 11th grader and engage
17 in some kind of credit recovery, and that was where it was
18 left. We only presented in the application enrollment
19 projections for the 11th and 12th grade, and we only
20 presented curriculum for the 11th and 12th grade.
21 So sitting here today, I would confess that
22 we did not have a complete plan for that eventuality, but
23 we were willing to acknowledge that it was something that
24 we needed to think about.
25 Q. So you would agree that you knew going into

167

<p>1 this that, even for the students that the application</p> <p>2 itself indicated were being targeted, you hadn't yet</p> <p>3 determined -- you meaning the Applicant -- hadn't yet</p> <p>4 determined how you were going to figure out all those</p> <p>5 nuances with the credit recovery piece of it for the kids</p> <p>6 that were going to enroll who might not have been in 9th or</p> <p>7 10th grade?</p> <p>8 A. To be honest, yes. And I can tell you that</p> <p>9 our Team was divided on it. I think there were part of our</p> <p>10 Team that -- part of our team was saying, we're just not</p> <p>11 going to be able to admit somebody unless they have all</p> <p>12 those credits. So in other words, we thought one theory</p> <p>13 was there's a possibility to say, listen, we're only</p> <p>14 offering the 11th and 12th grade, so if you don't have</p> <p>15 those credits, even though you're a dropout, you can't come</p> <p>16 here.</p> <p>17 And then there were some people -- so we</p> <p>18 acknowledge that it's possible that there's a dropout who</p> <p>19 doesn't have 9th and 10th grade. So the way that I read</p> <p>20 this is not necessarily to say that we're going to admit</p> <p>21 those people, but rather that it's possible that there will</p> <p>22 be some dropouts that we may not be able to serve because</p> <p>23 they don't have those credits. Do you see what I'm saying?</p> <p>24 Q. But that wasn't expressly stated in the</p> <p>25 revised application?</p> <p>168</p>	<p>1 A. Yes.</p> <p>2 Q. -- where it says, quote, Baseline,</p> <p>3 semi-colon, 2007-2008 PSSA scores published on the Reading</p> <p>4 School District website?</p> <p>5 A. Yes.</p> <p>6 Q. You would agree with me that in a high</p> <p>7 school setting, the only tested grade on the PSSA is 11th</p> <p>8 grade; correct?</p> <p>9 A. I don't know. I don't know what -- I</p> <p>10 honestly don't know the answer to that question.</p> <p>11 Q. Do you, sitting here today, know that there</p> <p>12 are other tested grades on the PSSA in high school?</p> <p>13 A. I don't know. To tell you the truth, I</p> <p>14 don't know.</p> <p>15 Q. So if you don't know, how can you now say</p> <p>16 that the only baseline data that would be collected is 11th</p> <p>17 grade?</p> <p>18 A. No, no. What I'm saying is that we only</p> <p>19 presented this baseline information about 11th grade, which</p> <p>20 to me reflects -- it reflects our mindset that we were only</p> <p>21 interested in what the students were coming in -- what the</p> <p>22 comparison would be at 11th grade when they entered as 11th</p> <p>23 grade students, what the baseline data would be.</p> <p>24 Q. You were --</p> <p>25 A. Not that that was the only -- there may be</p> <p>170</p>
<p>1 A. I agree that it could be read in several</p> <p>2 different ways. So I agree that it was an ambiguity in the</p> <p>3 application.</p> <p>4 Q. Where in the application does it say that</p> <p>5 you were going to be offering a two-year program?</p> <p>6 A. Well, if you read the application, you'll</p> <p>7 see that we only made projections for 11th and 12th grade.</p> <p>8 We only made projected enrollments of 11th and 12th grade.</p> <p>9 And then we only made academic goals and objectives for the</p> <p>10 12th grade. We only set baseline data for the 11th grade.</p> <p>11 So if we were expecting to admit students</p> <p>12 that were in the 9th or 10th grade, we would have had</p> <p>13 projections, enrollments, baseline data and goals and</p> <p>14 objectives for those grades, but we didn't have that.</p> <p>15 Q. You didn't have any goals or objectives for</p> <p>16 11th graders, either?</p> <p>17 A. No, but we acknowledged that we would</p> <p>18 collect baseline data. So, in other words, if you see we</p> <p>19 were saying that we're going to collect baseline data on</p> <p>20 the 11th grade, so we were aware that --</p> <p>21 Q. Where do I see that?</p> <p>22 A. You would see that in Academic Goal 1</p> <p>23 Baseline. So we were showing baseline data for 11th grade</p> <p>24 mathematics and reading.</p> <p>25 Q. So you're talking about on Page 5 --</p> <p>169</p>	<p>1 other tests. I don't know.</p> <p>2 Q. You were anticipating that kids may come in</p> <p>3 having never been in 11th grade at Reading Senior High</p> <p>4 School; right?</p> <p>5 A. I don't think that's accurate. To be fair,</p> <p>6 I don't think that's accurate. What we were acknowledging,</p> <p>7 what we acknowledge in the letter, was that it was possible</p> <p>8 that someone could be a dropout and not have completed the</p> <p>9 9th and 10th grade. Whether we were going to admit them or</p> <p>10 not, to be honest, we were having a debate about that. We</p> <p>11 were not entirely clear how that was going to work.</p> <p>12 Part of our Team said we can't do that</p> <p>13 because we're only offering a two-year school. We only</p> <p>14 have two years to work with these students. And part of</p> <p>15 our Team was advocating a credit recapture model.</p> <p>16 So if somebody comes in -- what if someone</p> <p>17 comes in with a year and a half, what if they come in</p> <p>18 almost having completed the 10th grade, could we then give</p> <p>19 them some credit recap -- recovery. And we didn't have --</p> <p>20 we weren't entirely clear about that.</p> <p>21 And it became more confusing, to tell you</p> <p>22 the truth, as we were in dialogue with the Board members</p> <p>23 after submitting the revised application because the Board</p> <p>24 members were telling us that there were a very large number</p> <p>25 of dropouts who were in the 9th and 10th grade, a large</p> <p>171</p>

<p>1 number of dropouts and truants who were less than 17 years 2 old.</p> <p>3 So they were kind of taking our proposal, 4 if you will, and poking it full of holes, basically saying 5 like, we don't think this is going to work.</p> <p>6 Q. At any point in time did the Applicant 7 withdraw its revised application?</p> <p>8 A. Not to my knowledge, no.</p> <p>9 Q. You indicated that the School Board granted 10 a Charter. And we'll talk a little bit about the 11 Resolution that they adopted.</p> <p>12 A. Right.</p> <p>13 Q. And then a Charter document was issued.</p> <p>14 A. Right.</p> <p>15 Q. It was signed by you; correct?</p> <p>16 A. Yes.</p> <p>17 Q. At any point in time did you say to the 18 School District, hey, you're handing us this Charter 19 Agreement, it doesn't adequately and accurately reflect 20 what we're going to do, we can't agree to this?</p> <p>21 A. I think that we were very concerned about 22 it. And one of the ways that we were concerned about it 23 initially was to frame that two-page document to kind of 24 say, listen, this is what we think still applies, you know, 25 this is what we think that we still have a shared vision</p> <p style="text-align: right;">172</p>	<p>1 identified as the Resolution that the Board adopted on 2 October 27, 2010, granting the Charter; correct?</p> <p>3 A. Correct.</p> <p>4 Q. And at the time this was granted, you would 5 agree with me that the name of the Charter School was 6 Reading Leadership Institute Charter School?</p> <p>7 A. Yes.</p> <p>8 Q. And in terms of the conditions and 9 requirements that are referenced in this document, you had 10 previously pointed out Paragraph 10 where it says, I-LEAD 11 student body will reflect Grades 9 to 12?</p> <p>12 A. Yes.</p> <p>13 Q. This document and Resolution does not 14 indicate an age range for your students; correct?</p> <p>15 A. It doesn't contain an age limitation.</p> <p>16 Q. And it doesn't say anything about students 17 as dropouts or not dropouts or anything to that regard; 18 correct?</p> <p>19 A. (Witness reviewed document.) 20 Correct. Correct.</p> <p>21 Q. And you then testified that subsequent to 22 the Resolution, a Charter Agreement was developed?</p> <p>23 A. Correct.</p> <p>24 Q. And that's Joint Exhibit 7; correct?</p> <p>25 A. Yes.</p> <p style="text-align: right;">174</p>
<p>1 about.</p> <p>2 And so we wanted -- and I was very 3 concerned with our lawyers about referencing the 4 application in its entirety because I didn't think that 5 would be coherent. It didn't make sense any more to do 6 that.</p> <p>7 So I remember that I was very concerned 8 about that issue. And we were in dialogue with the Board 9 members. It was my -- we had obviously never created a 10 Charter School before, and we didn't understand what the 11 legal standards were for generating a Charter. So we 12 didn't know what should go in, how detailed it should be. 13 We were relying on our Counsel, and our Counsel -- we 14 relied on our Counsel to say, do what's required to get us 15 through this next step. And that was the spirit in which 16 that Charter was framed.</p> <p>17 So we were essentially in a dialog with our 18 Counsel about how to make sure that we sign something that 19 is not inconsistent with the nature of the institution that 20 we think that the District wants us to create.</p> <p>21 Q. Mr. Castro, who was your Counsel at the 22 time?</p> <p>23 A. Bob O'Donnell.</p> <p>24 Q. So in terms of -- let's look at Joint 25 Exhibit 6, please. So Joint Exhibit 6 you previously</p> <p style="text-align: right;">173</p>	<p>1 Q. And Joint Exhibit 7 is signed by you?</p> <p>2 A. Yes.</p> <p>3 Q. And signed by Yvonne Stroman, I believe, as 4 the Board President of the Reading School District?</p> <p>5 A. Yes.</p> <p>6 Q. Was this agreement approved by the Board of 7 School Directors by the Reading School District?</p> <p>8 A. Yes.</p> <p>9 Q. Was this agreement approved by the Board of 10 Trustees of the Charter School?</p> <p>11 A. Yes.</p> <p>12 Q. Do you think it would have been important to 13 find out if the Board of School Directors approved this 14 document?</p> <p>15 A. I don't know the answer to that question. 16 At the time, I thought that it was consistent with the 17 Resolution and the conversation that we had had with the 18 Board. At the time, I felt that it was consistent. And I 19 did not understand at the time what the Board's process was 20 for making documents like this.</p> <p>21 So I assumed that their Counsel did what 22 was legally required to make the Charter complete and 23 legally sufficient.</p> <p>24 Q. You assumed that, but you didn't verify it; 25 correct?</p> <p style="text-align: right;">175</p>

1 A. No. I didn't verify it independently other
2 than asking my own lawyer if he thought it was sufficient,
3 and he said he did.

4 Q. And if you look at Paragraph 5, you would
5 agree with me that the Charter Agreement indicates that,
6 quote, The District reserves its right to set in motion the
7 revocation of the Charter in accordance with the Charter
8 School Law, Section 17-1729-A?

9 A. I didn't understand that provision at the
10 time. It seemed to me to be just repeating what was in the
11 statute.

12 Q. Did you ask your lawyer what that meant?

13 A. He didn't understand it either, to my
14 recollection.

15 Q. And yet you still signed the Charter?

16 A. Yes. I mean, we didn't feel that there was
17 any need to quibble with it because, essentially, it was
18 restating exactly what was in the statute.

19 Q. And in Paragraph 10 you see it says, quote,
20 The Charter School will provide education for Grades 9
21 through 12, but will give preference in enrollment to
22 dropout students consistent with the application, end
23 quote. Do you see that?

24 A. Yes.

25 Q. You would agree with me that that statement

176

1 is inconsistent with the statement that's in Joint
2 Exhibit 6, Paragraph 10, in the Board Resolution?

3 A. It's -- it amplifies that statement. Yes.

4 Q. But it is not word-for-word consistent with
5 it; correct?

6 A. Correct.

7 Q. The language relative to dropout is not in
8 the Board Resolution?

9 A. Correct.

10 Q. And in Paragraph 11 in Joint Exhibit 7 it
11 states, quote, The Charter School will observe the
12 provisions of the I-LEAD Charter Application which are
13 attached hereto and made part of this Charter Agreement.
14 Do you see that?

15 A. Yes.

16 Q. And I believe you testified earlier that it
17 was your understanding that what was being referenced in
18 that Paragraph 11 was not the totality of the revised
19 application. Is that correct?

20 A. That's correct.

21 Q. And tell me again why you thought that was
22 the case.

23 A. I thought that was the case because I was
24 very concerned about that, and I queried our lawyer about
25 it specifically. And I participated in drafting the

177

1 attachment that was attached, so I wrote the attachment
2 that was to be attached, the one that had been referenced.
3 So it's very clear in my recollection that that's what it
4 was.

5 Q. And the attachment that you claim was
6 attached is the document that you identified in Charter
7 School Exhibit No. 1; correct?

8 A. (Witness reviewed document.)

9 Let me make sure I know what you're
10 referring to. Charter School Exhibit No. 1. Yes.

11 Q. You said you prepared this document?

12 A. Correct.

13 Q. When was it prepared?

14 A. It was prepared in December of 2010 during
15 the time period that we were preparing the Charter itself.

16 Q. So this document was prepared after the
17 revised application had already been submitted and had
18 already been granted by the School District?

19 A. I have trouble with the idea that they
20 granted the application, to tell you the truth. I think
21 they modified the application, but it was after they took
22 that vote. Yes.

23 Q. Let me rephrase my question. I don't want
24 to squabble with you. Charter School Exhibit No. 1 was
25 prepared after the revised application had been submitted

178

1 and after the School Board approved Resolution --

2 A. Correct.

3 Q. -- whatever number it is on October 27,
4 2010; correct?

5 A. Correct.

6 Q. Was Charter School 1 provided to the full
7 Reading School District Board?

8 A. I don't know.

9 Q. You don't know if this document was ever
10 approved then by the Board?

11 A. I don't know.

12 Q. If you had concerns about the October 27,
13 2010 Resolution that was passed by the Board --

14 A. Right.

15 Q. -- why didn't you withdraw the application?

16 A. I didn't really even know that was an
17 option at this point. We were working toward creating a
18 school and we wanted to move forward with it, and we
19 thought that the best way to do that would be to just
20 collaborate with the Board members and the District as much
21 as possible.

22 And I didn't perceive that further legal
23 proceedings in front of the Board would be useful to
24 getting there. We had been in a -- more than a year-long
25 process, and we wanted to see us move towards figuring out

179

1 how to work together.
2 And so it was our hope that we would
3 address these issues through our collaborative work that
4 would take place as we created the school.
5 Q. When you were testifying about Joint
6 Exhibit 7 previously, your Counsel had pointed you to
7 Paragraph 1 --
8 A. Joint Exhibit 7, yes.
9 Q. -- relative to the various different
10 employment classifications that were reflected in, I
11 believe, both the Resolution and the Charter Agreement. Do
12 you see that?
13 A. Yes.
14 Q. And there's a specific number of students
15 identified in Paragraph 1 (d). Do you see that?
16 A. Yes.
17 Q. It says 150 students in Year 1 and 300
18 students in Year 2. Did the Charter School enroll more
19 than 150 students in Year 1?
20 A. I believe we did.
21 Q. Did the Charter School enroll more than 300
22 students in Year 2?
23 A. Yes, I believe we did, but I'm not certain
24 about the numbers. I haven't looked at the numbers to know
25 exactly how many were enrolled.

180

1 But, again, I viewed that as a request to
2 provide budget items to show that we were serious about
3 doing that and not as a limitation on the operation. If
4 you were going to limit the enrollment, I believe they
5 would have just put in a provision that limited the
6 enrollment.
7 Q. So you didn't view that as any sort of
8 limitation on your enrollment?
9 A. No. No, not at all.
10 Q. Did you ask your legal Counsel about that?
11 A. Yeah, legal Counsel had -- because one of
12 the things that we were very surprised, to tell you the
13 truth, that no cap was negotiated in the agreement. We
14 certainly didn't feel that we would want to propose a cap
15 ourselves unilaterally, but no cap was requested.
16 And it was described to me that the Charter
17 School Law required limitations on enrollment to be placed
18 in the Charter Agreement itself, and so we just let it be
19 the way it was.
20 Q. So if you could turn to Page 3 of Charter
21 School Exhibit No. 7.
22 A. (Witness reviewed document.)
23 The Addendum?
24 Q. This is the Addendum. Correct.
25 A. Yes.

181

1 Q. Right.
2 A. Correct.
3 Q. So this Addendum is signed by you and by Ms.
4 Stroman in June of 2011; correct?
5 A. Correct.
6 Q. So now this is approximately six months
7 after the initial Charter Agreement was signed.
8 A. Yes.
9 Q. Do you know if this Addendum was ever Board
10 approved by the School District?
11 A. I don't know.
12 Q. And this Addendum, is it fair to say, only
13 deals with the opening date of the Charter School in terms
14 of the term of the actual Charter?
15 A. I believe that the way it was described to
16 me is that it was not just the opening date, but the term
17 that they felt that the Charter needed to have explicit
18 language about the term as well as the opening date. And
19 that's why both of those things are in there, so...
20 Q. Was any information added to the Addendum
21 regarding the proposed location of the Charter School?
22 A. Not to my knowledge.
23 Q. Why not, if that was a concern?
24 A. It wasn't a concern at the time. At the
25 time that we -- at the time that we did the original

182

1 Charter Agreement and we that did the Addendum, there were
2 no concerns expressed to us about the location.
3 Q. It was only after the fact?
4 A. Yes.
5 Q. So you were going to open approximately
6 three months after the Addendum was created. At what point
7 in time did concerns about the location arise?
8 A. My recollection is that in the summer, at
9 some point in close proximity to our start date, Counsel
10 for the District raised questions about the environmental
11 quality of the 200 North 8th Street location. And that was
12 the first time that we had a question about the location.
13 Q. If there were concerns about who you would
14 be educating, that's not addressed in the Addendum either;
15 correct?
16 A. Correct.
17 Q. Was there a specific reason that the Charter
18 School didn't pursue an Addendum with the School District
19 to the Charter Agreement to more accurately reflect the
20 issues and concerns that you had at that time?
21 A. I think that we -- I didn't feel that we
22 were -- I felt that we understood -- I think our Team felt
23 that we understood what the District wanted, but we knew
24 that it was not consistent with what was in the
25 application, and we knew that it was not spelled out in the

183

1 Charter.

2 So I wouldn't say that at that point we

3 knew there was a controversy, but we knew that what was in

4 the Charter was not consistent with our application. And

5 we also knew that it was not spelled out in great detail in

6 the Charter. We knew that.

7 So I don't think that it would be -- we

8 didn't have actual -- any actual concerns or conflict with

9 the Board members or the District at this point. We were

10 just going about our business, bringing up the School, and

11 I don't -- I believe the first time that we had any actual

12 questions raised about the enrollment it was not until the

13 spring of 2012.

14 Q. And who raised those questions and concerns?

15 A. I don't remember, to tell you the truth,

16 but I remember being approached by one or more of the Board

17 members with questions along the lines of the ones that

18 we've been discussing about what was stated in the

19 application versus what was stated in the Charter and

20 concerns being raised about our service to children that

21 were less than 17 years old.

22 Q. So those concerns were raised with you

23 starting in the '12/13 school year?

24 A. I would say they were raised in the spring

25 of 2012, to the best of my recollection.

184

1 Q. So at the end of the '11/12 school year?

2 A. Yes, exactly. Exactly.

3 Q. Do you remember specifically who raised

4 those concerns?

5 A. I don't remember, to tell you the truth. I

6 don't remember -- I remember that what happened afterwards

7 was a series of intensive meetings and conversations in

8 which we had discussions much like those discussions that

9 we're having now, and then it all went away.

10 Q. Was Dr. -- do you know the name Drew Miles?

11 A. Yes, I remember Drew Miles. Yes.

12 Q. He was Superintendent of the School District

13 for a period of time?

14 A. That's correct. And I think some of those

15 meetings -- he participated in some of those meetings, to

16 my recollection. Yes.

17 Q. And Dr. Miles was raising concerns about who

18 the Charter School was enrolling?

19 A. I believe that's correct. Yes. I believe

20 him and Board members were asking questions about it.

21 Q. Bear with me a minute, please.

22 A. Sure.

23 Q. You had also testified, I believe, that --

24 Mr. Castro, you would agree with me that after the School

25 Board renewed the Charter in October of 2013, a renewal

185

1 Charter was not adopted by either Board, the Board of

2 Trustees of the Charter School or the Board of Directors of

3 the School District?

4 A. It was my understanding at the time that

5 they had just simply renewed the Charter that existed

6 before. So that was the renewal Charter, in essence, that

7 they had just given a resolution. This is how it was

8 explained to me, that they could do this. In essence, they

9 could pass a resolution just extending the life of that

10 Charter, and that's what they had elected to do.

11 Q. And a document called a Charter has never

12 been approved by either Board; correct? Reflective of the

13 renewal?

14 A. I don't agree with that. I think that my

15 impression of it is that the Charter -- that we are still

16 operating under the Charter that was renewed. So in other

17 words, that the Board's Resolution essentially operated as

18 a renewal of that Charter.

19 Q. So your understanding is that you're

20 operating under the 2011 Charter?

21 A. Correct.

22 Q. So that is what we've previously identified

23 as Joint Exhibit 7.

24 A. Yes.

25 Q. And with the Addendum attached to it?

186

1 A. Yes, with the -- well, with -- except for

2 the Resolution would have affected the term.

3 Q. So that being the only change --

4 A. Yes.

5 Q. -- related to the Charter Agreement?

6 A. Correct.

7 Q. Fair enough. And in terms of that Charter

8 Agreement, you would agree with me that it does not

9 indicate a location for the Charter School; correct?

10 A. That's correct. It does not. Yes.

11 Q. It doesn't limit you to a location; correct?

12 A. Right.

13 Q. Or prohibit you from operating out of

14 another location; correct?

15 A. Correct. Correct. Which is why we were

16 not overly worried about the move to 401 Penn Street

17 because we felt that the Charter allowed us to make that

18 move.

19 Q. You would agree with me that the School

20 District has not taken steps in the revocation proceedings

21 to say or to raise as one of the charges the fact that

22 you're operating out of 401 Penn Street; correct?

23 A. To my understanding, that's correct. Yes.

24 Q. So that's not one of the charges that you're

25 violating the Charter, for example, by operating out of

187

<p>1 that location?</p> <p>2 A. Correct.</p> <p>3 Q. Has the School District ever sent the</p> <p>4 Charter School a communication indicating that you could</p> <p>5 not operate out of 401 Penn Street?</p> <p>6 A. The School District has asked us questions</p> <p>7 about 401 Penn Street that we have responded to. We also</p> <p>8 arranged for the District to tour 401 Penn Street and go</p> <p>9 through it, and I believe there was conversations with the</p> <p>10 leadership of the District in which we -- they asked us</p> <p>11 questions about the permitting process and the approval</p> <p>12 processes for the qualification of the facility as a</p> <p>13 school.</p> <p>14 And then, of course, we have the zoning</p> <p>15 conflict which came up later on that the School</p> <p>16 participated in. So with the exception of the zoning</p> <p>17 matter, other than that, no.</p> <p>18 Q. The School District hasn't put in writing to</p> <p>19 you saying you're not allowed to operate out of 401 Penn</p> <p>20 Street?</p> <p>21 A. Right. Correct.</p> <p>22 Q. If you recall testifying about Joint</p> <p>23 Exhibit 2 and the draft Charter that was attached to that,</p> <p>24 you would agree with me that the draft Charter reflects the</p> <p>25 location of the Charter School on Page 1 as being 401 Penn</p> <p style="text-align: right;">188</p>	<p>1 say that we did not agree with all of them, or we did not</p> <p>2 agree -- we certainly at no point said, yes, as it is</p> <p>3 stated here we agree, but we were, I think, in an ongoing</p> <p>4 conversation about agreeing to parts of it.</p> <p>5 So it wouldn't be correct to say that we</p> <p>6 declined it en masse.</p> <p>7 Q. There were negotiations going on?</p> <p>8 A. Yes.</p> <p>9 Q. And those negotiations went on for some</p> <p>10 period of time; correct?</p> <p>11 A. Yes, they did.</p> <p>12 Q. Over a year; correct?</p> <p>13 A. Yes.</p> <p>14 Q. And the negotiations were still ongoing as</p> <p>15 of June, 2015; correct?</p> <p>16 A. I think it would be fair to say that there</p> <p>17 were periods of negotiation, and then there were periods at</p> <p>18 which the negotiations lapsed, and we were under the belief</p> <p>19 for certain periods that the District had dropped the</p> <p>20 matter completely.</p> <p>21 So there was a period -- actually, to my</p> <p>22 recollection, what happened is after the August 14th</p> <p>23 letter, there were a series of meetings with the District,</p> <p>24 and then the matter was dropped, in essence. Nothing</p> <p>25 happened for a period of months.</p> <p style="text-align: right;">190</p>
<p>1 Street; correct?</p> <p>2 A. This is Joint Exhibit 2. Yes. That's</p> <p>3 correct.</p> <p>4 Q. In Paragraph 2, do you see that?</p> <p>5 A. Yes.</p> <p>6 Q. You would agree with me that the Charter</p> <p>7 that's contained in Joint Exhibit 2 has never been adopted</p> <p>8 by either Board?</p> <p>9 A. Correct.</p> <p>10 Q. And you would agree with me that the terms</p> <p>11 outlined in the letter that's attached as Joint Exhibit 3</p> <p>12 have not been reduced to a Charter Agreement; correct?</p> <p>13 A. That's correct.</p> <p>14 Q. And those terms have not ever been adopted</p> <p>15 by the Reading School District Board of School Directors,</p> <p>16 to your knowledge?</p> <p>17 A. To the best of my knowledge, they have not.</p> <p>18 Q. If you'd turn back to Joint Exhibit 2, this</p> <p>19 would have been the August, 2014 letter. You would agree</p> <p>20 with me that the Charter School did not agree with the</p> <p>21 terms and conditions that were outlined both in the letter</p> <p>22 and in the draft Charter that's attached to Joint</p> <p>23 Exhibit 2; correct?</p> <p>24 A. I can't say that we did not agree. I think</p> <p>25 we were in the process of negotiating those terms. I would</p> <p style="text-align: right;">189</p>	<p>1 Q. So I just want to make sure our language is</p> <p>2 clear. As an attorney, you know how important that is, I'm</p> <p>3 sure.</p> <p>4 A. Yes.</p> <p>5 Q. In terms of you saying the issue was</p> <p>6 dropped, you're simply saying that you didn't hear from the</p> <p>7 District for a period of time?</p> <p>8 A. Correct. Correct, for a significant period</p> <p>9 of time. In other words, there were situations in which we</p> <p>10 had a meeting, we made a proposal, and then nothing</p> <p>11 happened for months.</p> <p>12 Q. Mr. Castro, you're spoke at length earlier</p> <p>13 regarding the goals of the Charter School, and your</p> <p>14 attorney had you identify the goals that were included in</p> <p>15 the revised application. Do you recall that?</p> <p>16 A. Yes.</p> <p>17 Q. At any point in time after the Charter was</p> <p>18 granted until the amendment request that we're now convened</p> <p>19 here today for, did the Charter School seek to adjust the</p> <p>20 goals in that revised application?</p> <p>21 A. I'm sorry, can you restate that because I'm</p> <p>22 not sure of the timeline?</p> <p>23 Q. At any time since the Charter was granted</p> <p>24 back in 2010 until the amendment request was submitted in</p> <p>25 September of 2015, did the Charter School seek to adjust</p> <p style="text-align: right;">191</p>

<p>1 the goals?</p> <p>2 A. Yes, I believe we did.</p> <p>3 Q. Did you file an amendment request?</p> <p>4 A. We did not file an amendment request, but</p> <p>5 we were involved in intensive negotiations with the Board</p> <p>6 and Board members, attempting to find an amicable solution</p> <p>7 that we could all agree to.</p> <p>8 Q. You and your Counsel have identified various</p> <p>9 communications that mainly have come from me, Allison</p> <p>10 Petersen, on behalf of the School District with the</p> <p>11 exception of the one letter from Mr. O'Donnell in June of</p> <p>12 2015.</p> <p>13 A. Sure.</p> <p>14 Q. Have you presented any other documents that</p> <p>15 reflect revised goals that the Charter School was seeking</p> <p>16 to have imposed within that time period?</p> <p>17 A. Yes, we have. We presented via e-mail and</p> <p>18 also in meetings proposed academic standards to Dr. Mumin,</p> <p>19 and I believe we also shared them with individual Board</p> <p>20 members.</p> <p>21 Q. Have you presented those in the exhibits</p> <p>22 that you've provided to us today?</p> <p>23 A. No, I don't think they've been requested.</p> <p>24 That material has not been requested.</p> <p>25 Q. You testified about the population of</p> <p style="text-align: right;">192</p>	<p>1 they're virtually a dropout even though they may not</p> <p>2 technically be a dropout.</p> <p>3 And then the third level would be students</p> <p>4 who are at risk of dropping out, which would be people who</p> <p>5 have been in school but are not accumulating credits or are</p> <p>6 experiencing extremely poor academic performance so that,</p> <p>7 perhaps, they're not progressing and -- or not learning</p> <p>8 while they're in school.</p> <p>9 And then I would add a final tranche to</p> <p>10 that which is students that are suffering with social</p> <p>11 issues that are highly likely to impede their academic</p> <p>12 engagement, which could be being adjudicated, being</p> <p>13 addicted, being homeless, being a victim of abuse, you</p> <p>14 know, being pregnant. The list goes on.</p> <p>15 Q. I'm sure it does.</p> <p>16 A. Yeah.</p> <p>17 Q. You would agree with me that not every child</p> <p>18 enrolled by the Charter School falls into one of those four</p> <p>19 categories?</p> <p>20 A. I actually don't agree with that. I think</p> <p>21 that we could say that the -- I would turn it around. I</p> <p>22 would say that there may be a small minority of students to</p> <p>23 which those categories do not apply, but I think that it</p> <p>24 is, in all likelihood, less than five percent of our</p> <p>25 population, and that the rest of the population would be</p> <p style="text-align: right;">194</p>
<p>1 students that the Charter School intended to serve and also</p> <p>2 is serving.</p> <p>3 A. Yes.</p> <p>4 Q. And you referenced the goals that were</p> <p>5 included in Charter School Exhibit 1, which is the request</p> <p>6 for the amendment, and we'll get there in a minute. But in</p> <p>7 terms of who the Charter School is enrolling, I think we</p> <p>8 need to be a little more specific about that.</p> <p>9 A. Sure.</p> <p>10 Q. So we have this concept of a dropout. How</p> <p>11 do you define dropout? How does the Charter School --</p> <p>12 excuse me -- define dropout?</p> <p>13 A. Well, I would say we define it in several</p> <p>14 layers. The first layer would be someone that's -- someone</p> <p>15 that is not in school, who's still at an age where they can</p> <p>16 be in school. So that would be somebody who's 17 and above</p> <p>17 and who is not in school even though they're entitled to go</p> <p>18 to School until they're 21 years old.</p> <p>19 So then it would be people that, perhaps,</p> <p>20 have had a substantial history of truancy. This would be</p> <p>21 the second tranche, so in other words, they may be actually</p> <p>22 located -- they may be theoretically on the books</p> <p>23 somewhere, but they're actually not attending school. So</p> <p>24 someone who's experiencing repeated episodes of truancy</p> <p>25 over a year, over the course of time, I would say that</p> <p style="text-align: right;">193</p>	<p>1 very appropriately described by those categories that I</p> <p>2 just mentioned, fall into at least one, if not multiple of</p> <p>3 them.</p> <p>4 Q. You would agree with me that those different</p> <p>5 categories are not reflective of the population that only</p> <p>6 I-LEAD serves?</p> <p>7 A. I think that this is an extremely</p> <p>8 challenging comparison to make. I think that there may be</p> <p>9 other institutions that also serve students that are like</p> <p>10 the students we serve, but then they may also serve</p> <p>11 students that are much more academically solid and socially</p> <p>12 solid than the students we serve.</p> <p>13 So it's really a question of the total</p> <p>14 extent of your population. I believe that we have a more</p> <p>15 concentrated population of at-risk than we would see in</p> <p>16 other schools.</p> <p>17 Q. So you're not suggesting that other schools</p> <p>18 don't have an at-risk population?</p> <p>19 A. Correct. I'm saying the concentration is</p> <p>20 less.</p> <p>21 Q. You're saying that your percentage is</p> <p>22 higher?</p> <p>23 A. Correct. Yes.</p> <p>24 Q. Have you ever done any work for Reading</p> <p>25 School District?</p> <p style="text-align: right;">195</p>

<p>1 A. Me personally, no.</p> <p>2 Q. Are you familiar with the population of</p> <p>3 students at Reading Senior High School?</p> <p>4 A. I am only familiar generally by reading</p> <p>5 data reports. I'm not intimately familiar with the</p> <p>6 population.</p> <p>7 Q. You're not in the High School?</p> <p>8 A. No.</p> <p>9 Q. Have you ever been to the High School?</p> <p>10 A. Yes, I have. I've been to the High School.</p> <p>11 Q. You're not there on a regular basis?</p> <p>12 A. No, I'm not.</p> <p>13 Q. And you haven't ever been employed by the</p> <p>14 Reading School District as a teacher or in any other</p> <p>15 capacity; correct?</p> <p>16 A. No.</p> <p>17 Q. Do you know how many students that are being</p> <p>18 educated at Reading Senior High School who have dropped</p> <p>19 out, as you've defined that term?</p> <p>20 A. I don't know.</p> <p>21 Q. Do you know how many students are at Reading</p> <p>22 High School who have a truancy problem?</p> <p>23 A. I don't know.</p> <p>24 Q. Do you know how many students are at Reading</p> <p>25 High School who are at risk of dropping out in the manner</p> <p style="text-align: right;">196</p>	<p>1 other schools is that it would be the total concentration</p> <p>2 of those students.</p> <p>3 We don't have the other part of the</p> <p>4 population that may be more gifted, that may be more solid</p> <p>5 economically, socially. That's the part that we're</p> <p>6 generally missing.</p> <p>7 Q. What is the Charter School's percentage of</p> <p>8 economically disadvantaged students?</p> <p>9 A. 99 -- 99 percent. Yeah.</p> <p>10 Q. Do you define at risk as being a member of a</p> <p>11 minority group?</p> <p>12 A. No, not necessarily. I mean, I don't think</p> <p>13 that's -- I wouldn't conflate those two ideas.</p> <p>14 Q. So simply because someone is Hispanic or</p> <p>15 African American, for example, does not automatically make</p> <p>16 them at risk, in your estimation?</p> <p>17 A. No.</p> <p>18 Q. Have you ever viewed transcripts of students</p> <p>19 enrolling in I-LEAD?</p> <p>20 A. I have -- no, I have not personally</p> <p>21 reviewed transcripts.</p> <p>22 Q. Of any student?</p> <p>23 A. No.</p> <p>24 Q. You had referenced about -- you mentioned</p> <p>25 gifted. Does the I-LEAD Charter School have any students</p> <p style="text-align: right;">198</p>
<p>1 you've described?</p> <p>2 A. A specific number, no, I don't know.</p> <p>3 Q. Do you know how many students at Reading</p> <p>4 High School have social issues of the kind that you</p> <p>5 described?</p> <p>6 A. No, I don't know.</p> <p>7 Q. You don't know how many kids -- how many</p> <p>8 female students at Reading High School are sitting in class</p> <p>9 pregnant at the time?</p> <p>10 A. No, I don't.</p> <p>11 Q. How many students are experiencing</p> <p>12 homelessness?</p> <p>13 A. I don't know.</p> <p>14 Q. Do you define at risk as being economically</p> <p>15 disadvantaged?</p> <p>16 A. I think that's part of it, but I think it's</p> <p>17 more than that.</p> <p>18 Q. There has to be some other factor, other</p> <p>19 than just being a low-income student?</p> <p>20 A. I think that being a low-income student at</p> <p>21 the level and concentration of poverty that we have almost</p> <p>22 always entails some set of those problems. So I think they</p> <p>23 co-occur. It's probably a decent barometer, but, again, I</p> <p>24 know the nature of the problems that we see in the School,</p> <p>25 and I think the main difference between our School and</p> <p style="text-align: right;">197</p>	<p>1 that have been identified as gifted?</p> <p>2 A. I believe we have a very small minority,</p> <p>3 but I don't know the exact number. No, I don't have that</p> <p>4 -- sitting here right now, I don't have that specific data.</p> <p>5 Q. Does the I-LEAD Charter School offer gifted</p> <p>6 programming to students?</p> <p>7 A. I don't know.</p> <p>8 Q. Does the I-LEAD Charter School offer</p> <p>9 advanced placement programming to students?</p> <p>10 A. I don't know.</p> <p>11 Q. You don't know one way or the other?</p> <p>12 A. Right. Right now I don't know.</p> <p>13 Q. Are you familiar with how many students --</p> <p>14 let's go year by year. So the first year being the '11/12</p> <p>15 school year, how many students enrolled in I-LEAD who had</p> <p>16 been dropped out, according to your definition?</p> <p>17 A. I don't have that -- I mean, I don't have</p> <p>18 specific data, and I think it would depend -- sitting here</p> <p>19 right now, in front of me I don't have knowledge of that.</p> <p>20 I know that we have information about that at the school,</p> <p>21 but I don't have that information in front of me right now</p> <p>22 to be able to answer that question.</p> <p>23 And I also think that, again, you have to</p> <p>24 -- I laid out like four different tranches there. So you</p> <p>25 have to be specific, which tranche are you talking about.</p> <p style="text-align: right;">199</p>

1 And -- but even if you were specific, I couldn't answer
2 that question because I don't have the details in front of
3 me.

4 Q. Well, I was going to be specific and ask you
5 about all four, so you sort of beat me to the punch here.
6 So if I asked you how many kids in each year the Charter
7 School has been open who fall into the category of
8 dropouts, truants, at-risk students as you've defined that,
9 and students who suffer from social issues, you're not
10 going to be able to give me numbers for any school year?

11 A. I can only answer it this way, to say that
12 part of our admissions process was to determine that the
13 student was at risk in the way that we said, which usually
14 involved -- which always involved a conversation with the
15 parent and the parent explaining to us, in their judgment,
16 that the student was at risk in one of those categories
17 that I just mentioned.

18 So in that sense I could tell you that
19 every student meets, in my view, one of those definitions
20 because I know it's part of our threshold process to get
21 people into the School. Part of our threshold process is
22 to say that if a student -- if a mother was to walk into
23 our School and say, you know, my kid is a successful
24 learner at Reading High School, it's highly unlikely that
25 they would be coming to I-LEAD Charter School. They would

200

1 probably not be in our admissions process.

2 Now, my understanding is legally that we
3 probably -- if we had a spot for them and we didn't have
4 that spot filled by somebody else that was at risk, we
5 would have to let them in. I think that that's the legal
6 requirement. They have a legal entitlement to come to the
7 school, but our Team, in terms of recruiting, is going
8 after students and attempting to assess in that admissions
9 process, that they are at risk in one of those ways that I
10 just suggested.

11 So I can't tell you the breakdown, and I
12 can't give you the exact numbers because I don't keep that
13 data with me, but I can tell you from a governance and
14 management of enrollment perspective, that that was the
15 standard that we pursue.

16 Q. Are you suggesting that I-LEAD Charter
17 School has never enrolled a student who had good grades,
18 A's, B's, even C's?

19 A. No, I'm not saying that because I can't
20 speak to every single case of our enrollment. I can't
21 speak to that. In fact, to the contrary, I know that
22 students had a legal right to attend the School. What I'm
23 telling you, though, is that mom or dad had to tell us in
24 the admissions process that they felt that their student
25 was at risk in some way. That was part of the admissions

201

1 process.

2 Q. So let's talk a little bit about that. What
3 are parents being asked in the admissions process?

4 A. My understanding, when I was Board Chair --
5 and I believe this process continues to the present -- is
6 that everybody goes through an orientation about the
7 School. They get explained what the School is about, our
8 code of living, our honor code, and part of that process is
9 an explanation of our mission, and part of that is an
10 assessment that this is the right institution for their
11 School, that they know what they're getting into and they
12 know that -- and they are telling us that their student is
13 at risk of academic failure, dropout. That's part of what
14 we look for.

15 Q. And in terms of them telling you that the
16 student is at risk, what do they have to say in order to be
17 enrolled in the school?

18 A. They have to tell us that their student is
19 at -- that they believe that their child is at risk of
20 academic and social failure.

21 Q. Are there any magic words?

22 A. No, there aren't magic words. It's just a
23 conversation in which we try to sincerely determine that
24 they feel that way about their child.

25 Q. So it's in the subjective belief of the

202

1 parent?

2 A. Correct.

3 Q. Does the I-LEAD Charter School then verify
4 that information in any way?

5 A. I can't speak to the details of how that
6 enrollment is conducted, but I do believe that there is an
7 effort, yes, to get a sense of the student's trajectory and
8 to -- and I know for a fact that there is an effort to
9 recruit those students who are the worst academic
10 performers and have the most significant challenges. I
11 know it for a fact that that's true.

12 Q. What specifically is done in that regard?

13 A. We try to find students that need our help.
14 We try to find students that are disconnected from school,
15 adjudicated. We try to find students that may have serious
16 social problems.

17 We have parents in the Reading School
18 District that approach us who have students that are having
19 those kinds of issues and want to come to the School. We
20 want to tell people out in the public that that's why we
21 exist, to serve that population.

22 Q. How many students are enrolled this year
23 that have been adjudicated?

24 A. I don't know the answer to that.

25 Q. What about the prior year when you were on

203

1 the Board?

2 A. I don't have specific data like that, but

3 the data does exist. We do have it.

4 Q. Does the Charter School perform any testing

5 or assessment of students before they're enrolled?

6 A. Before they're enrolled? I don't believe

7 that we do assess them before they're enrolled. I don't

8 think we're even allowed to do that.

9 Q. So you're not verifying, for example,

10 students who might be grade levels behind to determine

11 that --

12 A. Before they're enrolled?

13 Q. -- before they're enrolled?

14 A. No, we would have no way of doing that.

15 Q. You had testified earlier -- and I want to

16 make sure I understood this -- that the Charter School

17 enrolled students who were not dropouts, but who were at

18 risk, and that everyone fell in that category in the first

19 two years.

20 A. In the first two years -- I don't remember

21 saying that about the first two years. I don't remember

22 saying that.

23 Q. So I could be wrong. The transcript will

24 speak for itself.

25 A. Yeah.

204

1 Q. But if, in fact, you did say that, are you

2 saying now that that's not accurate?

3 A. I don't think there's any limitation on

4 years. I don't think that we -- you know, I don't

5 understand your question at this point. I don't know what

6 you're saying that I said because it's not making sense to

7 me.

8 Q. Let me repeat it. So I thought I heard you

9 say that the Charter School enrolled students who were not

10 dropouts, but who were at risk, and that was the entirety

11 of your population the first two years.

12 A. No, I would say that my statement was

13 probably more that that was the entirety of our population

14 period. There is the possibility, because we must -- we

15 cannot bar people from coming to the School if they are 9

16 to 12th, that we have some students that are not at risk.

17 But what I said was I think we try to

18 prioritize that enrollment, and we have an enrollment

19 policy that asks that question during the admissions

20 process from mom and dad because we believe that the

21 parents are probably in the best possible position to make

22 the assessment of whether their child is at risk.

23 Q. If you could turn to Charter School Exhibit

24 No. 1 --

25 A. Yep.

205

1 Q. -- this is the amendment request?

2 A. Yes.

3 MR. STACEY: Joint Exhibit --

4 HEARING OFFICER: Joint Exhibit 1.

5 MS. PETERSEN: I'm sorry, Joint

6 Exhibit 1, yes.

7 BY MS. PETERSEN:

8 Q. Your attorney had you identify Paragraph 11.

9 A. Yes.

10 Q. The document says that RSD or Reading School

11 District declined to include specific academic goals in the

12 2011 Charter Agreement. Why do you believe that?

13 A. Because I believe there is no provision in

14 the Charter Agreement that speaks about academic goals.

15 Q. Are you aware of the provision in the

16 Charter School Law that states that a Charter application

17 shall be incorporated into a Charter?

18 A. I am aware of that, but in this case that

19 would have created an incoherent result because the Charter

20 that was approved was materially different than the

21 application that was presented.

22 Q. So you think that the circumstances trump

23 the law?

24 A. I think that -- I think that the law tries

25 to do what's rationale.

206

1 Q. Did you ever take any steps to get clarity

2 from the School District in a Board approved document that

3 the Charter application itself was not incorporated into

4 the Charter?

5 A. Yes, I did. That was the purpose of

6 creating that attachment.

7 Q. Which you're not aware of being Board

8 approved or not?

9 A. No. I don't know -- I trust that the Board

10 followed whatever policies it had to to make a legal

11 Charter.

12 Q. Your attorney also pointed you to

13 Paragraph 13 of Joint Exhibit 1. Do you recall reading

14 that into the record?

15 A. Yes, I do.

16 Q. In Subparagraph (a) or little (a) that's

17 referenced there, there is a statement to -- I'm sorry, let

18 me ask you a different question first. Were you involved

19 in the drafting of this document?

20 A. I was part of the group that reviewed it.

21 Q. Did you supply any information to include in

22 this document?

23 A. To the best of my knowledge, I provided --

24 I assisted in gathering exhibits and in framing some of the

25 background statements, and probably may have facilitated

207

<p>1 some of the conversations that took place with leadership</p> <p>2 in the school around the proposed academic standard.</p> <p>3 Q. Were you involved in the drafting of</p> <p>4 Paragraph 13?</p> <p>5 A. Paragraph 13, meaning the paragraph that</p> <p>6 talks about this -- the Charter School recognizes that it</p> <p>7 is important, that paragraph?</p> <p>8 Q. Yes.</p> <p>9 A. To be honest, I cannot recall sitting here</p> <p>10 today where that came from.</p> <p>11 Q. Are you knowledgeable about the statements</p> <p>12 that are made in that paragraph?</p> <p>13 A. I'm knowledgeable about the existence of</p> <p>14 the paragraph in this document and what it says. Yes. I'm</p> <p>15 not generally an expert on those matters that it talks</p> <p>16 about.</p> <p>17 Q. So in terms of the little (a) that's within</p> <p>18 Paragraph 13, do you know if what the information as</p> <p>19 indicated in little (a) is accurate?</p> <p>20 A. (Witness reviewed document.)</p> <p>21 I don't know more than a member of the</p> <p>22 general public would know. I'll answer it that way. I</p> <p>23 could certainly pontificate about it. I'm not sure that</p> <p>24 you'll find that useful.</p> <p>25 Q. Let me ask a different question. Are you</p> <p style="text-align: right;">208</p>	<p>1 MS. PETERSEN: Is anyone else going to be</p> <p>2 testifying about these statements?</p> <p>3 MR. STACEY: Yes.</p> <p>4 MS. PETERSEN: And is someone else going</p> <p>5 to be testifying about Paragraphs 15 through 17?</p> <p>6 MR. STACEY: Yes.</p> <p>7 BY MS. PETERSEN:</p> <p>8 Q. In Joint Exhibit No. 5, which is the revised</p> <p>9 application, when your attorney had asked you about the</p> <p>10 goals that appear in that document --</p> <p>11 A. Yes.</p> <p>12 Q. -- you had referenced specifically, if you'd</p> <p>13 turn to Page 4, the Test of Adult Basic Education that's</p> <p>14 included in those goals. Does the Charter School</p> <p>15 administer that test?</p> <p>16 A. I don't know the answer to that question.</p> <p>17 Q. And would your answer be the same for any</p> <p>18 school year that the Charter School has been in operation?</p> <p>19 A. Yes.</p> <p>20 Q. Are you familiar with RTI or RTII, that</p> <p>21 term?</p> <p>22 A. No.</p> <p>23 Q. Are you familiar with the term, Response to</p> <p>24 Intervention?</p> <p>25 A. No.</p> <p style="text-align: right;">210</p>
<p>1 aware of whether the State's representations or</p> <p>2 pronouncements about the Pennsylvania Core Standards and</p> <p>3 the data that's on the PSSA's is even applicable to the</p> <p>4 Charter School, to I-LEAD Charter School?</p> <p>5 A. It's my understanding, generally, that the</p> <p>6 meaning and relevance of the core standards and the</p> <p>7 Keystone tests and the PSSA's is being hotly debated</p> <p>8 because it's caused schools to have performance issues with</p> <p>9 their existing population. And it is forcing people to</p> <p>10 question the meaning of the assessments, the value of the</p> <p>11 assessments, whether they're probative of the quality of</p> <p>12 the institutions, whether they're useful as a judgment of</p> <p>13 the institution's performance, and also whether additional</p> <p>14 and other measures of academic performance would be more</p> <p>15 probative.</p> <p>16 Q. Are you suggesting then that there has been</p> <p>17 a resetting of baseline academic data for Keystone Exams?</p> <p>18 A. I don't know. From a legal policy</p> <p>19 perspective, I don't know the answer to that, but I know</p> <p>20 what I read in the paper. I mean, I know what I know from</p> <p>21 speaking to people who are thinking and talking about it,</p> <p>22 public officials, legislators. I believe even the</p> <p>23 Secretary of Education himself has made many statements</p> <p>24 that call into question how these tests are being used to</p> <p>25 judge academic performance and institutional performance.</p> <p style="text-align: right;">209</p>	<p>1 Q. Is it fair to say then that you're not</p> <p>2 familiar with what, if any --</p> <p>3 MR. STACEY: Objection. None of this was</p> <p>4 covered during direct, and Ms. Petersen will have another</p> <p>5 opportunity to examine Mr. Castro in the coming weeks.</p> <p>6 MS. PETERSEN: If the answer is no, then</p> <p>7 I will stop.</p> <p>8 HEARING OFFICER: I'll let her ask that</p> <p>9 one question. If you would, repeat it.</p> <p>10 BY MS. PETERSEN:</p> <p>11 Q. Are you familiar with whether or not the</p> <p>12 Charter School is implementing a Response to Intervention</p> <p>13 program?</p> <p>14 A. I am not familiar with that.</p> <p>15 Q. Thank you. You had made some statements</p> <p>16 regarding a lack of objections that the School District had</p> <p>17 raised to the enrollment of particular students?</p> <p>18 A. Correct.</p> <p>19 Q. Are you suggesting that the School District</p> <p>20 has never objected to the enrollment or the invoicing of</p> <p>21 any student at the School?</p> <p>22 A. I believe that's correct. I mean, in terms</p> <p>23 of objecting to our enrollment forms or objecting to our</p> <p>24 invoicing for particular students, I believe that is</p> <p>25 correct. I personally don't know of any.</p> <p style="text-align: right;">211</p>

1 Q. So then it's fair to say you're not aware
2 that the School District has communicated with the Charter
3 School many times in the past regarding students being on
4 invoices from the Charter School who are, in fact, sitting
5 in class at the High School, for example?
6 A. No, I'm not aware of that. I'm not saying
7 that it didn't happen. I'm just saying that I'm not aware
8 of it.
9 MS. PETERSEN: Can we take a five-minute
10 break? I just want to go through my notes and run to the
11 ladies room.
12 HEARING OFFICER: Off the record for a
13 second.
14 (Discussion was held off the record.)
15 (Short recess was taken.)
16 HEARING OFFICER: We'll go back on the
17 record and continue with cross.
18 BY MS. PETERSEN:
19 Q. Mr. Castro, can you turn to Charter School
20 Exhibit No. 3? This is the Annual Report.
21 A. Yes.
22 Q. I believe you testified that this was a Team
23 effort. Did you prepare any portion of this document?
24 A. No, I did not.
25 Q. And in terms of the year that this report

212

1 applies to, do you know what that year is?
2 A. Yeah, I think it was filed in August of '13
3 and applied to the '12/13 school year.
4 Q. And that would have been the Charter
5 School's second year of operation. Is that correct?
6 A. Yes.
7 Q. Have you reviewed any Annual Reports of the
8 Charter School since then?
9 A. To the best of my knowledge, I have not. I
10 don't remember reviewing these Annual Reports. What I do
11 believe I would have read at the time would have been our
12 narrative reports that we created which track some of the
13 information, but it was not completely congruent.
14 Q. And you haven't identified any of the other
15 Annual Reports today; correct?
16 A. Correct.
17 Q. If you could turn to Page 7 of that
18 document, please.
19 A. (Witness reviewed document.)
20 Okay.
21 Q. If you look at the bottom of the page,
22 there's a heading there, Non-Academic Goals. Do you see
23 that?
24 A. Yes.
25 Q. And then two lines down there is the

213

1 statement, Objectives and Performance Indicators. Do you
2 see that?
3 A. Yes.
4 Q. And then there is a bulleted point that
5 says, quote, The average daily attendance rate will be at
6 least 85 percent in the first year of the school's
7 operation, will improve to 90 percent by the third year,
8 and to 95 percent by the fifth year according to daily
9 records kept by teachers, et cetera, et cetera, end quote.
10 Do you see that?
11 A. Yes.
12 Q. Would you agree with me that that bulleted
13 point is taken straight out of the Charter School's revised
14 application?
15 A. I would have to look at it. I don't
16 recall, to tell you the truth. I don't recall. But if you
17 want, we can look. I can tell you that I believe that
18 these -- there's a process, a planning process that PDE
19 requests Charter Schools to participate in, in which they
20 ask us to develop goals and objectives.
21 And so this goal and objective would have
22 been generated by the School Team in connection with that
23 process -- in connection with that internal planning
24 process.
25 Q. If you could turn to Joint Exhibit 5,

214

1 please.
2 A. (Witness complies.)
3 Q. And specifically to Page 8.
4 A. (Witness complies.)
5 Yep.
6 Q. Under the Section 1.2.B and there's a
7 statement, Non-Academic Goal No. 1. Do you see that?
8 A. Um-hum.
9 Q. Would you agree with me that the language
10 that is quoted under Non-Academic Goal No. 1 in terms of
11 the first bulleted point under Objectives and Performance
12 Indicators is, in fact, the same language that appears in
13 the Annual Report on Page 7?
14 A. Yes.
15 Q. So the Annual Report on Page 7 is reflective
16 -- is reflecting goals that the Charter School set forth in
17 the revised application?
18 A. It's consistent with those goals. Yes.
19 Q. And the Charter School was measuring itself
20 against those goals; correct?
21 A. In part, yes.
22 Q. And if you look in the Annual Report at the
23 very bottom of Page 7, it indicates what the daily
24 attendance rate was during the 2012/2013 school year. Do
25 you see that?

215

<p>1 A. Yes.</p> <p>2 Q. What was it?</p> <p>3 A. It says that the daily attendance rate was</p> <p>4 81 percent.</p> <p>5 Q. And the Annual Report does not distinguish</p> <p>6 that attendance rate for any particular grade level of</p> <p>7 students, does it?</p> <p>8 A. No, it does not.</p> <p>9 Q. Would you agree with me that the Charter</p> <p>10 School did not meet the goal that it had established for</p> <p>11 itself in the revised application with respect to daily</p> <p>12 attendance?</p> <p>13 A. If you're asking me if it says that, if</p> <p>14 81 percent is less than 85 percent, yes, it is.</p> <p>15 Q. And 85 percent was the goal in the first</p> <p>16 year?</p> <p>17 A. Yes.</p> <p>18 Q. And that this is in the second year of the</p> <p>19 Charter School; correct?</p> <p>20 A. Correct.</p> <p>21 Q. And on the next page at the top of Page 8,</p> <p>22 the Annual Report indicates what the attendance rate was in</p> <p>23 the '11/12 school year; correct?</p> <p>24 A. Yes.</p> <p>25 Q. What was it?</p> <p style="text-align: right;">216</p>	<p>1 compensation from I-LEAD Charter School on a W-2 form from</p> <p>2 I-LEAD?</p> <p>3 A. I received zero compensation from I-LEAD</p> <p>4 Charter School at any time.</p> <p>5 Q. Have you ever received a 1099?</p> <p>6 A. Nothing.</p> <p>7 Q. Have you ever been reimbursed for expenses?</p> <p>8 A. No.</p> <p>9 Q. Have you ever given money to the Charter</p> <p>10 School?</p> <p>11 A. Yes, I have.</p> <p>12 Q. Can you turn to Joint Exhibit 7?</p> <p>13 A. Yeah.</p> <p>14 Q. Can you go to Page 3?</p> <p>15 A. The Addendum?</p> <p>16 Q. Yes.</p> <p>17 A. (Witness complies.)</p> <p>18 Yes.</p> <p>19 Q. The first paragraph of that Addendum says,</p> <p>20 and I quote, By and between the Institute for Leadership</p> <p>21 Education, Inc., and the Reading School District. Is the</p> <p>22 Institute for Leadership Education, Inc., the Charter</p> <p>23 School, or is that I-LEAD, Inc.?</p> <p>24 A. That would be I-LEAD, Inc. Yeah, that</p> <p>25 would be I-LEAD, Inc.</p> <p style="text-align: right;">218</p>
<p>1 A. I'm sorry. The '11/12 rate was 76 percent.</p> <p>2 I believe that's what it says.</p> <p>3 Q. And that was the first year of the Charter;</p> <p>4 correct?</p> <p>5 A. Yes.</p> <p>6 Q. Do you know if the other information that's</p> <p>7 conveyed in this document is accurate?</p> <p>8 A. I don't know. I believe that it is because</p> <p>9 I believe that everything that we put together was as</p> <p>10 accurate and reflective of what we understood at the time,</p> <p>11 but I don't have personal knowledge of the data upon which</p> <p>12 the report was drawn.</p> <p>13 Q. And you would expect that the folks who are</p> <p>14 receiving this document, including the School District and</p> <p>15 the folks at the Department of Education, could rely on the</p> <p>16 statements that are made in here?</p> <p>17 A. Yes.</p> <p>18 MS. PETERSEN: That's all I have.</p> <p>19 BY MR. STACEY:</p> <p>20 Q. You stated on cross-examination that one</p> <p>21 group of students that I-LEAD Charter actively recruits are</p> <p>22 students that are habitually truant. Is that correct?</p> <p>23 A. Yes.</p> <p>24 Q. Earlier there was testimony regarding your</p> <p>25 role at the Charter School. Have you ever received</p> <p style="text-align: right;">217</p>	<p>1 Q. Do you know who prepared this document?</p> <p>2 A. I don't. I don't know.</p> <p>3 MR. STACEY: I don't have anything</p> <p>4 further.</p> <p>5 MS. PETERSEN: Nothing.</p> <p>6 HEARING OFFICER: Mr. Castro, you're</p> <p>7 excused.</p> <p>8 THE WITNESS: Thank you.</p> <p>9 HEARING OFFICER: Do you have another</p> <p>10 witness today?</p> <p>11 MR. STACEY: I do.</p> <p>12 HEARING OFFICER: Do you want to go off</p> <p>13 the record a second?</p> <p>14 MR. STACEY: Yeah, sure.</p> <p>15 (Discussion was held off the record.)</p> <p>16 MR. STACEY: I will officially say that</p> <p>17 the Charter School calls Dr. James Bohan.</p> <p>18 JAMES F. BOHAN</p> <p>19 was called as a witness and, having been first duly sworn</p> <p>20 by the Reporter-Notary Public, was examined and testified</p> <p>21 as follows:</p> <p>22 BY MR. STACEY:</p> <p>23 Q. Can you state and spell your name for the</p> <p>24 record?</p> <p>25 A. Yeah, it's James F. Bohan, B-O-H-A-N.</p> <p style="text-align: right;">219</p>

<p>1 Q. Dr. Bohan, what is your position at I-LEAD 2 Charter School? 3 A. I am the Principal and Chief Academic 4 Officer. 5 Q. How long have you served in that position? 6 A. Since about July 1st of 2015. 7 Q. Prior to that position, did you have a 8 position at I-LEAD? 9 A. I was a math consultant from December of 10 2014 until the end of June. 11 Q. Just to be clear, that's I-LEAD Charter 12 School? 13 A. I-LEAD Charter School. 14 Q. So until how long have you been with the 15 Charter School? 16 A. A little over a year. 17 Q. Prior to working with the Charter School, 18 where did you work and in what capacity? 19 A. I started teaching math a very long time 20 ago and spent 37 years in a math classroom. About 21 or 2 21 of those I was a Math Supervisor, culminating with being a 22 K to 12 Math Coordinator in Pennsylvania here. I left the 23 District in 2005 and then spent six full-time years with 24 the Pennsylvania Value Added Assessment System, which is 25 PVAAS with two A's. And in 2011, I officially retired from</p> <p style="text-align: right;">220</p>	<p>1 And then going up on the other end of that, 2 I deal with an awful lot of teachers through the College 3 Board for AP statistics and AP calculus. 4 Q. What was the nature of the work when you 5 were -- where did you do the PVAAS work? 6 A. All over the State. I was housed in 7 Lancaster, but we basically worked through the IU system, 8 and I think over the six years I visited all 29 IU's 9 several times. And then within that structure, we dealt 10 with the districts in each of those IU's. 11 Q. How did you first learn about an opportunity 12 at the Charter School? 13 A. I received a call by the then -- I think 14 she was Curriculum Director at Berks County IU, who I knew 15 through PVAAS, and she said she had been talking to the CEO 16 of a Charter School that really wanted some, you know, 17 intense investigation into their math program and 18 assessment and so forth. And she very flatteringly 19 immediately thought of me, and I called Angel, and we were 20 kind of off and running from that point. 21 Q. Meaning Angel Figueroa? 22 A. Yes. 23 Q. What were you told by this person at the 24 BCIU about I-LEAD Charter School, if anything? 25 A. Just the fact that they have a real</p> <p style="text-align: right;">222</p>
<p>1 full-time work, but then I've been continuing consulting 2 with the College Board and consulting with school districts 3 and so forth since that time. 4 Q. So you're still doing that other consulting 5 work? 6 A. Yes, I am. 7 Q. Is your position at the Charter School a 8 part-time position? 9 A. Yes. 10 HEARING OFFICER: Sir, what district did 11 you work with? 12 THE WITNESS: Manheim Township School 13 District. 14 HEARING OFFICER: Thank you. 15 THE WITNESS: And then I had a Parochial 16 school in Illinois and also a private school in Illinois. 17 HEARING OFFICER: Thank you. 18 BY MR. STACEY: 19 Q. If you don't mind, what are some of those 20 other schools or entities that you currently provide 21 services to? 22 A. Primarily, they are public schools. In 23 particular, I deal mostly with secondary, middle school and 24 high schools in terms of math programs, rigor of 25 instruction, you know, PA Core, Keystone.</p> <p style="text-align: right;">221</p>	<p>1 challenge based on the population they have. I went and 2 checked, you know, the public works that I could find about 3 them, which was primarily PVAAS and SPP, School Performance 4 Profiles. 5 So I gathered as much publicly available 6 data as I could find, and pretty much confirmed what she 7 says, that it was high poverty, high minority, really 8 challenging students, many of whom were at risk by just 9 about any definition you want to take. 10 Q. So first as a consultant to the Math 11 Department, that was your first position, right, consultant 12 to the Math Department? 13 A. Right. 14 Q. When you were in that consultant position, 15 what were you tasked with doing? 16 A. Primarily, it was taking a look at the 17 program, you know, the sequence of math courses, with a 18 real focus of improving the preparation for Keystone 19 Algebra success on that exam. Then along with that and 20 sort of as completely interlocking with that was the whole 21 issue of what data were they gathering and how are they 22 using the data, both in terms of benchmarking where the 23 students are in terms of their progress towards readiness 24 to take the Keystone and/or SAT's, it's basically the same 25 kind of thing, as well as using that information to</p> <p style="text-align: right;">223</p>

<p>1 generate changes in instruction and emphases based on --</p> <p>2 and we went all the way from the entire course structure of</p> <p>3 how many sections there are and boiled it down to each</p> <p>4 classroom, you know, where their strengths were and where</p> <p>5 they needed some attention.</p> <p>6 Q. Was this for all grades at the Charter</p> <p>7 School?</p> <p>8 A. Yes. In math. However, I will say Science</p> <p>9 and English Language Art kind of replicated what I was</p> <p>10 doing in math, particularly from the data side.</p> <p>11 Q. So can you describe some of the challenges</p> <p>12 that you observed facing I-LEAD Charter School?</p> <p>13 A. Well, the biggest challenge was the fact, I</p> <p>14 think curricularly, is they didn't have a really good sense</p> <p>15 of the population that was entering. There were many</p> <p>16 students who were being placed in Algebra 1 that really</p> <p>17 weren't ready for Algebra 1. They had what I determined to</p> <p>18 be a very typical problem -- I had it in Manheim Township</p> <p>19 as well -- that students coming into the district -- and</p> <p>20 I'm sure Reading has the same problem -- there was some</p> <p>21 conversation earlier about transcripts. Transcripts are,</p> <p>22 at best, a guess. I mean, even though they may be official</p> <p>23 and get a seal on them and so forth, if I -- I used to</p> <p>24 always say if I got -- not to pick on a State, but if I got</p> <p>25 a transcript that said somebody got an A in Algebra 1 from</p> <p style="text-align: right;">224</p>	<p>1 A. Any student that did not go to our School,</p> <p>2 which means since we're 9 to 12, we see no PSSA scores. As</p> <p>3 a privacy issue, which has been around for years and</p> <p>4 actually both the State data tool for PSSA, Keystone</p> <p>5 Performance and PVAAS tries to address that in different</p> <p>6 ways.</p> <p>7 The PSSA report allows for what is called a</p> <p>8 feeder report, which basically looks at who do you have as</p> <p>9 registered in your school, and let's go back and look at</p> <p>10 the feeder schools that we get. Okay. It doesn't work for</p> <p>11 us because we don't have an exact feeder relationship set</p> <p>12 up with the State.</p> <p>13 In PVAAS, once the official enrollment to</p> <p>14 PIMS, which is the Pennsylvania -- I just looked it up, the</p> <p>15 M is Management System, Pennsylvania Information Management</p> <p>16 System, but that's the Statewide database about all the</p> <p>17 students. Once that's uploaded with the October 1st actual</p> <p>18 enrollments, then PVAAS will report PVAAS scores and</p> <p>19 history for currently enrolled students, which is very,</p> <p>20 very helpful to us.</p> <p>21 Unfortunately, that facility didn't happen</p> <p>22 until early November, so in terms of getting any sort of</p> <p>23 insight in an official sense, notwithstanding report cards</p> <p>24 or transcripts or testimonies from the parents</p> <p>25 academically, they don't have a lot of information coming</p> <p style="text-align: right;">226</p>
<p>1 Mississippi, I'm not sure that A in Algebra 1 in</p> <p>2 Mississippi is comparable to what it is in Pennsylvania or</p> <p>3 New York or Massachusetts and so forth.</p> <p>4 So, consequently, it's a piece of data you</p> <p>5 look at, but one of the challenges that I-LEAD has, I</p> <p>6 think, particular to them is the fact that since they're 9</p> <p>7 to 12, they have to rely on a really small amount of</p> <p>8 information about incoming students.</p> <p>9 For example, we can't see their PSSA</p> <p>10 scores. When I was in the K to 12 district, I used to</p> <p>11 track student's PSSA scores from 3rd grade all the way</p> <p>12 through -- at that time it used to be 11th grade, but now</p> <p>13 it'd be 8th grade and then they'll have the keystones.</p> <p>14 So that was a real issue, is the fact that</p> <p>15 they really didn't have a sense of who the population was</p> <p>16 and exactly what to do about that. Consequently, we spent</p> <p>17 a lot of time talking about how better to analyze the</p> <p>18 incoming students, and then based on that analysis, what</p> <p>19 should the curricular sequence look like that will,</p> <p>20 hopefully, lead them to a successful experience with the</p> <p>21 State testing, State and National testing, really.</p> <p>22 Q. Can you explain in a little bit more detail,</p> <p>23 not having -- you said they don't have access to their PSSA</p> <p>24 scores. I assume you mean I-LEAD Charter School does not</p> <p>25 have access to whose PSSA scores?</p> <p style="text-align: right;">225</p>	<p>1 in.</p> <p>2 Q. Just so we can back up a second, what is</p> <p>3 PVAAS?</p> <p>4 A. PVAAS is a value added assessment system.</p> <p>5 Basically, there's two parts to it. The first part is</p> <p>6 growth. For keystones it's based on looking at each</p> <p>7 student that has sufficient history and making a prediction</p> <p>8 on what they should do on the Keystone exam. Then they</p> <p>9 compare what they were predicted to do with that they did.</p> <p>10 And it's a very, very robust statistical model. I'm really</p> <p>11 jealous of it because I wish I would have written it. It's</p> <p>12 really an amazing tool.</p> <p>13 The problem is you have to have enough data</p> <p>14 in the pool, and it has to be PSSA data because it's really</p> <p>15 critical for the algorithms that they use that it be as</p> <p>16 universal a set of data as possible.</p> <p>17 So consequently, with districts like</p> <p>18 Reading or, in particular, like up in the Poconos or</p> <p>19 Philadelphia, as well as at I-LEAD, an enormous number of</p> <p>20 students coming in from out of state have no PSSA data. So</p> <p>21 they will not see any PVAAS data, and there will be no</p> <p>22 PVAAS reporting on how those students have grown or</p> <p>23 whatever.</p> <p>24 The other side of PVAAS is basically we</p> <p>25 take that data and we actually project what will their</p> <p style="text-align: right;">227</p>

<p>1 score be and what's the probability of them falling into 2 performance categories. So, for example, the most typical 3 projection that we look at is what is the probability and 4 how many of any cohort of students would be 70 to a hundred 5 percent likely to score proficient or advanced. We call 6 that likely.</p> <p>7 40 to 70 percent probability, we say -- I 8 always say it's a technical term -- it's iffy. It can go 9 either way. Let's basically flip a coin. Below 10 40 percent, that is considered unlikely, both statistically 11 -- and I should point out maybe to save a question from 12 your colleague here -- anyway, we changed those numbers to 13 match up with the RTII people, that we originally in PVAAS 14 had different probability cutoffs or likely iffy and 15 unlikely, and in consultation with the RTII people, we 16 adjusted it to 40 and 70.</p> <p>17 Q. You stated just earlier now you didn't get a 18 set of data until early November. I'm just trying to 19 clarify that. What data set are you talking about, and do 20 you mean November of this year or do you mean in November 21 of any school year?</p> <p>22 A. In November of any school year. The 23 currently enrolled projections, that is, what is the 24 likelihood of where these kids are going to go based on 25 their prior history, that is not reported for the currently</p> <p style="text-align: right;">228</p>	<p>1 Q. If you're a 9th grader in the Reading School 2 District and you've been there your whole life, you enter 3 the 9th grade at the Citadel, the educators at the Citadel 4 can see your history of PSSA performance.</p> <p>5 A. Correct. They can also see a projection of 6 how likely it is for you to be proficient or advanced on 7 the Keystone Algebra 1, the Keystone literacy, and the 8 Keystone bio.</p> <p>9 Q. If you are a 9th grader at I-LEAD Charter 10 School, even if you have gone to the Reading School 11 District your entire life and taken all the PSSA's, that is 12 not available at I-LEAD Charter School.</p> <p>13 A. That's correct.</p> <p>14 Q. What if you enroll in I-LEAD Charter School 15 as an 11th grader?</p> <p>16 A. It really -- it doesn't make any 17 difference. The issue is we have to wait until the 18 currently enrolled attendance file is uploaded to PIMS 19 before PVAAS can do it. Once that happens and then PVAAS, 20 in terms of students transferring at other times of the 21 year, will -- schools are required to upload their 22 currently enrolled set several times during the year.</p> <p>23 Each time PVAAS will take those kids and 24 make their projection reports available as well, but if an 25 11th grader comes in in September, we'll have absolutely no</p> <p style="text-align: right;">230</p>
<p>1 enrolled students until November.</p> <p>2 In September, late September, we get the 3 projections -- and this is across the State. This isn't 4 just us. But across the State they will get the projection 5 scores of students who were tested last year in their 6 system.</p> <p>7 So, for example, 9th grade at the Citadel 8 will get projections from as early as the middle to late 9 September of how their 9th graders are going to do because 10 they're 8th graders. Any of those who were in the system 11 will be reported to them.</p> <p>12 The fact that we don't have anybody in our 13 system that was tested last year because it's a 9th grade 14 coming in, we can't see the grade tested. We have to wait 15 until the enrollment information is input up to PIMS, who 16 then lets PVAAS know, and then they give currently enrolled 17 data, which is much more useful to us because that means, 18 for example, for 9th graders, those actually are the 9th 19 graders sitting in our classes.</p> <p>20 MR. STACEY: Can I have permission to lead 21 just a couple questions just so I'm understanding what's 22 going on about what he just said?</p> <p>23 HEARING OFFICER: Ask the question and 24 we'll see what happens.</p> <p>25 BY MR. STACEY:</p> <p style="text-align: right;">229</p>	<p>1 information, if they come in as soon as they're listed with 2 the State as being currently enrolled for us, then we'll 3 get a PVAAS report.</p> <p>4 And it's really -- I almost wish I could 5 show you the report. The only way that we get history on 6 PSSA for our students at I-LEAD is we take a particular 7 projection report that PVAAS provides that shows their 8 history in terms of supporting what that projection is 9 doing.</p> <p>10 We cannot get a list of our students and 11 what they did on PSSA's. We really wish we could, but we 12 don't.</p> <p>13 Q. Thank you for that. Can you turn in this 14 small binder, Charter School Binder 1 of 2 -- you can move 15 that one in front of you.</p> <p>16 A. Okay.</p> <p>17 Q. Tab 8, please.</p> <p>18 A. (Witness complies.)</p> <p>19 Okay.</p> <p>20 Q. Do you recognize this document?</p> <p>21 A. Yes.</p> <p>22 Q. Were you involved in the preparation of this 23 document?</p> <p>24 A. Yes, I was.</p> <p>25 Q. In what way?</p> <p style="text-align: right;">231</p>

<p>1 A. When I took over as Principal on July 1st, 2 this document was in process. Basically -- I'm sure 3 everybody who has compared the two notice that they're a 4 very similar format to the prior year's one. And, in fact, 5 prior to taking over as Principal for the former Principal, 6 she asked me if I would update the data side of that and so 7 forth, which I did as a consultant. 8 Once I took over as Principal, I was asked 9 to kind of take charge of it. So, consequently, having 10 very little experience with the school, I went through as 11 much as possible and talked to the Administrative Team and 12 the different faculty members and so forth to try and make 13 this as accurate as possible. 14 Q. Is it fair to say you were the author of 15 this document? 16 A. I would prefer to call me a facilitator of 17 it. I will say some of the -- particularly some of the 18 things about the academic side were primarily written by 19 me, but in terms of a lot of the issues of the nature of 20 the school and some of the earlier sections, we just sort 21 of looked at that from the previous one or tweaked them. 22 Q. When you refer to the previous one, are you 23 meaning Charter School Exhibit 7, the tab right in front of 24 it? 25 A. Yep.</p> <p style="text-align: right;">232</p>	<p>1 Now, saying that, for example, in the 2 middle of the second bullet it says, Technical assistance 3 included, the analysis of performance data and so forth, 4 not a lot of that was going on and, as is indicated later 5 in the report, we initiated a lot of assessment and 6 interpretation of data. 7 Q. When you say not a lot of that was going on, 8 do you mean prior to your -- 9 A. Right. 10 Q. -- prior to your what? 11 A. Me coming there as a consultant. 12 Q. You mentioned the Keystone Team, which I see 13 in that first bullet the document reads: ILCS has assigned 14 a dedicated Keystone Team of educators and administrators. 15 You said that you were part of that Keystone Team? 16 A. Yes. 17 Q. Can you tell me who is on that Team and what 18 do they do? 19 A. Basically, it was administrators that were 20 involved with anything that had to do with Keystone 21 preparation. There was also, I think, the Department 22 leaders from Math, Science and English Language Arts. 23 There was a particular person who had sort of the ex 24 officio title of Test Coordinator. She made sure that all 25 of the logistics were there and so forth.</p> <p style="text-align: right;">234</p>
<p>1 Q. What do you understand to be the purpose of 2 this document? 3 A. I actually thought -- and if you wanted to 4 see it, I could show you on my computer -- that document is 5 listed as the Annual Report to the Reading School District. 6 That's what I thought it was. If it's not, then I don't 7 know what the Annual Report looks like. 8 Q. Fair enough. Can you turn to Page 5, 9 please? This is of Charter Exhibit 8. 10 A. (Witness complies.) 11 Okay. 12 Q. The middle of Page 5, can you tell me what's 13 going on on this page? First, is this a part of the report 14 that you would have authored? 15 A. I certainly had a lot to do with it. For 16 example, the Keystone Team was in place when I arrived as a 17 consultant. I was asked to join it, and I happily did. 18 And they were really very gracious about moving the meeting 19 until a time that I could be there. 20 So that part was in place. What was going 21 on, you know, and what's being listed there was already in 22 place, and a lot of it I have to say was kind of tweaked by 23 me, but primarily this is what was in place coming from the 24 '13/14 document of the priority and the ways we were going 25 to attack it.</p> <p style="text-align: right;">233</p>	<p>1 And the group really talked about how we 2 were going to conduct and who do we identify. We had a 3 person in the Administration at that time that was called 4 the Director of Teacher Effectiveness. He has since 5 changed to be the Vice Principal under me. 6 And so it was basically, you know, the idea 7 of getting everybody to help focus the whole environment on 8 the keystones. 9 Q. How often does that Team meet? 10 A. At that time it was meeting once a week. 11 Q. Which time was this? 12 A. During '14/15. 13 Q. What about now, has that changed? 14 A. Yes, it is. What we've done is we've 15 expanded it so that there is now a separate meeting of all 16 Department leaders from all departments once a week. And 17 then about an hour later there's a meeting of all 18 Administrators once a week. 19 And basically I and my Academic Team are 20 the conduit from the Department leaders to the 21 Administrators and back and forth so that we can have a 22 larger group that's still efficiently collaborating on 23 improving performance and understanding. 24 Q. What happens at those meetings, what do you 25 talk about?</p> <p style="text-align: right;">235</p>

<p>1 A. Department leaders, we talk a lot about</p> <p>2 grading, grading philosophy, instructional ideas, this type</p> <p>3 of thing. We instituted a shift in how attendance is</p> <p>4 taken. Right now we use eSchoolPLUS, which I'm guessing</p> <p>5 pretty much most of the districts in IU14, Berks County, do</p> <p>6 that.</p> <p>7 However, a decision was made a couple years</p> <p>8 ago not to utilize it as well as it can be, so we put in</p> <p>9 place an attendance discrepancy log process by which the</p> <p>10 learning facilitators can identify students who are either</p> <p>11 not on the full attendance bulletin for a whole day</p> <p>12 absence, but aren't in class, or they are on the bulletin,</p> <p>13 but they're in class so that we can get the machinery going</p> <p>14 on and so forth.</p> <p>15 There's a lot of those kinds of details.</p> <p>16 There's a lot of talk about discipline and restorative</p> <p>17 practices, which is a nationwide program in terms of</p> <p>18 restoring -- I don't know how to explain it exactly, but</p> <p>19 basically restoring the confidence of the students, that</p> <p>20 they can succeed and want to exceed and so forth. So</p> <p>21 partnering that with discipline and so forth.</p> <p>22 So virtually at the Department leader</p> <p>23 meeting we talk about absolutely anything that could affect</p> <p>24 curriculum instruction and assessment. Even to opening the</p> <p>25 grading window, parent conferences, everything comes up in</p> <p style="text-align: right;">236</p>	<p>1 Q. You see the heading that says Academic</p> <p>2 Program Response?</p> <p>3 A. Yep.</p> <p>4 Q. Under that first part, Instructional Focus,</p> <p>5 it says the instructional focus for '14/15 is mathematics.</p> <p>6 What does that mean, there was a shift to mathematics?</p> <p>7 A. In '13/14 English Language Arts had been</p> <p>8 identified as a focus. One of the ways -- and you can see</p> <p>9 that in the first bullet -- was we have as part of homeroom</p> <p>10 a Keys to Success period every day first thing in the</p> <p>11 morning.</p> <p>12 When English Language Arts was the focus,</p> <p>13 that was full of activities and information and</p> <p>14 reinforcement, all kinds of things like that from the</p> <p>15 English Department for the entire school.</p> <p>16 Last year, because math was set up as the</p> <p>17 focus, the Math Department provided activities and</p> <p>18 resources for Keys to Success all year long. That's just</p> <p>19 one way.</p> <p>20 The other thing you'll notice a big shift</p> <p>21 was last year, beginning after I started, is I really</p> <p>22 pushed for everybody to get all of the students, if</p> <p>23 possible, to take the CDT's, CDT, Classroom Diagnostic</p> <p>24 Testing. That's a free system available from the State</p> <p>25 that is totally aligned and totally focused on the pre-</p> <p style="text-align: right;">238</p>
<p>1 there.</p> <p>2 The admin meeting likewise, first of all,</p> <p>3 starts with all the deliberations that the Department Heads</p> <p>4 had had that day. And then we take sort of the</p> <p>5 administrative side to it.</p> <p>6 So, for instance, you were asking Mr.</p> <p>7 Castro about the orientation process. It has changed this</p> <p>8 year based on the collaboration of all the Administrators.</p> <p>9 In fact, the first one of the new ones started -- today is</p> <p>10 Thursday -- they started yesterday. And we went from a</p> <p>11 single basically morning orientation that now, beginning</p> <p>12 yesterday, is a three-day orientation. It's basically that</p> <p>13 kind of thing.</p> <p>14 We talk a lot about professional</p> <p>15 development, what direction should they be going. I like</p> <p>16 to think the Department leaders meeting is focused on just</p> <p>17 their curriculum and how their curriculum intersects with</p> <p>18 other curriculums.</p> <p>19 The Administration meeting is then focused</p> <p>20 on all of the administrative -- no offense to any</p> <p>21 Administrators, but all the administrative minutiae that</p> <p>22 has to happen to make those academic things happen.</p> <p>23 Q. Can you turn to Page 6?</p> <p>24 A. Um-hum.</p> <p>25 (Witness complies.)</p> <p style="text-align: right;">237</p>	<p>1 Keystone exams, as well as now it's been extended all the</p> <p>2 way down to 3rd grade for all of the PSSA exams as well, so</p> <p>3 we had that.</p> <p>4 We had all of our likely candidates for the</p> <p>5 winter 2014 testing take the CDT to get a sense of if they</p> <p>6 were ready or not. And then later in the spring we had</p> <p>7 everybody take it to establish a baseline. This year,</p> <p>8 since we were starting off basically fresh and new,</p> <p>9 basically once school started and things settled down with</p> <p>10 the sections and all that stuff, we tried to do CDT tests</p> <p>11 on all the students to see where they were.</p> <p>12 Q. When you say this year, you mean the '15/16</p> <p>13 school year?</p> <p>14 A. '15/16, yes.</p> <p>15 Q. This report is about the '14/15 school year?</p> <p>16 A. Right.</p> <p>17 Q. So did you begin Classroom Diagnostic</p> <p>18 Testing in '14/15 school year?</p> <p>19 A. Yes.</p> <p>20 Q. Let me come back to that question. Can you</p> <p>21 turn to Page 7?</p> <p>22 A. Okay.</p> <p>23 Q. Let's just clarify. Is this part of the</p> <p>24 section that you authored? Is this part of the report that</p> <p>25 you authored, this page, Page 7, under the heading</p> <p style="text-align: right;">239</p>

<p>1 Curriculum?</p> <p>2 A. I would say that I created the draft, but</p> <p>3 then I truly am a firm believer in collaboration</p> <p>4 participation, so all of the Academic Team would have</p> <p>5 participated.</p> <p>6 Q. Did you review the final version of this</p> <p>7 report?</p> <p>8 A. Yes, I did.</p> <p>9 Q. Was that version consistent with your first</p> <p>10 draft?</p> <p>11 A. Very much so.</p> <p>12 Q. In terms of the data conveyed?</p> <p>13 A. Yes.</p> <p>14 Q. In terms of the factual statements regarding</p> <p>15 what had happened in that school year?</p> <p>16 A. As best as I could establish, again, coming</p> <p>17 on late in the -- well, late as in December, but also being</p> <p>18 focused on math for most of the year, I did rely on the</p> <p>19 people who were much closer to it in terms of the accuracy,</p> <p>20 but I feel very good about it.</p> <p>21 Q. Under that Curriculum heading, the second</p> <p>22 sentence says: The curriculum as described in the '13/14</p> <p>23 School Report was adjusted based on the response and</p> <p>24 reactions of the learners present at I-LEAD Charter School</p> <p>25 for 2014/15. Does that apply to math curriculum?</p> <p style="text-align: right;">240</p>	<p>1 the window is approximately from about December 15th to</p> <p>2 January 15th, somewhere in there. It's designed primarily</p> <p>3 for schools that are on block scheduling, and students</p> <p>4 would have taken, say, for instance, the Algebra 1 test or</p> <p>5 Algebra 1 course entirely in one semester.</p> <p>6 It's also used for make-up work as students</p> <p>7 who do not pass both modules of the Keystone the first time</p> <p>8 are required by the State to take it a second time, so a</p> <p>9 lot of schools and districts set things up so that the fall</p> <p>10 semester, once they fail the test, is used for remediation</p> <p>11 and they can take the winter test again.</p> <p>12 The spring test is basically the --</p> <p>13 designed to be the overall end of course test for the</p> <p>14 majority of students who would have been in a full year</p> <p>15 Keystone course.</p> <p>16 Q. What are these charts on Page 10</p> <p>17 representing?</p> <p>18 A. What they're representing was the fact</p> <p>19 that -- based on using a really kind of intense data</p> <p>20 informed process, what we're saying is that the students</p> <p>21 who were identified to take these exams were not identified</p> <p>22 strictly on the basis of chronology or what grade they were</p> <p>23 in and all that kind of thing.</p> <p>24 We basically felt -- and I have to say I</p> <p>25 have to believe all educators will agree with this</p> <p style="text-align: right;">242</p>
<p>1 A. It actually was applied for all curriculum.</p> <p>2 Again, I am not sure because of the timing there what the</p> <p>3 process was, but I know in every other school that I've</p> <p>4 worked at basically one of the most important times is once</p> <p>5 the school year closes to have the faculty get together and</p> <p>6 reflect on what worked and what didn't work and set into</p> <p>7 motion tweaks for the next year.</p> <p>8 That did occur there. I'm not exactly sure</p> <p>9 what the process was. The issue is there were issues -- I</p> <p>10 mean, we have resources of the Core Standards and that type</p> <p>11 of thing, but a lot of it we were really kind of tapping in</p> <p>12 there to the idea of all of the local assessment that we</p> <p>13 had and the teachers' experiences with the students.</p> <p>14 Q. Turn to Page 9.</p> <p>15 A. (Witness complies.)</p> <p>16 Okay.</p> <p>17 Q. And then following on Page 10 there's three</p> <p>18 charts. Did you specifically prepare these charts?</p> <p>19 A. Yes, I did.</p> <p>20 Q. Under the chart on Page 10 -- I'm sorry --</p> <p>21 are these charts about winter Keystone results?</p> <p>22 A. Yes.</p> <p>23 Q. And what is meant by winter?</p> <p>24 A. There's two testing administrations for</p> <p>25 Keystone each year. One is called the winter one, which</p> <p style="text-align: right;">241</p>	<p>1 statement -- that it's really kind of silly to have a</p> <p>2 student take a test you know they're going to destroy.</p> <p>3 So consequently, you know, what we did</p> <p>4 there was use the process of really looking at the data and</p> <p>5 picking the candidates who we thought was likely to</p> <p>6 succeed. And the issue is not only did we use it again for</p> <p>7 qualification, but we also, from the time the CDT's were</p> <p>8 given, we were adapting their instructional programs as</p> <p>9 well.</p> <p>10 Now, the question is how good were these</p> <p>11 results. Well, there's two things. The only thing we</p> <p>12 really had to compare them to --</p> <p>13 Q. Well, let's back up a second. Once again, I</p> <p>14 can provide color pages. I apologize for that. If we look</p> <p>15 at -- well, let's go back. Students were selected to</p> <p>16 participate in the 2015 winter Keystone. Is that correct?</p> <p>17 A. Correct.</p> <p>18 Q. How were those students selected?</p> <p>19 A. First of all, we prepared a list of all the</p> <p>20 students that we could identify, again, noticing the</p> <p>21 weakness in terms of enrolled students versus others, but</p> <p>22 of the students we could identify who had completed an</p> <p>23 Algebra 1 course at some point in their career and had not</p> <p>24 passed the Keystone test. So that's sort of the first cut</p> <p>25 of candidates.</p> <p style="text-align: right;">243</p>

<p>1 Then what we did is basically make sure</p> <p>2 that, you know, they were all in appropriate classes to be</p> <p>3 prepared for the Keystone. We gave those classes CDT tests</p> <p>4 in all three areas. And based on that, we identified, you</p> <p>5 know, who were the ones that seemed most likely all the way</p> <p>6 down to the least likely, but we also supplied the teachers</p> <p>7 of all those classes with very targeted recommendations for</p> <p>8 how to change the instructions to ready the students.</p> <p>9 Q. So in these charts, in each chart there's a</p> <p>10 row of numbers that corresponds with 2014.</p> <p>11 A. Yep.</p> <p>12 Q. And then there's a row that corresponds with</p> <p>13 numbers in 2015.</p> <p>14 A. Right.</p> <p>15 Q. Are you stating that the students were</p> <p>16 selected to take the winter Keystone in 2015 using the</p> <p>17 measures you just described?</p> <p>18 A. Right.</p> <p>19 Q. And that was being compared to all learners</p> <p>20 taking the winter Keystone in 2014?</p> <p>21 A. It was the spring Keystone I used.</p> <p>22 Q. Spring of 2014?</p> <p>23 A. Yes.</p> <p>24 Q. So why is this important to measure?</p> <p>25 A. Well, I think it's important to measure</p> <p style="text-align: right;">244</p>	<p>1 if you're in this course, you have to take the Keystone,</p> <p>2 and everybody in the world knows that those students are</p> <p>3 not going to be successful unless some great miracle</p> <p>4 happens. And yet the kids end up in those courses and end</p> <p>5 up having to take the test anyway.</p> <p>6 Q. When you came in as a consultant, did you</p> <p>7 see an issue with the school placing kids into Algebra 1 or</p> <p>8 having to place them into these trigger courses?</p> <p>9 A. Absolutely.</p> <p>10 Q. Generally, how have you gone about</p> <p>11 addressing that?</p> <p>12 A. Two really major things we did. And I made</p> <p>13 the suggestion -- again, not to say it's brilliant because</p> <p>14 it's not. It's just good thinking, I think. But I made</p> <p>15 the suggestion and the entire School community loved the</p> <p>16 idea.</p> <p>17 First of all, we have to create courses and</p> <p>18 we call them readiness courses. There's Readiness for</p> <p>19 Keystone math, Readiness for Keystone science, and</p> <p>20 Readiness for Keystone ELA for students who enter our</p> <p>21 School who clearly are not ready to pursue a Full Keystone</p> <p>22 course experience.</p> <p>23 The second part of this is to put into</p> <p>24 motion, which we have done that -- and, again, not to</p> <p>25 contradict what Mr. Castro said, but he doesn't know --</p> <p style="text-align: right;">246</p>
<p>1 because of the fact that, you know, the 2014 results were</p> <p>2 nothing that anybody was proud of whatsoever. We were very</p> <p>3 disappointed in that.</p> <p>4 But the spring -- the spring cohort is</p> <p>5 basically everybody who's in a course or needs to take the</p> <p>6 test and so forth. It's a much larger group of students.</p> <p>7 You do not have as much flexibility as to who takes it in</p> <p>8 the spring and who doesn't.</p> <p>9 What this is basically saying is that our</p> <p>10 process of qualifying and adapting the curriculum to meet</p> <p>11 the needs of the students proved to be very successful, and</p> <p>12 that's why we say it's preliminary because there's not that</p> <p>13 many students involved here.</p> <p>14 The other part that makes this, I think --</p> <p>15 and I want to be fair about the comparison -- is that it's</p> <p>16 not a really completely fair comparison because of the 2014</p> <p>17 spring cohort included an awful lot of students who were</p> <p>18 placed in Algebra 1 and, therefore, were required to take</p> <p>19 -- or biology, but in Algebra 1 specifically they were</p> <p>20 required to take the Keystone exam, but they should never</p> <p>21 have been placed there in the first place, so their</p> <p>22 placement was incorrect.</p> <p>23 But as many schools, I can attest to you,</p> <p>24 lots and lots of schools, kids end up in courses that are</p> <p>25 trigger courses, it's called, the ones that the State says</p> <p style="text-align: right;">245</p>	<p>1 part of the orientation process is placement tests in math,</p> <p>2 ELA and science. Every student who is enrolled must come</p> <p>3 to orientation with their parents.</p> <p>4 We put into effect beginning last -- well,</p> <p>5 August, I guess, is the first time we did it -- this</p> <p>6 process of putting and getting as timely as possible</p> <p>7 placement information on our incoming learners and looking</p> <p>8 at the placement information, plus any records we have,</p> <p>9 which is sometimes we have transcripts, sometimes we don't.</p> <p>10 We also ask the parents to bring former report cards, I</p> <p>11 mean, virtually any data that we can get.</p> <p>12 We then place the students and, as</p> <p>13 indicated in the report -- I know you're going there --</p> <p>14 into sort of three different levels they can go, the</p> <p>15 highest of which would be the Keystone course.</p> <p>16 Q. Can you go to Page 14, please, the top</p> <p>17 bullet point? It's about Classroom Diagnostic Tools.</p> <p>18 A. Um-hum.</p> <p>19 (Witness complies.)</p> <p>20 Got it.</p> <p>21 Q. Now, when you talk about these placement</p> <p>22 tests, are you talking about the classroom diagnostic tools</p> <p>23 or are you talking about something else?</p> <p>24 A. I'm talking about something else. And I</p> <p>25 have to say, you know, when we included the amendment, I'm</p> <p style="text-align: right;">247</p>

<p>1 very open about the fact that the nature of the test is</p> <p>2 weak right now, but it was a first effort.</p> <p>3 The problem with using classroom</p> <p>4 diagnostics, I'd love to do that or, even better, have</p> <p>5 classroom diagnostic data from when the students were in</p> <p>6 8th grade, their prior ones. Again, we don't have access</p> <p>7 to that either.</p> <p>8 Classroom diagnostics would give us a very,</p> <p>9 very accurate picture of where they are in these different</p> <p>10 fields and, consequently, we'd have a lot better way of</p> <p>11 doing it. The problem is they cannot take a classroom</p> <p>12 diagnostic until they are enrolled. They get a PA secure</p> <p>13 ID from PDE, and they're added to the roster through Data</p> <p>14 Recognition Corporation.</p> <p>15 So it would be nice to have them come in</p> <p>16 for orientation and say, sit down in front of the screen,</p> <p>17 you're going to take a classroom diagnostic that will take</p> <p>18 15 minutes. It doesn't happen like that.</p> <p>19 So what my staff and I did is we searched</p> <p>20 -- and I got the Department leaders last summer -- across</p> <p>21 the country, what are people using as placement exams, and</p> <p>22 we created our own.</p> <p>23 And I understand it's not like being --</p> <p>24 having either a State assessment or -- what do you call it</p> <p>25 -- a commercially available one that's been tested for</p> <p style="text-align: right;">248</p>	<p>1 Q. There's a data issue?</p> <p>2 A. Right.</p> <p>3 Q. Meaning there's a lack of data about their</p> <p>4 academic performance?</p> <p>5 A. Right.</p> <p>6 Q. Other than transcripts?</p> <p>7 A. Right.</p> <p>8 Q. And in response to that lack of data and the</p> <p>9 standardized test scores you were seeing, you developed</p> <p>10 your own internal assessment?</p> <p>11 A. Right. If I can just follow up with one</p> <p>12 thing on that, though?</p> <p>13 Q. Sure.</p> <p>14 A. Once we used that and we place the</p> <p>15 students, then in September the goal was -- and I think we</p> <p>16 got it done by October -- we gave everybody CDT's, and we</p> <p>17 used that to confirm their placements. But we had to get</p> <p>18 them on the enrollment rolls before -- and uploaded to</p> <p>19 CDT's before we could actually use that. So we used CDT's</p> <p>20 to confirm what our placement tests had suggested.</p> <p>21 Q. So just so we're clear, can you describe --</p> <p>22 you may have said this already and I apologize. Can you</p> <p>23 describe the CDT, what is it, how is it related to Keystone</p> <p>24 tests?</p> <p>25 A. What happens is the student actually gets a</p> <p style="text-align: right;">250</p>
<p>1 reliability, validity and all that kind of stuff, but it</p> <p>2 was a first really important endeavor to say that we want</p> <p>3 to test all of the students coming into our environment so</p> <p>4 that we can better place them and better attend to their</p> <p>5 individual needs.</p> <p>6 One of the ideas I had for that, if you</p> <p>7 want to know, is the first school I taught at was a</p> <p>8 Catholic school, 9 to 12. It had all kinds of feeders.</p> <p>9 Part of the process is you first took an entrance exam, and</p> <p>10 then if you were accepted based on the entrance exam, which</p> <p>11 they created -- I don't know where they got it, I can still</p> <p>12 remember taking it, too -- then you came back a month later</p> <p>13 and took a placement exam. And if you didn't score well</p> <p>14 enough on the placement exam, you had to go to summer</p> <p>15 school before you got in.</p> <p>16 We're not going to go that route, but the</p> <p>17 idea of getting reliable, timely information was definitely</p> <p>18 one of the keys here and then having the flexibility in our</p> <p>19 program to have different levels of courses very consistent</p> <p>20 with RTII types of ideas with our readiness courses being</p> <p>21 the core and moving up to, you know, full-blown Keystone</p> <p>22 level courses. Those are the two major things we did.</p> <p>23 Q. So to recap a bit, there's an issue with</p> <p>24 data when a student enrolls in your school?</p> <p>25 A. Right.</p> <p style="text-align: right;">249</p>	<p>1 ticket, which a computer prints out for them, and they will</p> <p>2 sit down at the computer, log into it, put the ticket</p> <p>3 number in there, and a test on the anchors for the</p> <p>4 particular Keystone and/or PSSA -- it works the same way --</p> <p>5 will be given.</p> <p>6 Now, the test generally has only about 30</p> <p>7 items on it, but one of the real values of CDT's is it's</p> <p>8 called dynamics from the standpoint that if a student</p> <p>9 misses, say, two of the same kind of question, it will</p> <p>10 change the nature of the questions to go deeper on that to</p> <p>11 the point that the report that you get for individual</p> <p>12 students and for groups -- which as Principal and as a math</p> <p>13 guy, I really liked the idea of getting it for groups as</p> <p>14 well -- it will tell you, for example, that there are</p> <p>15 weaknesses, say, for instance, in 7th grade math and here</p> <p>16 they are. It really is very diagnostic in terms of where</p> <p>17 are the weaknesses, where are the strengths, all reported</p> <p>18 in the reporting categories for the particular subject. So</p> <p>19 it's a very, very useful tool.</p> <p>20 Q. So every student at I-LEAD Charter School</p> <p>21 takes the CDT now, is that what you're saying?</p> <p>22 A. Everyone we can catch. Test participation</p> <p>23 is a challenge everywhere, but we do our best. We do</p> <p>24 make-ups and that type of thing, but the goal is to have</p> <p>25 all of them tested at least twice, probably three times.</p> <p style="text-align: right;">251</p>

1 Q. Can you turn to the other binder, Joint
2 Exhibit 1, please.
3 A. Okay.
4 (Witness complies.)
5 Okay.
6 Q. This is the Charter School's request for an
7 amendment to its Charter.
8 A. Got it.
9 Q. Were you involved in creating this document?
10 A. Parts of it.
11 Q. Can you identify which parts?
12 A. The academic Performance Goals.
13 Q. And you're referencing Paragraphs 11 through
14 18?
15 A. Yes.
16 Q. There was testimony earlier or questions
17 asked of Mr. Castro regarding Paragraph 13, specifically
18 little (a) in Paragraph 13 where it says, the State's shift
19 to Pennsylvania Core Standards has resulted in a, quote,
20 resetting of baseline academic data. What is meant by
21 that?
22 A. What is meant by that is, first of all,
23 based on sitting here earlier, I want to say that statement
24 is true. It does not apply to keystones, but it's true.
25 That saves you a question; right?

252

1 What happened is that the PA Academic
2 Standards were revised into the PA Core Standards, which
3 was a refinement of the National Common Core Standards that
4 were adopted -- I forget how many years ago now -- that
5 significantly changed the nature of the PSSA such that all
6 baselines for the PSSA had to change.
7 And in addition to that, because it changed
8 it both in terms of the content that was being assessed,
9 but the rigor of the assessments, is the State did not
10 provide school performance profiles for any K to 8 schools.
11 So the only school performance profiles you could get was
12 for high schools that had given the Keystone exams.
13 Now, the shift that's listed there, I
14 shouldn't have probably indicated that -- the impression I
15 gave is that it impacted us right away. It won't, you
16 know, in this current school year because the change was on
17 students that we don't have yet. The change will impact us
18 and every other high school from the standpoint that, for
19 example -- this is absolutely true and I can get you
20 citations for it -- 2014, approximately 77 percent of the
21 students in the State of Pennsylvania scored proficient or
22 advanced on the 7th grade math PSSA. That is one of the
23 reasons why the State wanted to go to the PA Core because
24 proficient and advanced didn't make a whole lot of sense
25 anymore.

253

1 It was actually about 50 percent of those
2 7th graders -- this is across the entire State, all kinds
3 of schools -- 50 percent were advanced. Well, now all
4 those categories don't mean anything anymore because they
5 -- all of a sudden they gave a test from last year, for
6 example, I think it was only about 15 percent were
7 advanced. So it was such a shift in the PSSA process that
8 there were no SPP's for it, School Performance Profiles.
9 The second part is the at-risk students,
10 and we've heard lots about that. So it's all very much
11 true.
12 Q. Well, the second part, I think you're
13 referring to the part after the little (b)?
14 A. Yes.
15 Q. Is this, in your mind, a justification for
16 requesting a change or an amendment to the Charter
17 regarding academic goals?
18 A. Absolutely.
19 Q. Why is that?
20 A. Well, my impression -- and I might be
21 wrong, but I'll speak as honestly as I can -- is that the
22 School District, like lots of educational entities, would
23 like to think that the SPP is a really good way of
24 evaluating schools. And I have to say here on the record
25 -- and I would say this to the Secretary of Ed -- I think

254

1 it is an incredible improvement to what they were doing.
2 Under AYP, which is Annual Yearly Progress,
3 they were comparing the results from one test one year to
4 one test the next year. It's just an awful way of
5 evaluating schools. There was like nine ways you could
6 make AYP, which really sounds like it ought to be a song,
7 but it's such a silly system.
8 What the SPP does is it gives credit for
9 performance, for growth, for participation in AP exams, a
10 whole slew of more and other descriptors, and I think it's
11 really good. However, I also would say -- and, again, I
12 would say that to my old PVAAS colleagues and anybody in
13 the State -- one size never fit all. And if you don't have
14 -- if you have a comprehensive high school with a fairly
15 wide variation of the kinds of learners that are there, the
16 SPP is not a bad measure at all.
17 If, on the other hand, you have a much more
18 homogeneous group, either at the bottom or the top, I don't
19 think it's as good a measure. So, consequently -- for
20 example, our PVAAS report -- and, again, this can be
21 verified -- our PVAAS report for last year on the growth in
22 Algebra 1 was based on 61 students.
23 I think it's patently unfair to judge the
24 growth that we created in our environment on the basis of
25 those 61 students. And I'm not making an excuse for the

255

1 fact that they didn't show the growth we wanted, but the
2 point is because of the data structures that are there,
3 merely using an SPP score or either the achievement or
4 progress based on almost slightly over 10 percent of our
5 population, isn't fair.

6 The motivation for the amendment from the
7 academic standpoint was -- and I remember saying this at
8 the news conference -- it was not intended to relieve us of
9 any accountability. Rather, it was to suggest that, given
10 our population, growth should be the foundation of how
11 we're being measured, and we suggested that the growth be
12 calculated based on the growth in those sort of three tiers
13 that we suggested; that is, if the students actually do
14 take the Keystone exam, then, absolutely, all the measures
15 on the SPP make eminent sense.

16 But if they're not there, well, then let's
17 evaluate the growth in the readiness courses, let's
18 evaluate the growth in --

19 Q. I'm going to get there in a minute.

20 A. Good. Sorry.

21 Q. Is it your view that -- I'm just going to
22 try to recap some of what you said. You said, in your
23 view, the school has a homogeneous population, the SPP
24 measure is not very good.

25 A. Right.

256

1 Q. Does I-LEAD Charter have a homogeneous
2 population and, if so, in what sense?

3 A. Well, homogeneous might be too strong a
4 word. Let's say a less -- it's a less diverse population
5 in the fact that almost all of the kids, I mean, high 90's,
6 are economically disadvantaged, high 90 percentages are
7 minority, many of them come in with very dubious records,
8 some no records at all.

9 One of the issues that we have and, again,
10 this is a data issue, is the fact that many of the learners
11 that we have turn out to be Special Ed students and we have
12 no way of finding that out until they announce it. So it's
13 just a tough, tough environment that way in terms of what
14 you see.

15 Q. Direct your attention down to Paragraph 15.

16 A. (Witness complies.)

17 Um-hum.

18 Q. Can you explain what's going on here --

19 A. Yes.

20 Q. -- and being requested in Paragraph 15?

21 A. There are basically -- that lists the
22 courses that were introduced or refined this year to
23 address the nature of the incoming learners that we have.

24 The lowest level is the Readiness for
25 Keystone courses. Then we have beginning ones, that is,

257

1 again, in an RTII sense. The readiness courses are for
2 students that need significant intervention to change if
3 you want their projection for success. These courses deal
4 with an awful lot of preliminary pre-Algebraic types of
5 content, sometimes arithmetic.

6 The next level up is basically spreading,
7 if you want, the content of a, you know, Keystone course,
8 in the case of Algebra 1a and Biology 1a, over two years,
9 slower, more intensive, more support for the students.

10 The English Language Arts 1 and 2, that's a
11 two-year sequence getting to the point of Full Keystone
12 courses, which would be a one-year Algebra 1, World Lit,
13 American Lit, or a full Biology course.

14 Q. In your professional experience, have you
15 seen this type of, I'll call it, tiered system appear
16 anywhere else? Is it utilized by other school entities?

17 A. Just about all of them I've ever dealt
18 with, and not just in Pennsylvania.

19 Q. Do you know any ones in Pennsylvania that
20 currently use this system?

21 A. Yeah, all the ones that I've dealt with
22 this year.

23 Q. Such as who?

24 A. Hazleton, Scranton, what was the name of
25 the one out west? I forget. Harrisburg tried to do it. I

258

1 don't know if they pulled it off. It's basically the idea
2 of creating your sequences so that you meet the students
3 where they are. And in the case of I-LEAD, because we
4 begin at 9th grade -- and this is something that we say in
5 PVAAS land is that basically you can't control how the kids
6 come to you. We can only control what we do with them.

7 So, consequently, having this kind of a
8 system here where some schools would say we have
9 pre-Algebra and we have, you know, 1a and we have a full
10 Algebra, that kind of thing, the name isn't necessarily
11 there, but the idea is by the time students get to 9th
12 grade, you really have to differentiate not so much the
13 content -- this is sort of my philosophy -- you don't
14 necessarily differentiate the content, but you
15 differentiate the way it's taught and its pacing and what
16 kind of support they need.

17 Q. You said that this system is in place at
18 I-LEAD currently?

19 A. Yes.

20 Q. Are you finding that there are more of one
21 type of course that needs to be offered than another?

22 A. Yes, absolutely.

23 Q. How many Full Keystone courses are you
24 offering?

25 A. I'll speak -- Algebra is probably the

259

1 easiest one to talk about. There's one full-blown Algebra
2 1 course.
3 Q. And that's based off placement done with
4 internal assessments?
5 A. Right.
6 Q. And in addition to internal assessments, do
7 you also utilize any previous academic data you can find?
8 A. If we have it, yes. We also would use
9 CDT's once the course is up and running.
10 Q. And then how many readiness courses?
11 A. We have four Readiness for Keystone math
12 courses, and we have, I think, five Algebra 1a's.
13 Q. So based off your assessments and review of
14 data, you have to place four times as many students in
15 readiness courses than Full Keystone courses?
16 A. Absolutely. And the only thing I would
17 add, which you probably wouldn't know to ask, is we're
18 already planning next year that there will still probably
19 be only one -- assuming we have a next year, I probably
20 should say -- we still have only one full Algebra 1,
21 probably three 1a's, and probably six readiness courses.
22 Q. If you turn the page, Paragraph 16 at the
23 top.
24 A. (Witness complies.)
25 Yep.

260

1 Q. 17 appears to be a PD paragraph. Let's walk
2 through that.
3 A. The idea is, again, in 17 what we're saying
4 is that -- you know, we start out with saying the current
5 formula for the SPP, which, again, you can get that from a
6 document itself for a detail for any school in the State,
7 so that's publicly available.
8 It's based only on students who took the
9 Keystone exams in the current year. That is not a
10 reflection of everything that the school is doing. And I
11 suggest that's true of Reading School District just as much
12 as it is I-LEAD, probably more acutely for us, but it's
13 also, I think, unreasonable there.
14 And actually, Secretary Rivera, the State
15 Secretary of Education, when he was at Columbia School
16 District, which is a very sort of blue collar, diverse kind
17 of a school district, he even admitted that the SPP is
18 probably not the best tool. It doesn't have enough
19 intuitive information about the population and so on. So
20 all of these things --
21 MS. PETERSEN: Objection. Hearsay.
22 HEARING OFFICER: Sustained.
23 THE WITNESS: Well, I can get you
24 citations.
25 MS. PETERSEN: He sustained the

261

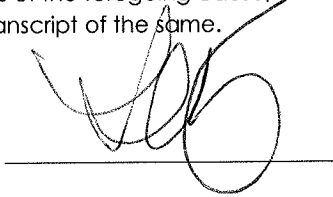
1 objection.
2 BY MR. STACEY:
3 Q. Am I correct that Paragraph 17 and its
4 subparagraphs, the intent here is to break out those
5 various tiers, those three tiers, Readiness, Beginning
6 Keystone, and Full Keystone, and assign an accountability
7 measure to each?
8 A. That's exactly the intention.
9 Q. If you turn the page to 18, can you
10 basically say what's going on in 18?
11 A. Well, in 18 the issue is because we were
12 talking about measuring improvement or growth each year in
13 those three levels, we have to establish a baseline for
14 them.
15 And the issue is we obviously have a
16 baseline, if you want, for the full keystones in the fact
17 that we do have Keystone history. We suggested using this
18 year's CDT data as the baseline data for that intermediate
19 level, and then pre and post test differences as the
20 baseline for the readiness courses, recognizing -- and here
21 we're basically saying we're going to use this data this
22 year to establish the baselines, but one of the things on
23 our list is to improve those incoming exams and work on
24 that basis as well.
25 Q. Thank you. Can you turn to Exhibit 2?

262

1 A. Um-hum.
2 (Witness complies.)
3 Q. I want you to turn to Page -- I guess it's
4 Page 5 -- it's Page 3 of 12 of the proposed Charter
5 Agreement.
6 A. (Witness complies.)
7 Okay.
8 Q. 2014. Do you see the paragraph that says
9 Academic Performance?
10 A. Um-hum.
11 Q. The second sentence says, The Charter Board
12 further agrees that the Charter School's percentages of
13 students scoring advanced or proficient on each of the
14 Keystone exams shall increase by four percent each year
15 during the Renewal Term.
16 Based on your observations as a math
17 consultant, Principal, and working with the students at
18 I-LEAD Charter School and evaluating the academic data, do
19 you think that's an appropriate standard to hold the school
20 to?
21 MS. PETERSEN: Objection. Relevancy.
22 It's been established that it has never been adopted by
23 any Board.
24 HEARING OFFICER: I'm going to allow it.
25 I'd like to hear his response.

263

<p>1 THE WITNESS: I think it's completely 2 inappropriate. The reason for it is this. I think it's 3 inappropriate to make those sorts of metrics for any 4 educational institution, not just I-LEAD, but I-LEAD in 5 particular. And I mean this sincerely about all schools. 6 The issue is if you're going to say that, 7 given you're giving a discrete test, so let's say we take 8 the Keystone Algebra I. I could have, as it happens, a 9 particular mix of kids that go in there and just crank on 10 that test. And let's say it turns out 70 percent of them 11 are proficient or advanced. 12 The next group that comes up has no 13 relevance to what those prior ones performed. So, 14 consequently, they could be very, very hard workers, and 15 they could have come from huge deficits and come up and 16 only 40 percent of them score proficient or advanced. 17 So using a metric like this you would say 18 that school is a disaster, they went from 70 percent 19 proficient down to 40 percent proficient, and they're not 20 comparing the same students. That kind of thing makes 21 eminent sense in a PSSA consecutive year kind of system 22 where you have those students, and if you've got your 23 students -- pardon me -- but if you've got your students, 24 say, for instance, 70 percent proficient or advanced in 25 5th grade math and they all come back to 6th grade, you'd</p> <p style="text-align: right;">264</p>	<p>1 talking about the School District, there have been 2 changes in regulations and all the things this gentleman 3 has pointed out apply equally upon the school. 4 So one of the things -- you know, I'm 5 just sort of telegraphing here what would be helpful for 6 me because I have one theory that's thrown out by the 7 School District of a measurement, I have what you've 8 proposed as a measurement. You guys didn't agree on it. 9 If you guys can't come to an agreement, what I'm going to 10 have to look is what do we got here. 11 So just be forewarned -- and I want to 12 say this early enough -- is I have an appreciation for 13 both the arguments I think that you guys are pointing out 14 here, but in the absence of a clean, clear Charter that 15 gave directions of what we're supposed to do or the 16 absence of accepting an amendment or criticizing an 17 amendment or accepting this, what are we doing here? 18 It would help me tremendously in 19 reviewing this information -- try to feed me that type of 20 information, that understanding. I don't know if that's 21 clear. 22 MR. STACEY: I thought you said the 23 answer, which is building a record. 24 HEARING OFFICER: Well, we are building a 25 record, but I'm just saying keep doing that. I mean,</p> <p style="text-align: right;">266</p>
<p>1 like to think that you would get at least 70 percent, 2 maybe 74, maybe 75, whatever, but the issue is here we're 3 talking about totally different, discreet groups of kids 4 coming through and comparing their performance to the 5 prior classes, the prior cohorts, just -- it doesn't make 6 any sense. 7 BY MR. STACEY: 8 Q. Later in that paragraph on the next page, 9 Page 4, one of the proposed terms is that the Charter 10 School meet PVAAS. Is a commitment to meet the growth 11 measure in each grade an appropriate standard, in your 12 view? 13 MS. PETERSEN: Same objection. 14 HEARING OFFICER: This time I'm going to 15 allow -- I think I got the understanding of what this 16 gentleman's testified to, and I don't need to belabor on 17 this. 18 I will say this. This is a late hour and 19 just sort of -- just as an aside, this is interesting 20 stuff. One of the things that would be helpful here -- 21 because we can speculate as to standards -- but what we 22 do have and what was or wasn't in the Charter -- I'm 23 sizing this up now. 24 But we do have a record here, and the 25 reality is whether you're talking about I-LEAD, you're</p> <p style="text-align: right;">265</p>	<p>1 we've had a lot of testimony today about what someone 2 wants or what someone proposed or what someone counter- 3 proposed or what the Charter did or didn't say and all 4 that other stuff. We can't undo that, whatever happened, 5 happened. 6 But right now what I'm hearing is we need 7 a measure for academic measurement. Okay, I get that. 8 Well, what I heard this gentleman just say is in 9 Paragraph 15, we've got to establish a baseline. I 10 understand that. We've had three years in the past so 11 are we just not going to measure that, or how do we 12 understand that? 13 And I understand all the difficulties 14 that's been said to date about why an apples-to-apples on 15 the PSSA's shouldn't take place. I get it. I think he 16 has done a very nice job of explaining that. 17 But one of the things I was trying to 18 think about here is in analyzing this issue as to what 19 should be the academic standard is, are we simply saying 20 we're not doing anything in the prior years? That would 21 be helpful information for me to understand. I'm not 22 saying it has to be -- 23 MR. STACEY: Do you want an answer? What 24 are you asking for? 25 THE WITNESS: I can make one comment for</p> <p style="text-align: right;">267</p>

<p>1 you. Again, it's probably not proper procedure, but as 2 long as I've been in high school and as long as there's 3 been State testing and every State I've been involved 4 with, the biggest problem for high schools is there's 5 only one test and it tests everybody basically in a 6 chronological sense.</p> <p>7 So, consequently, when the 11th grade 8 PSSA was in place, there was no uniform information for 9 9th grade teachers, 10th grade teachers, only you had 10 just this 11th grade target. And people came up with all 11 sorts of different ways of doing it.</p> <p>12 It's not dissimilar for Keystone. And 13 the concern I have is the fact that -- sort of the 2014 14 hundred percent proficient goal that AYP had or No Child 15 Left Behind, I'm afraid that's being, you know -- 16 currently it's being rethought in Pennsylvania, that we 17 have to have this number proficient or advanced on these 18 three Keystone exams.</p> <p>19 This is, again, not necessarily 20 testimony, but I received an e-mail this morning and, 21 yes, it's hearsay, but the Senate --</p> <p>22 MS. PETERSEN: Objection. 23 HEARING OFFICER: Am I hearing your 24 testimony to say, as to what you're suggesting as part of 25 the amendment of the academic standard to be -- is to</p> <p style="text-align: right;">268</p>	<p>1 (Whereupon, the proceedings adjourned at 2 5:35 o'clock p.m.) 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25</p> <p style="text-align: right;">270</p>
<p>1 create a baseline for a current group of students so you 2 have an apples-to-apples comparison to entertain their 3 growth?</p> <p>4 THE WITNESS: Exactly.</p> <p>5 HEARING OFFICER: INstead of focusing on 6 whether we label that group of kids as proficient or 7 advanced, we're really focused on, like you said, when we 8 got them and where they were and how far we got them 9 along by the end of the year. Is that generally it.</p> <p>10 THE WITNESS: Yes. Exactly.</p> <p>11 HEARING OFFICER: I apologize for 12 interrupting.</p> <p>13 MR. STACEY: That's absolutely fine. I 14 think it came at an appropriate time. I don't think I 15 have any further questions.</p> <p>16 HEARING OFFICER: All right.</p> <p>17 MS. PETERSEN: I do, but I assume we're 18 not going to do that until tomorrow.</p> <p>19 HEARING OFFICER: Would it be a problem 20 for you to come back?</p> <p>21 THE WITNESS: I'll be back at 9:30.</p> <p>22 HEARING OFFICER: We said we would go to 23 5:30. SO we will be in recess until 9:30 tomorrow 24 morning, and we can go off the record. 25 (Discussion was held off the record.)</p> <p style="text-align: right;">269</p>	<p>1 <u>CERTIFICATE</u> 2 3 I hereby certify that the proceedings and 4 evidence are contained fully and accurately in the notes 5 taken by me, to the best of my ability, in the 6 proceedings of the foregoing cause, and that this copy is 7 a correct transcript of the same. 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25</p> <p style="text-align: center;">  _____ Lori A. Dilks, RPR </p> <p>Notary Public in and for the Commonwealth of Pennsylvania</p> <p>BERKS COURT REPORTING SERVICE</p> <p style="text-align: right;">271</p>

	90:23, 92:2, 97:10, 97:11, 97:19, 99:16, 102:17, 102:24, 103:2, 103:3, 108:4, 108:11, 108:23, 110:11, 116:23, 116:24, 117:4, 117:5, 117:19, 123:14, 124:2, 126:24, 137:16, 156:17, 156:20, 156:23, 156:24, 157:6, 166:16, 169:22, 178:7, 178:10, 178:24, 179:6, 180:7, 180:15, 180:17, 180:19, 188:25, 193:5, 205:24, 206:4, 206:6, 207:13, 215:7, 215:10, 224:16, 224:17, 224:25, 225:1, 230:7, 231:14, 242:4, 242:5, 243:23, 245:18, 245:19, 246:7, 252:2, 255:22, 258:10, 258:12, 260:2, 260:20,	264:8 1.2.B [1] - 215:6 10 [37] - 1:24, 19:12, 21:10, 45:2, 45:4, 46:25, 47:4, 47:7, 47:10, 47:16, 49:21, 50:1, 50:3, 50:9, 50:13, 50:15, 51:8, 74:23, 94:22, 94:24, 95:19, 95:23, 96:9, 96:10, 96:13, 96:16, 109:9, 110:9, 110:16, 112:3, 174:10, 176:19, 177:2, 241:17, 241:20, 242:16, 256:4 100 [2] - 28:7, 28:12 1099 [1] - 218:5 10th [22] - 25:23, 26:22, 48:4, 58:19, 84:23, 93:4, 93:21, 101:1, 101:5, 116:17, 117:12, 166:22, 167:3, 167:9, 167:13, 168:7, 168:19,	169:12, 171:9, 171:18, 171:25, 268:9 11 [8] - 50:15, 100:1, 108:18, 108:22, 177:10, 177:18, 206:8, 252:13 11:30 [1] - 76:16 11th [35] - 25:23, 26:22, 48:3, 58:19, 84:11, 84:25, 88:23, 88:25, 90:17, 90:22, 91:7, 91:16, 117:7, 167:16, 167:19, 167:20, 168:14, 169:7, 169:8, 169:10, 169:16, 169:20, 169:23, 170:7, 170:16, 170:19, 170:22, 171:3, 225:12, 230:15, 230:25, 268:7, 268:10 12 [15] - 28:21, 50:15, 94:25, 109:11, 109:24, 110:6, 131:21, 174:11, 176:21, 220:22, 225:7, 225:10, 226:2,	249:8, 263:4 12:30 [1] - 76:19 12th [24] - 25:23, 26:22, 34:11, 58:19, 84:12, 84:25, 88:23, 88:25, 90:17, 90:22, 91:7, 91:17, 97:12, 98:7, 99:6, 99:10, 117:7, 167:19, 167:20, 168:14, 169:7, 169:8, 169:10, 205:16 13 [7] - 100:5, 207:13, 208:4, 208:5, 208:18, 252:17, 252:18 1301 [1] - 1:13 14 [4] - 28:12, 30:14, 130:20, 247:16 148 [1] - 69:19 14th [1] - 190:22 15 [10] - 2:4, 30:17, 154:1, 210:5, 248:18, 254:6, 257:15, 257:20, 267:9 150 [8] - 68:20, 69:1, 69:6, 69:14, 69:17, 108:10,	180:17, 180:19 153 [1] - 2:8 15th [3] - 123:20, 242:1, 242:2 16 [4] - 7:19, 30:17, 260:22 1601 [1] - 1:18 17 [23] - 30:22, 31:19, 31:23, 32:1, 32:3, 66:21, 84:16, 84:20, 115:3, 116:15, 117:9, 118:18, 119:20, 120:17, 131:24, 132:13, 172:1, 184:21, 193:16, 210:5, 261:1, 261:3, 262:3 17-1720-A [1] - 119:15 17-1723-A [1] - 120:22 17-1729-A [1] - 176:8 17-year-olds [1] - 167:10 1729-A [1] - 10:5 18 [13] - 32:14, 59:16, 60:7, 60:19, 61:8, 61:10, 61:14, 63:12, 252:14, 262:9, 262:10, 262:11 1800 [1] -	1:14 19 [7] - 32:20, 59:16, 61:8, 61:10, 61:14, 70:19 19006 [1] - 1:14 19103 [1] - 1:19 19601 [1] - 6:18 19608 [1] - 1:24 1986 [1] - 78:13 1994 [1] - 78:16 1995 [1] - 79:1 1:30 [1] - 124:15 1:40 [2] - 124:19, 124:21 1a [3] - 258:8, 259:9 1a's [2] - 260:12, 260:21 1st [7] - 39:3, 65:22, 65:23, 220:6, 226:17, 232:1 2 2 [40] - 6:14, 19:8, 23:2, 23:4, 89:12, 90:23, 94:10, 102:17, 102:24, 108:11, 119:11, 119:24, 119:25, 121:18, 121:20, 121:24, 123:17, 130:12, 130:17, 130:22, 130:24,	131:14, 133:5, 137:8, 137:9, 139:7, 139:8, 180:18, 180:22, 188:23, 189:2, 189:4, 189:7, 189:18, 189:23, 220:20, 231:14, 258:10, 262:25 20 [3] - 32:1, 78:20, 154:1 200 [8] - 143:24, 145:3, 145:7, 147:16, 147:24, 183:11 2005 [2] - 79:25, 220:23 2005/2006 [1] - 49:11 2007-2008 [1] - 170:3 2008 [4] - 16:11, 36:9, 36:14, 81:24 2008/2009 [1] - 21:11 2009 [4] - 81:23, 82:4, 82:6, 87:14 2010 [8] - 87:19, 87:22, 92:4, 174:2, 178:14, 179:4, 179:13, 191:24 2011 [14] - 18:7, 37:1, 37:11, 37:24, 100:3, 111:21,	119:7, 144:22, 145:14, 145:18, 182:4, 186:20, 206:12, 220:25 2011/12 [3] - 57:11, 58:16, 98:18 2011/2012 [5] - 18:8, 38:2, 48:21, 52:21, 53:17 2012 [11] - 36:17, 38:2, 39:3, 65:22, 75:1, 75:7, 75:17, 75:21, 184:13, 184:25 2012/13 [2] - 57:11, 58:16 2012/2013 [5] - 18:14, 32:8, 38:12, 52:20, 215:24 2013 [20] - 24:2, 24:4, 36:17, 45:18, 45:20, 45:23, 45:25, 56:25, 57:4, 65:23, 75:16, 75:22, 119:13, 139:24, 148:2, 148:21, 149:4, 149:5, 151:12, 185:25 2013/14 [1] - 141:23 2013/2014 [1] - 38:22 2014 [32] -
1								
1 [73] - 6:5, 23:2, 23:4, 39:1, 45:18, 89:12,								

39:9, 39:12, 39:14, 40:4, 43:2, 43:14, 75:10, 76:3, 78:2, 120:5, 121:1, 130:25, 131:13, 133:6, 133:24, 134:4, 147:21, 150:2, 150:7, 154:23, 154:24, 189:19, 220:10, 239:5, 244:10, 244:20, 244:22, 245:1, 245:16, 253:20, 263:8, 268:13 2014/15 [2] - 122:17, 240:25 2015 [35] - 2:14, 2:16, 6:24, 7:19, 8:3, 11:6, 12:22, 77:22, 122:25, 123:20, 123:22, 123:24, 125:6, 132:7, 132:10, 133:20, 134:4, 155:6, 155:8, 156:6, 158:12, 159:9, 160:15, 161:12, 162:5, 162:22, 163:5, 163:6, 190:15,	191:25, 192:12, 220:6, 243:16, 244:13, 244:16 2015/16 [1] - 98:23 2016 [3] - 1:5, 6:8, 6:14 2018/19 [1] - 122:17 21 [4] - 1:5, 6:13, 193:18, 220:20 218 [1] - 2:8 21st [2] - 12:22, 104:14 22 [3] - 6:13, 125:23, 133:12 221 [1] - 2:9 23 [5] - 2:14, 2:16, 6:24, 8:3, 137:24 2310 [1] - 1:18 24 [2] - 119:15, 120:21 25 [3] - 28:11, 158:19, 158:25 250,000 [1] - 149:9 26 [2] - 6:13, 159:9 260,000 [1] - 149:16 27 [3] - 174:2, 179:3, 179:12 27th [1] - 94:21 28th [1] - 157:3 29 [3] - 160:1, 160:21, 222:8 3 3 [30] - 48:15,	99:23, 99:25, 111:7, 111:8, 111:11, 121:13, 121:14, 121:15, 121:23, 124:7, 125:2, 125:3, 125:12, 130:15, 130:17, 131:8, 132:6, 133:6, 137:8, 139:4, 139:20, 139:21, 159:18, 181:20, 189:11, 212:20, 218:14, 263:4 30 [4] - 7:16, 119:13, 135:14, 251:6 300 [3] - 108:11, 180:17, 180:21 3000 [22] - 26:3, 26:9, 26:24, 27:2, 27:18, 29:10, 29:11, 30:5, 33:10, 33:17, 61:18, 61:21, 62:4, 62:15, 63:6, 71:24, 72:11, 72:12, 72:17, 72:19, 73:14, 73:15 30th [3] - 148:21, 149:5, 151:10	35 [1] - 2:4 37 [2] - 30:13, 220:20 3rd [2] - 225:11, 239:2 4 4 [30] - 8:3, 22:25, 44:5, 51:11, 52:12, 52:17, 53:8, 54:4, 56:3, 56:4, 56:21, 59:12, 68:1, 68:13, 96:23, 96:24, 97:4, 102:20, 105:4, 105:22, 113:7, 125:23, 131:18, 133:13, 140:12, 141:16, 159:21, 210:13, 265:9 40 [5] - 228:7, 228:10, 228:16, 264:16, 264:19 400 [1] - 69:13 401 [15] - 147:23, 147:25, 148:6, 149:7, 149:8, 149:9, 151:16, 151:25, 187:16, 187:22, 188:5, 188:7, 188:8, 188:19, 188:25 4th [2] -	92:4, 117:15 5 5 [32] - 6:14, 6:15, 25:9, 25:14, 26:1, 29:21, 49:5, 53:21, 54:4, 61:17, 73:14, 73:15, 89:15, 89:16, 90:1, 95:13, 97:4, 100:21, 105:4, 105:22, 116:20, 136:4, 136:5, 143:4, 166:13, 169:25, 176:4, 210:8, 214:25, 233:8, 233:12, 263:4 50 [6] - 28:7, 28:9, 28:20, 63:2, 254:1, 254:3 500 [2] - 80:3, 113:8 501c3 [1] - 79:1 51 [2] - 28:11, 28:22 52 [3] - 136:6, 136:8, 136:9 57 [2] - 143:5, 143:10 5:30 [1] - 269:23 5:35 [1] - 270:2 5th [7] -	74:4, 122:25, 123:2, 123:21, 123:24, 125:6, 264:25 6 6 [25] - 2:13, 27:9, 27:12, 27:22, 28:14, 29:22, 56:23, 57:15, 57:25, 58:13, 59:1, 60:18, 61:1, 61:3, 61:7, 61:9, 61:11, 61:14, 94:8, 97:4, 133:6, 173:25, 177:2, 237:23 600 [2] - 80:2, 143:18 61 [2] - 255:22, 255:25 610 [1] - 1:25 62 [1] - 28:8 678-9984 [1] - 1:25 6th [1] - 264:25 7 7 [34] - 2:14, 2:15, 28:18, 29:22, 59:1, 60:18, 61:1, 61:3, 61:7, 61:9, 61:11, 61:14, 97:4, 107:8, 108:12,	111:7, 135:12, 137:17, 140:12, 174:24, 175:1, 177:10, 180:6, 180:8, 181:21, 186:23, 213:17, 215:13, 215:15, 215:23, 218:12, 232:23, 239:21, 239:25 70 [7] - 228:4, 228:7, 228:16, 264:10, 264:18, 264:24, 265:1 70th [1] - 65:10 71 [1] - 2:5 74 [2] - 2:5, 265:2 75 [7] - 2:6, 28:11, 28:22, 97:12, 98:7, 99:9, 265:2 76 [3] - 2:6, 28:12, 217:1 77 [2] - 2:7, 253:20 7th [3] - 251:15, 253:22, 254:2 8 8 [12] - 2:16, 6:14, 97:5, 119:9, 120:5, 120:25, 140:12, 215:3, 216:21, 231:17, 233:9, 253:10 800 [2] -	1:8, 6:18 80th [1] - 65:8 81 [2] - 216:4, 216:14 85 [5] - 26:9, 26:18, 214:6, 216:14, 216:15 88 [1] - 28:20 8th [11] - 27:20, 130:24, 143:24, 145:3, 145:7, 147:17, 147:25, 183:11, 225:13, 229:10, 248:6 9 9 [26] - 6:8, 6:14, 30:13, 50:15, 94:25, 95:19, 95:23, 96:9, 96:10, 96:13, 96:16, 109:11, 109:24, 110:6, 110:9, 110:16, 110:19, 123:17, 131:21, 174:11, 176:20, 205:15, 225:6, 226:2, 241:14, 249:8 90 [3] - 54:10, 214:7, 257:6 90's [1] - 257:5 90th [1] - 65:5 92 [3] -	54:13, 54:21, 56:10 95 [1] - 214:8 99 [2] - 198:9 9:30 [4] - 1:5, 6:15, 269:21, 269:23 9th [33] - 25:23, 26:22, 34:11, 48:5, 54:14, 58:19, 74:5, 84:23, 93:21, 101:1, 101:5, 117:12, 166:22, 167:3, 167:9, 167:12, 168:6, 168:19, 169:12, 171:9, 171:25, 229:7, 229:9, 229:13, 229:18, 230:1, 230:3, 230:9, 259:4, 259:11, 268:9 A A's [2] - 201:18, 220:25 A-H-E-R-A [1] - 146:5 A-M-P-R-E -Y [1] - 162:11 a-M-P-R-E- Y [1] - 162:12 a.m [3] - 1:5, 6:15, 76:16 abilities [1] - 58:25 ability [10] - 5:16,
--	--	--	--	--	---	--	--	--

28:2, 30:4, 50:23, 50:25, 83:9, 110:1, 128:13, 271:5 able [13] - 5:16, 11:11, 27:15, 84:24, 108:1, 111:14, 112:1, 141:6, 144:13, 168:11, 168:22, 199:22, 200:10 absence [3] - 236:12, 266:14, 266:16 absolutely [19] - 33:9, 35:4, 35:5, 73:3, 82:14, 113:24, 119:6, 142:12, 145:3, 151:14, 230:25, 236:23, 246:9, 253:19, 254:18, 256:14, 259:22, 260:16, 269:13 abuse [1] - 194:13 academic [81] - 12:25, 23:17, 27:25, 29:16, 29:17, 33:13, 33:19, 34:5, 43:12, 44:3, 44:17, 48:2, 58:24, 86:17,	91:24, 96:10, 99:3, 99:4, 100:2, 100:4, 100:7, 100:8, 100:11, 100:17, 100:20, 101:5, 101:8, 101:14, 101:24, 101:25, 102:15, 104:4, 104:16, 105:11, 106:11, 106:20, 107:5, 112:16, 113:10, 116:11, 125:25, 126:3, 127:2, 127:19, 128:23, 129:3, 129:4, 129:20, 130:3, 133:10, 134:3, 134:13, 135:4, 135:7, 135:8, 169:9, 192:18, 194:6, 194:11, 202:13, 202:20, 203:9, 206:11, 206:14, 208:2, 209:14, 209:17, 209:25, 232:18, 237:22, 250:4, 252:12, 252:20, 254:17, 256:7, 260:7, 263:18, 267:7,	267:19, 268:25 Academic [35] - 18:14, 18:21, 20:2, 23:23, 25:10, 25:18, 30:11, 30:16, 36:23, 38:8, 39:3, 41:6, 42:20, 44:20, 46:12, 57:21, 70:14, 97:5, 97:7, 97:10, 97:11, 97:16, 97:19, 125:15, 129:17, 169:22, 213:22, 215:7, 215:10, 220:3, 235:19, 238:1, 240:4, 253:1, 263:9 academica lly [7] - 25:20, 74:2, 106:7, 106:24, 112:11, 195:11, 226:25 accede [1] - 128:19 accept [1] - 96:14 acceptabl e [2] - 122:15, 151:23 acceptanc e [1] - 20:5 accepted [2] - 145:2, 249:10 accepting [2] - 266:16,	266:17 access [6] - 26:23, 42:11, 42:18, 225:23, 225:25, 248:6 accordanc e [1] - 176:7 according [4] - 64:11, 116:3, 199:16, 214:8 accordingsl y [5] - 33:22, 33:23, 73:23, 74:1, 126:4 account [1] - 102:3 accountab ility [6] - 122:4, 122:14, 122:22, 123:8, 256:9, 262:6 accumulat ing [1] - 194:5 accumulat ion [1] - 67:2 accuracy [2] - 50:19, 240:19 accurate [16] - 10:24, 33:7, 41:12, 45:4, 54:24, 73:16, 94:19, 155:5, 171:5, 171:6, 205:2, 208:19, 217:7, 217:10, 232:13, 248:9 accurately [6] - 35:7, 41:18, 50:23,	172:19, 183:19, 271:4 ACE [6] - 40:8, 79:20, 86:5, 86:6, 86:9, 86:12 achieve [4] - 29:11, 61:23, 62:11, 86:9 Achieve [32] - 26:3, 26:9, 26:23, 27:2, 27:18, 29:10, 29:11, 30:5, 33:10, 33:15, 33:17, 33:20, 41:18, 42:1, 58:7, 61:18, 61:21, 62:4, 62:14, 63:6, 71:24, 72:11, 72:12, 72:17, 72:19, 72:21, 73:14, 73:15, 73:19, 75:1, 79:21, 86:10 achieved [2] - 57:10, 65:1 achieveme nt [3] - 100:15, 106:1, 256:3 achieving [1] - 80:2 acknowled ge [4] - 13:24, 167:23, 168:18, 171:7	acknowled ged [1] - 169:17 acknowled gement [1] - 13:1 acknowled ging [1] - 171:6 acknowled gment [1] - 142:19 acquisitio n [1] - 150:10 acronym [2] - 145:25, 146:3 action [1] - 7:12 active [5] - 41:20, 78:18, 86:12, 129:2, 144:25 actively [4] - 78:17, 88:6, 128:21, 217:21 activities [4] - 18:16, 83:10, 238:13, 238:17 actual [12] - 50:17, 100:14, 112:20, 113:13, 115:5, 115:6, 152:15, 182:14, 184:8, 184:11, 226:17 Acuity [30] - 28:1, 28:7, 28:17, 29:10, 29:15, 30:5, 32:14, 32:15, 33:10, 33:15, 33:17, 33:24, 42:1, 42:3,	56:24, 58:3, 58:7, 58:20, 58:22, 59:2, 59:12, 61:2, 63:9, 63:11, 65:1, 66:1, 70:19, 71:24, 75:1 acutely [1] - 261:12 adapting [2] - 243:8, 245:10 add [3] - 141:8, 194:9, 260:17 added [4] - 95:3, 182:20, 227:4, 248:13 Added [1] - 220:24 Addendu m [15] - 111:12, 181:23, 181:24, 182:3, 182:9, 182:12, 182:20, 183:1, 183:6, 183:14, 183:18, 186:25, 218:15, 218:19 addicted [1] - 194:13 addiction [1] - 106:21 addition [4] - 13:5, 131:22, 253:7, 260:6 additional [3] - 92:11, 96:3, 209:13 additionall y [1] - 4:21	address [11] - 4:3, 9:6, 9:11, 12:24, 13:2, 100:3, 108:1, 137:20, 180:3, 226:5, 257:23 addressed [4] - 8:4, 70:19, 110:18, 183:14 addresses [1] - 9:3 addressin g [3] - 91:21, 107:1, 246:11 adequate [1] - 108:1 adequatel y [2] - 141:1, 172:19 adhere [1] - 126:20 adjourned [1] - 270:1 adjudicate d [3] - 194:12, 203:15, 203:23 Adjudicati on [1] - 7:15 adjudicati on [3] - 9:7, 88:3, 106:22 adjunct [4] - 163:22, 163:25, 164:2, 164:3 adjust [2] - 191:19, 191:25 adjusted [2] - 228:16, 240:23 admin [1] - 237:2 administer [4] - 7:7, 125:20, 133:11,	210:15 administer ed [7] - 33:25, 58:23, 59:9, 61:21, 61:23, 75:2, 98:9 administer ing [2] - 72:6, 72:7 Administr ation [17] - 1:8, 24:25, 25:5, 25:8, 71:6, 71:16, 71:20, 129:3, 129:13, 130:3, 140:4, 142:23, 150:9, 159:23, 160:5, 235:3, 237:19 administra tion [2] - 66:13, 75:3 Administr ation's [1] - 4:5 administra tions [2] - 66:4, 241:24 administra tive [5] - 26:25, 150:2, 237:5, 237:20, 237:21 Administr ative [2] - 6:17, 232:11 Administr ator [1] - 41:1 administra tors [2] - 234:14, 234:19 Administr ators [4] - 235:18,
---	---	---	--	---	---	--	--	---

235:21, 237:8, 237:21 admission [1] - 58:17 admission s [8] - 59:7, 200:12, 201:1, 201:8, 201:24, 201:25, 202:3, 205:19 admit [10] - 102:8, 109:21, 109:23, 167:8, 167:16, 168:11, 168:20, 169:11, 171:9 admitted [1] - 261:17 adopted [7] - 172:11, 174:1, 186:1, 189:7, 189:14, 253:4, 263:22 Adult [3] - 98:12, 105:17, 210:13 adulthood [1] - 104:13 Advanced [2] - 126:6, 133:16 advanced [16] - 98:8, 99:10, 126:19, 199:9, 228:5, 230:6, 253:22, 253:24, 254:3, 254:7, 263:13, 264:11, 264:16, 264:24, 268:17, 269:7 Advancem	ent [1] - 78:25 advertised [1] - 6:8 advertise ment [1] - 8:8 advice [1] - 153:11 advised [3] - 145:2, 150:15, 150:17 Advisory [5] - 16:17, 17:2, 17:6, 136:21, 136:22 advocatin g [1] - 171:15 affect [2] - 136:1, 236:23 affected [1] - 187:2 affidavits [3] - 113:8, 113:13, 113:16 affiliations [1] - 86:14 affirmatio ns [1] - 7:8 afraid [1] - 268:15 African [1] - 198:15 afternoon [3] - 152:21, 152:22, 152:23 afterwards [1] - 185:6 age [10] - 90:19, 91:9, 93:8, 93:23, 117:20, 120:17, 131:24, 174:14, 174:15, 193:15 aged [2] - 100:18, 117:9 agency [1] - 83:13 Agency [3]	- 4:16, 31:6, 31:13 Agenda [2] - 2:14, 2:15 agenda [3] - 6:24, 7:20 aggressiv e [2] - 129:5, 135:8 ago [3] - 220:20, 236:8, 253:4 agree [51] - 45:14, 47:17, 48:20, 50:6, 57:3, 64:13, 69:5, 88:9, 103:14, 122:6, 122:18, 123:7, 123:12, 124:1, 128:9, 157:16, 157:19, 158:9, 159:2, 164:6, 167:1, 167:25, 169:1, 169:2, 170:6, 172:20, 174:5, 176:5, 176:25, 185:24, 186:14, 187:8, 187:19, 188:24, 189:6, 189:10, 189:19, 189:20, 189:24, 190:1, 190:2, 190:3, 192:7, 194:17, 194:20, 195:4,	214:12, 215:9, 216:9, 242:25, 266:8 agreed [6] - 9:21, 10:7, 13:23, 128:5, 128:6, 158:8 agreeing [1] - 190:4 Agreemen t [32] - 13:23, 100:3, 103:19, 107:11, 108:21, 110:12, 111:6, 111:16, 112:3, 125:9, 130:23, 131:2, 133:6, 144:4, 144:7, 145:15, 157:13, 172:19, 174:22, 176:5, 177:13, 180:11, 181:18, 182:7, 183:1, 183:19, 187:5, 187:8, 189:12, 206:12, 206:14, 263:5 agreement [15] - 10:11, 76:18, 79:22, 108:25, 109:1, 109:3, 129:21, 129:22, 149:1, 149:2, 149:3, 175:6, 175:9, 181:13,	266:9 agrees [6] - 122:14, 125:19, 126:5, 133:10, 133:14, 263:12 ahead [3] - 15:13, 19:7, 151:7 AHERA [6] - 146:3, 146:4, 146:6, 146:9, 146:16, 146:23 albeit [1] - 157:13 Algebra [24] - 21:14, 126:24, 223:19, 224:16, 224:17, 224:25, 225:1, 230:7, 242:4, 242:5, 243:23, 245:18, 245:19, 246:7, 255:22, 258:8, 258:12, 259:9, 259:10, 259:25, 260:1, 260:12, 260:20, 264:8 Algebraic [1] - 258:4 algorithms [1] - 227:15 aligned [1] - 238:25 Allison [7] - 1:12, 8:4, 12:12, 120:5, 125:7, 158:4, 192:9 allow [5] - 91:25, 93:12, 93:14,	263:24, 265:15 allowed [5] - 151:20, 165:12, 187:17, 188:19, 204:8 allows [1] - 226:7 alluded [1] - 107:16 almost [9] - 25:21, 26:20, 82:18, 86:19, 171:18, 197:21, 231:4, 256:4, 257:5 Almy [1] - 3:4 alone [1] - 107:6 alternate [1] - 106:4 alternative [4] - 34:10, 113:11, 127:1, 129:6 amazing [1] - 227:12 ambiguity [1] - 169:2 amend [2] - 7:23, 7:25 Amend [1] - 3:16 amended [2] - 131:12, 156:12 amendme nt [34] - 6:11, 9:19, 10:4, 10:19, 10:22, 11:13, 12:21, 13:15, 13:20, 14:5, 14:12, 14:14, 101:8, 105:10, 111:18, 128:22, 135:1,	138:19, 151:25, 152:13, 191:18, 191:24, 192:3, 192:4, 193:6, 206:1, 247:25, 252:7, 254:16, 256:6, 266:16, 266:17, 268:25 Amendme nt [6] - 3:22, 99:18, 132:18, 137:17, 137:18, 137:19 American [2] - 198:15, 258:13 amicable [1] - 192:6 amount [2] - 83:20, 225:7 amplifies [1] - 177:3 Amprey [2] - 162:9 analysis [7] - 16:9, 40:6, 42:6, 62:10, 62:13, 225:18, 234:3 Analyst [13] - 18:14, 18:21, 20:2, 23:23, 36:23, 38:8, 39:3, 41:6, 42:10, 45:16, 57:21, 62:22, 73:6 analyze [1] - 225:17 analyzed [2] - 18:23, 55:2	analyzing [1] - 267:18 anchors [1] - 251:3 AND [1] - 1:5 angel [1] - 159:3 Angel [5] - 24:17, 129:17, 148:5, 222:19, 222:21 announce [1] - 257:12 Annual [33] - 23:10, 24:6, 51:15, 51:17, 51:21, 52:1, 52:8, 52:13, 70:8, 70:10, 139:1, 139:5, 139:19, 139:25, 140:9, 140:21, 141:2, 141:3, 142:14, 212:20, 213:7, 213:10, 213:15, 215:13, 215:15, 215:22, 216:5, 216:22, 233:5, 233:7, 255:2 annually [2] - 58:23, 80:15 answer [17] - 22:3, 38:14, 55:23, 71:10, 170:10, 175:15, 199:22, 200:1, 200:11, 203:24,	208:22, 209:19, 210:16, 210:17, 211:6, 266:23, 267:23 anticipate [1] - 5:21 anticipatin g [1] - 171:2 anyway [2] - 228:12, 246:5 AP [3] - 222:3, 255:9 apologize [10] - 32:22, 33:2, 44:15, 63:5, 70:11, 93:9, 105:21, 243:14, 250:22, 269:11 appeal [1] - 89:6 appear [7] - 19:22, 64:14, 64:23, 109:2, 132:11, 210:10, 258:15 APPEARA NCES [1] - 1:11 appendice s [2] - 95:25, 113:17 apples [6] - 32:17, 32:18, 267:14, 269:2 apples-to- apples [2] - 267:14, 269:2 applicable [5] - 108:14, 110:21, 125:21, 136:2, 209:3 applicant
--	--	---	---	--	--	--	--	--

[1] - 167:1 Applicant [2] - 168:3, 172:6 Applicatio n [5] - 3:16, 17:4, 120:14, 120:21, 177:12 applicatio n [97] - 13:8, 16:18, 16:21, 16:22, 17:2, 17:15, 34:23, 35:15, 35:21, 36:3, 81:19, 82:5, 83:18, 84:4, 84:7, 86:11, 86:21, 86:24, 87:12, 87:15, 87:19, 87:20, 87:25, 88:13, 88:16, 89:2, 89:7, 89:8, 90:2, 90:5, 90:10, 91:20, 92:6, 95:12, 95:14, 95:18, 95:20, 96:7, 96:19, 98:2, 103:11, 103:13, 106:1, 106:5, 106:17, 108:20, 109:8, 109:13, 110:8, 113:9, 113:17,	116:14, 132:25, 134:19, 136:5, 137:2, 137:3, 138:4, 138:7, 143:16, 143:18, 166:5, 166:7, 166:8, 166:9, 166:25, 167:18, 168:1, 168:25, 169:3, 169:4, 169:6, 171:23, 172:7, 173:4, 176:22, 177:19, 178:17, 178:20, 178:21, 178:25, 179:15, 183:25, 184:4, 184:19, 191:15, 191:20, 206:16, 206:21, 207:3, 210:9, 214:14, 215:17, 216:11 applicatio ns [4] - 16:14, 90:12, 105:1, 105:3 applied [2] - 213:3, 241:1 applies [2] - 172:24, 213:1 apply [7] - 31:13, 100:25, 131:22, 194:23, 240:25, 252:24, 266:3 appoint [1]	- 7:21 appointed [1] - 3:5 appointme nt [4] - 7:6, 8:14, 8:25, 73:21 apportion ed [1] - 20:11 appreciate [1] - 4:22 appreciati on [1] - 266:12 apprised [1] - 144:2 approach [3] - 83:17, 111:1, 203:18 approache d [4] - 81:24, 82:9, 148:3, 184:16 approachi ng [1] - 99:9 appropriat e [13] - 7:10, 7:12, 9:4, 13:16, 13:17, 13:25, 14:11, 14:22, 67:23, 244:2, 263:19, 265:11, 269:14 appropriat ely [1] - 195:1 approval [1] - 188:11 approve [1] - 96:7 approved [15] - 6:25, 17:15, 17:17, 96:2, 120:22, 175:6, 175:9, 175:13, 179:1,	179:10, 182:10, 186:12, 206:20, 207:2, 207:8 approxima te [1] - 80:14 arc [1] - 66:15 area [2] - 17:12, 86:12 areas [3] - 97:23, 105:8, 244:4 arena [1] - 17:13 arenas [1] - 83:16 arguments [5] - 8:20, 10:19, 10:22, 11:12, 266:13 arise [1] - 183:7 arithmetic [1] - 258:5 arose [2] - 115:9, 138:9 arrange [1] - 148:23 arranged [1] - 188:8 arrangeme nt [1] - 11:6 arrived [1] - 233:16 Art [1] - 224:9 Arts [4] - 234:22, 238:7, 238:12, 258:10 arts [8] - 28:1, 28:6, 28:10, 28:15, 28:16, 32:16, 56:24, 65:1 asbestos [6] - 144:23,	144:25, 145:24, 146:1, 147:4 Ashoka [1] - 81:4 ASHOKA [1] - 81:4 aside [1] - 265:19 aspects [2] - 11:12, 106:24 assess [4] - 33:12, 60:3, 201:8, 204:7 assessed [2] - 29:18, 253:8 assessing [1] - 104:23 Assessme nt [1] - 220:24 assessme nt [36] - 25:24, 26:3, 27:4, 28:10, 28:15, 28:18, 28:19, 28:21, 28:22, 32:19, 42:12, 56:24, 58:23, 59:9, 59:10, 59:12, 59:18, 60:21, 62:11, 63:18, 65:1, 73:22, 125:22, 133:12, 142:22, 144:23, 202:10, 204:5, 205:22, 222:18, 227:4, 234:5, 236:24, 241:12, 248:24,	250:10 assessme nts [21] - 18:25, 29:10, 33:11, 33:17, 33:18, 41:16, 41:19, 41:20, 41:21, 54:12, 58:21, 72:24, 73:7, 75:1, 104:24, 209:10, 209:11, 253:9, 260:4, 260:6, 260:13 assign [1] - 262:6 assigned [4] - 38:13, 41:19, 46:22, 234:13 assignme nt [1] - 108:17 assistance [1] - 234:2 Assistant [4] - 16:2, 36:7, 39:25, 78:15 assisted [1] - 207:24 assisting [1] - 153:10 Associate s [1] - 12:10 ASSOCIAT ES [1] - 1:17 assume [3] - 51:23, 225:24, 269:17 assumed [3] - 46:1, 175:21, 175:24 assuming [2] - 45:15, 260:19 at-risk [11] -	100:12, 104:11, 109:19, 110:3, 110:4, 112:22, 120:20, 195:15, 195:18, 200:8, 254:9 attached [15] - 7:1, 7:3, 7:21, 52:11, 59:11, 108:21, 123:22, 177:13, 178:1, 178:2, 178:6, 186:25, 188:23, 189:11, 189:22 attachmen t [8] - 103:19, 109:7, 140:1, 178:1, 178:5, 207:6 attack [1] - 233:25 attainment [1] - 100:17 attempt [2] - 122:13, 128:18 attempted [5] - 21:21, 21:24, 104:6, 140:18, 156:13 attempting [5] - 72:7, 90:16, 140:14, 192:6, 201:8 attend [9] - 71:15, 90:20, 91:10, 93:8, 117:7, 150:19, 167:11, 201:22, 249:4	attendanc e [17] - 5:10, 69:3, 72:2, 72:13, 72:14, 93:23, 108:10, 214:5, 215:24, 216:3, 216:6, 216:12, 216:22, 230:18, 236:3, 236:9, 236:11 attended [3] - 47:18, 88:5 attending [4] - 18:18, 90:17, 117:10, 193:23 attention [2] - 224:5, 257:15 attest [1] - 245:23 Attorney [2] - 78:15, 125:6 attorney [10] - 3:4, 78:9, 78:11, 121:6, 128:5, 191:2, 191:14, 206:8, 207:12, 210:9 attorneys [3] - 8:6, 10:14, 123:11 August [14] - 24:4, 78:2, 92:18, 92:20, 120:5, 120:25, 130:24, 131:12, 154:23, 154:24, 189:19, 190:22, 213:2,	247:5 AUN [1] - 111:14 author [4] - 16:19, 30:11, 103:6, 232:14 authored [4] - 23:17, 233:14, 239:24, 239:25 authoring [2] - 44:6, 44:7 authority [1] - 7:13 authorize [4] - 123:10, 138:25, 140:6, 141:23 authorized [4] - 7:6, 128:4, 131:20, 141:15 authorizes [1] - 7:24 automatic ally [2] - 22:16, 198:15 available [8] - 84:19, 161:20, 223:5, 230:12, 230:24, 238:24, 248:25, 261:7 average [1] - 214:5 averages [1] - 67:4 avoid [2] - 122:11, 124:2 award [3] - 81:17, 94:20, 101:15 awarded [6] - 81:2, 81:11, 81:14, 95:11, 103:24, 118:9 awarding [1] - 96:13
---	--	---	--	--	--	---	---	--

awards [1] - 80:24 aware [16] - 6:1, 48:14, 55:6, 56:9, 58:11, 113:23, 113:25, 161:13, 169:20, 206:15, 206:18, 207:7, 209:1, 212:1, 212:6, 212:7 awful [4] - 222:2, 245:17, 255:4, 258:4 awhile [1] - 106:10 axis [8] - 63:16, 63:23, 64:6, 64:7, 64:9, 64:22, 64:23, 68:18 AYP [3] - 255:2, 255:6, 268:14	bar [1] - 205:15 barometer [1] - 197:23 base [1] - 19:3 based [34] - 16:24, 26:8, 27:3, 27:17, 67:23, 74:8, 79:24, 93:10, 95:17, 106:1, 114:12, 120:21, 127:7, 130:8, 134:23, 152:3, 223:1, 224:1, 225:18, 227:6, 228:24, 237:8, 240:23, 242:19, 244:4, 249:10, 252:23, 255:22, 256:4, 256:12, 260:3, 260:13, 261:8, 263:16 Baseline [3] - 126:15, 169:23, 170:2 baseline [22] - 33:19, 61:24, 72:22, 100:11, 169:10, 169:13, 169:18, 169:19, 169:23, 170:16, 170:19, 170:23, 209:17, 239:7, 252:20,	262:13, 262:16, 262:18, 262:20, 267:9, 269:1 baselines [2] - 253:6, 262:22 bases [1] - 58:7 Basic [3] - 98:12, 105:17, 210:13 basis [7] - 80:10, 81:8, 102:5, 196:11, 242:22, 255:24, 262:24 BCIU [1] - 222:24 bear [3] - 34:16, 158:18, 185:21 beat [1] - 200:5 became [2] - 154:12, 171:21 become [3] - 14:4, 85:21, 103:14 beefed [1] - 40:6 BEFORE [1] - 1:3 began [12] - 74:25, 75:15, 75:17, 81:23, 82:3, 89:3, 95:9, 97:19, 98:17, 148:17, 148:22, 150:13 begin [8] - 38:9, 38:24, 119:17, 145:17, 149:21, 150:12, 239:17, 259:4	Beginning [1] - 262:5 beginning [11] - 29:4, 35:13, 114:20, 120:6, 120:9, 130:15, 152:25, 237:11, 238:21, 247:4, 257:25 Begins [1] - 141:18 begins [1] - 30:13 begun [1] - 75:7 behalf [2] - 107:13, 192:10 behavioral [1] - 100:15 Behind [1] - 268:15 behind [4] - 25:20, 34:4, 100:18, 204:10 beings [1] - 104:5 belabor [1] - 265:16 belief [4] - 33:8, 155:20, 190:18, 202:25 believer [1] - 240:3 below [8] - 26:10, 26:19, 28:9, 28:21, 54:14, 55:12, 126:11, 228:9 benchmark king [1] - 223:22 benchmark ks [1] - 127:25 benefit [2] - 5:11, 148:13 Berks [2] -	222:14, 236:5 BERKS [2] - 1:23, 271:15 berkscour treporting @gmail. com [1] - 1:25 best [20] - 22:19, 30:4, 33:7, 50:23, 50:25, 60:2, 61:6, 65:2, 109:17, 179:19, 184:25, 189:17, 205:21, 207:23, 213:9, 224:22, 240:16, 251:23, 261:18, 271:5 better [10] - 14:18, 63:22, 107:23, 128:17, 147:6, 225:17, 248:4, 248:10, 249:4 between [16] - 8:8, 13:11, 37:7, 45:7, 59:19, 62:5, 90:10, 100:14, 113:7, 117:14, 135:17, 135:22, 137:20, 162:22, 197:25, 218:20 beyond [6] - 71:8, 90:19, 91:9, 93:8, 93:23,	134:20 bifurcate [1] - 10:7 big [5] - 19:7, 26:8, 74:23, 149:18, 238:20 bigger [2] - 13:6, 93:13 biggest [2] - 224:13, 268:4 binder [14] - 19:8, 22:22, 22:24, 89:12, 102:17, 102:18, 102:22, 102:24, 121:13, 121:15, 123:14, 130:21, 231:14, 252:1 Binder [3] - 19:8, 23:2, 231:14 binders [3] - 4:25, 12:2, 74:23 bio [1] - 230:8 Biology [2] - 258:8, 258:13 biology [1] - 245:19 bit [15] - 3:15, 11:2, 11:21, 20:4, 23:19, 25:15, 43:6, 101:11, 106:18, 153:3, 156:2, 172:10, 202:2, 225:22, 249:23 black [2] - 32:10, 32:23	blank [1] - 145:25 blanking [1] - 43:3 block [5] - 113:3, 149:12, 242:3 blown [2] - 249:21, 260:1 blue [1] - 261:16 Board [182] - 3:6, 6:25, 7:16, 9:4, 13:3, 13:21, 16:17, 17:2, 17:6, 24:13, 25:5, 25:7, 71:6, 71:17, 77:14, 77:18, 77:19, 77:20, 77:21, 77:24, 77:25, 78:5, 82:6, 83:23, 83:24, 84:5, 87:10, 87:20, 87:25, 88:6, 88:15, 92:13, 92:14, 93:1, 94:6, 95:1, 96:2, 103:16, 103:24, 107:20, 107:22, 107:23, 114:15, 115:2, 115:5, 115:10, 115:11, 117:19, 118:1, 118:9, 119:13,	119:14, 120:22, 122:25, 123:1, 123:3, 123:4, 125:19, 125:24, 126:4, 127:4, 127:9, 127:13, 127:18, 127:25, 129:2, 129:7, 129:13, 129:14, 130:3, 130:6, 133:10, 133:14, 136:16, 136:17, 136:19, 137:3, 137:4, 137:12, 137:24, 137:25, 138:24, 138:25, 140:6, 142:1, 144:16, 144:19, 144:20, 144:21, 145:1, 146:6, 146:8, 146:25, 150:9, 150:16, 152:4, 153:10, 153:13, 154:12, 154:13, 154:14, 154:18, 155:3, 155:5, 155:6, 155:7, 155:11, 155:15, 155:25, 156:6, 156:15, 157:8, 158:1, 158:5,	158:15, 159:22, 160:5, 160:7, 160:16, 160:22, 161:17, 161:22, 161:25, 162:2, 162:8, 162:18, 162:19, 162:21, 162:24, 163:7, 163:9, 163:13, 163:14, 164:6, 164:7, 171:22, 171:23, 172:9, 173:8, 174:1, 175:4, 175:6, 175:9, 175:13, 175:18, 177:2, 177:8, 179:1, 179:7, 179:10, 179:13, 179:20, 179:23, 182:9, 184:9, 184:16, 185:20, 185:25, 186:1, 186:2, 186:12, 189:8, 189:15, 192:5, 192:6, 192:19, 202:4, 204:1, 207:2, 207:7, 207:9, 221:2, 222:3, 263:11, 263:23 board [1] - 157:18 Board's [3]
--	---	---	---	--	--	---	--	--

- 155:21, 175:19, 186:17 Boards [3] - 137:6, 137:22, 163:15 boat [1] - 94:1 Bob [2] - 125:7, 173:23 body [9] - 23:13, 28:12, 29:20, 73:4, 73:16, 94:24, 96:14, 107:24, 174:11 BOHAN [1] - 219:18 Bohan [4] - 2:9, 219:17, 219:25, 220:1 boiled [1] - 224:3 bono [4] - 77:11, 78:8, 153:3, 154:3 books [1] - 193:22 bottom [20] - 22:12, 25:10, 54:18, 56:14, 63:16, 63:17, 63:23, 68:16, 96:24, 97:2, 120:7, 121:18, 121:20, 121:24, 123:17, 133:7, 139:24, 213:21, 215:23, 255:18 bound [1] - 31:7 box [1] - 4:25 break [5] -	76:20, 124:9, 124:23, 212:10, 262:4 breakdown n [1] - 201:11 briefing [2] - 7:17, 8:9 briefly [2] - 84:6, 132:6 brilliant [1] - 246:13 bring [3] - 10:5, 91:16, 247:10 bringing [1] - 184:10 broadened [1] - 101:20 brought [1] - 10:8 Brown [1] - 40:20 budget [4] - 80:14, 80:16, 108:8, 181:2 budgetary [1] - 39:17 build [3] - 91:15, 95:10, 104:9 Building [1] - 1:8 building [11] - 91:23, 108:14, 145:11, 145:18, 148:20, 148:24, 149:18, 150:20, 150:25, 266:23, 266:24 built [1] - 80:1 bullet [6] - 11:21, 97:18, 234:2, 234:13, 238:9, 247:17 bulleted [3]	- 214:4, 214:12, 215:11 bulletin [2] - 236:11, 236:12 burdens [2] - 5:25, 6:1 business [1] - 184:10 Business [1] - 1:13 BY [42] - 2:3, 15:6, 15:14, 17:5, 19:13, 22:5, 23:6, 26:14, 31:24, 33:3, 34:18, 43:9, 44:14, 71:4, 71:14, 73:12, 74:10, 74:18, 76:1, 94:4, 103:1, 105:24, 118:13, 124:25, 128:3, 130:1, 131:9, 143:9, 151:5, 152:20, 157:5, 162:13, 165:16, 206:7, 210:7, 211:10, 217:19, 219:22, 221:18, 229:25, 262:2, 265:7 Byberry [1] - 1:14	77:8 C-L-Y-D-E [1] - 15:17 C.S [1] - 49:7 CAB [1] - 11:5 calculate [2] - 67:3, 67:15 calculated [4] - 67:8, 67:20, 67:21, 256:12 calculatio ns [2] - 30:19, 68:5 calculus [1] - 222:3 canceled [1] - 6:16 candidate s [3] - 239:4, 243:5, 243:25 cannot [19] - 47:11, 47:15, 56:12, 56:17, 57:16, 57:20, 59:23, 60:1, 60:14, 61:15, 62:16, 62:20, 87:4, 87:5, 88:4, 205:15, 208:9, 231:10, 248:11 canvassin g [1] - 112:8 cap [3] - 181:13, 181:14, 181:15 capacity [3] - 142:5, 196:15, 220:18 capital [2] - 24:7 captured [1] - 140:21	cards [2] - 226:23, 247:10 career [1] - 243:23 carefully [1] - 102:15 carried [1] - 7:3 case [21] - 5:25, 9:2, 9:19, 9:20, 11:5, 11:8, 11:9, 11:11, 11:13, 11:14, 52:15, 132:19, 151:24, 153:25, 177:22, 177:23, 201:20, 206:18, 258:8, 259:3 cases [1] - 8:25 Castro [21] - 2:7, 24:17, 76:25, 77:6, 77:8, 93:14, 118:7, 125:1, 127:17, 152:21, 160:13, 165:17, 173:21, 185:24, 191:12, 211:5, 212:19, 219:6, 237:7, 246:25, 252:17 CASTRO [1] - 77:1 catch [1] - 251:22 categories [8] - 194:19, 194:23, 195:1, 195:5, 200:16,	228:2, 251:18, 254:4 category [2] - 200:7, 204:18 Catholic [1] - 249:8 caused [3] - 39:14, 64:4, 209:8 CDT [7] - 238:23, 239:5, 239:10, 244:3, 250:23, 251:21, 262:18 CDT's [7] - 238:23, 243:7, 250:16, 250:19, 251:7, 260:9 ceased [1] - 76:2 cell [1] - 5:13 CELMER [1] - 159:7 Celmer [2] - 129:16, 159:6 century [1] - 104:14 CEO [5] - 78:21, 79:6, 136:18, 159:3, 222:15 ceremony [1] - 150:21 certain [7] - 8:5, 10:17, 110:13, 161:21, 161:23, 180:23, 190:19 certainly [8] - 14:13, 32:24, 33:14, 106:15, 181:14, 190:2, 208:23, 233:15	certainty [1] - 54:9 CERTIFIC ATE [1] - 271:1 certificatio n [1] - 147:4 certificatio ns [3] - 40:15, 146:1, 166:1 certifies [1] - 6:6 certify [2] - 7:14, 271:3 cetera [2] - 214:9 Chair [9] - 77:19, 77:25, 78:5, 154:13, 154:22, 160:12, 160:18, 162:2, 202:4 challenge [3] - 223:1, 224:13, 251:23 challenge d [1] - 79:9 challenge s [8] - 34:2, 34:7, 101:19, 106:16, 141:9, 203:10, 224:11, 225:5 challengin g [2] - 195:8, 223:8 change [13] - 34:1, 39:15, 98:3, 151:18, 154:10, 187:3, 244:8, 251:10, 253:6, 253:16, 253:17, 254:16,	258:2 changed [10] - 30:8, 96:17, 162:4, 228:12, 235:5, 235:13, 237:7, 253:5, 253:7 changes [8] - 13:9, 90:9, 90:10, 156:1, 156:5, 158:5, 224:1, 266:2 Chapter [2] - 125:23, 133:13 character [1] - 104:8 characteri ze [2] - 115:18, 115:20 charge [1] - 232:9 charges [3] - 7:1, 187:21, 187:24 charitable [1] - 148:19 charity [3] - 79:1, 148:7, 148:16 chart [15] - 25:16, 25:25, 26:7, 26:16, 28:6, 28:14, 32:3, 32:18, 66:3, 66:7, 66:8, 66:14, 126:10, 241:20, 244:9 charter [1] - 4:13 CHARTER [1] - 1:1 Charter [483] -	1:20, 3:8, 3:16, 3:17, 3:22, 4:6, 4:15, 5:7, 6:10, 6:11, 6:12, 7:2, 7:23, 7:25, 8:1, 9:1, 9:22, 10:6, 12:8, 12:10, 12:20, 12:21, 12:25, 13:2, 13:4, 13:8, 13:12, 13:13, 13:18, 13:22, 14:1, 14:5, 14:11, 14:17, 14:25, 15:20, 16:14, 17:3, 17:14, 17:17, 17:18, 18:12, 18:17, 18:19, 19:12, 20:6, 23:3, 23:12, 23:24, 24:15, 25:19, 26:18, 27:14, 27:25, 28:9, 28:25, 29:4, 33:16, 33:21, 34:8, 34:22, 34:24, 35:10, 35:15, 36:20, 36:22, 37:4, 37:6, 37:11, 38:5,
--	--	---	---	---	--	---	--	---

38:8,	77:17,	115:16,	137:4,	174:5,	191:25,	230:12,	43:5,	180:10
38:16,	81:10,	115:24,	137:11,	174:6,	192:15,	230:14,	43:8,	Classroom
38:19,	81:14,	116:14,	137:17,	174:22,	193:1,	231:14,	102:21,	m [3] -
39:2,	81:15,	117:2,	137:18,	175:10,	193:5,	232:23,	130:16,	238:23,
40:13,	81:16,	118:9,	137:19,	175:22,	193:7,	233:9,	130:18,	239:17,
41:3,	81:19,	119:16,	137:25,	176:5,	193:11,	240:24,	131:1,	247:17
41:11,	81:22,	119:18,	138:21,	176:7,	194:18,	251:20,	157:3	classroom
42:25,	81:25,	119:22,	138:25,	176:15,	198:7,	252:6,	circumsta	[9] - 34:7,
43:19,	82:2,	120:11,	139:4,	176:20,	198:25,	252:7,	nces [3] -	220:20,
44:5,	82:16,	120:12,	139:7,	177:11,	199:5,	254:16,	23:20,	224:4,
45:1,	83:1,	120:14,	139:8,	177:12,	199:8,	257:1,	95:3,	247:22,
45:3,	85:12,	120:15,	139:21,	177:13,	200:6,	263:4,	206:22	248:3,
46:25,	85:14,	120:16,	139:25,	178:6,	200:25,	263:11,	Citadel [4] -	248:5,
47:3,	85:22,	120:19,	140:12,	178:10,	201:16,	263:12,	67:16,	248:8,
47:7,	86:22,	120:21,	141:15,	178:15,	203:3,	263:18,	229:7,	248:11,
47:24,	87:2,	121:20,	141:18,	178:24,	204:4,	265:9,	230:3	248:17
48:21,	87:12,	121:22,	143:20,	179:6,	204:16,	265:22,	citations	clause [1] -
49:11,	94:20,	122:3,	144:1,	180:11,	205:9,	266:14,	[2] -	105:14
49:17,	95:6,	122:5,	144:4,	180:18,	205:23,	267:3	253:20,	clean [1] -
49:20,	95:11,	122:14,	144:6,	180:21,	206:12,	charts [10] -	261:24	266:14
49:25,	96:2,	122:15,	144:11,	181:16,	206:14,	29:21,	citizens [2]	clear [18] -
50:3,	96:7,	122:20,	145:8,	181:18,	206:16,	32:23,	- 83:14,	14:4,
50:13,	96:13,	123:3,	145:15,	181:20,	206:17,	33:6,	104:13	16:20,
51:10,	96:20,	123:4,	151:15,	182:7,	206:19,	58:6,	citizenshi	74:19,
51:15,	97:25,	123:7,	151:18,	182:13,	207:3,	73:13,	p [1] -	75:19,
51:20,	99:21,	123:10,	151:20,	182:14,	207:4,	241:18,	21:16	103:10,
52:1,	100:3,	123:11,	151:25,	182:17,	207:11,	241:21,	City [2] -	138:8,
52:5,	100:6,	123:21,	152:6,	182:21,	208:6,	242:16,	86:19,	138:17,
52:12,	100:7,	123:23,	152:7,	183:1,	209:4,	244:9	136:25	138:20,
52:17,	100:8,	124:1,	152:14,	183:17,	210:14,	check [1] -	city [2] -	144:5,
52:19,	100:9,	125:9,	153:2,	183:19,	210:18,	46:9	149:12,	161:18,
53:8,	100:12,	125:19,	153:4,	184:1,	211:12,	checked [1]	150:23	171:11,
54:4,	100:13,	125:25,	153:13,	184:4,	212:2,	- 223:2	claim [1] -	171:20,
55:12,	100:17,	126:4,	154:3,	184:6,	212:4,	Chief [2] -	178:5	178:3,
55:17,	100:25,	126:5,	154:11,	184:19,	212:19,	78:15,	clarify [7] -	191:2,
56:3,	101:4,	126:19,	154:18,	185:18,	213:4,	220:3	13:15,	220:11,
56:4,	101:7,	127:4,	154:19,	185:25,	213:8,	child [7] -	50:17,	250:21,
56:20,	101:9,	127:13,	155:10,	186:1,	214:13,	50:20,	75:14,	266:14,
58:13,	101:15,	128:6,	156:12,	186:2,	214:19,	107:4,	117:6,	266:21
59:4,	102:10,	130:23,	157:11,	186:5,	215:16,	116:9,	137:21,	clearly [1] -
59:11,	102:22,	131:2,	157:13,	186:6,	215:19,	194:17,	228:19,	246:21
59:13,	102:24,	131:12,	158:2,	186:10,	216:9,	202:19,	239:23	clicked [1] -
59:17,	103:9,	131:15,	158:15,	186:11,	216:19,	202:24,	clarifying	43:11
60:12,	103:15,	131:20,	159:3,	186:15,	217:3,	205:22	[2] - 70:11,	close [2] -
60:16,	103:19,	131:23,	159:13,	186:16,	217:21,	Child [1] -	75:24	22:22,
61:1,	103:24,	131:25,	160:4,	186:18,	217:25,	268:14	clarity [3] -	183:9
61:22,	107:11,	132:1,	160:22,	186:20,	218:1,	children [1]	14:15,	closer [3] -
62:7,	107:14,	132:3,	160:24,	187:5,	218:4,	- 184:20	158:14,	3:11,
62:22,	108:7,	132:17,	161:1,	187:7,	218:9,	chose [1] -	207:1	12:1,
67:7,	108:13,	132:24,	161:21,	187:9,	218:22,	128:8	class [5] -	240:19
67:17,	108:19,	133:6,	162:7,	187:17,	219:17,	Chris [1] -	73:20,	closes [1] -
67:21,	108:20,	133:10,	162:18,	187:25,	220:2,	129:16	197:8,	241:5
67:25,	108:21,	133:14,	163:14,	188:4,	220:11,	chronolog	212:5,	cloud [1] -
68:12,	108:23,	133:15,	164:8,	188:23,	220:13,	ical [1] -	236:12,	27:3
69:1,	109:10,	134:6,	166:5,	188:24,	220:15,	268:6	236:13	cloud-
69:5,	110:12,	134:12,	166:8,	188:25,	220:17,	chronolog	classes [6]	based [1]
69:11,	110:19,	135:1,	167:3,	189:6,	221:7,	y [1] -	- 21:7,	- 27:3
70:18,	111:6,	135:4,	172:10,	189:12,	222:12,	242:22	229:19,	Clyde [11] -
72:23,	111:15,	135:10,	172:13,	189:20,	222:16,	Cianci [2] -	244:2,	2:4, 15:1,
73:16,	111:16,	135:15,	172:18,	189:22,	222:24,	1:13,	244:3,	15:7,
74:23,	112:3,	135:21,	173:10,	191:13,	224:6,	12:14	244:7,	15:17,
76:8,	113:11,	135:24,	173:11,	191:17,	224:12,	CIANCI [9] -	265:5	15:18,
76:24,	113:22,	136:1,	173:16,	191:19,	225:24,	11:1,	classificati	19:14,
77:10,	115:12,	136:15,	174:2,	191:23,	230:9,	12:14,	ons [1] -	31:25,

33:4, 34:19, 71:5, 75:15 CLYDE [1] - 15:2 Clyde's [1] - 141:11 CNA [9] - 148:3, 148:6, 148:19, 149:1, 149:4, 149:10, 149:11, 149:22, 150:13 co [1] - 197:23 co-occur [1] - 197:23 coalition [4] - 82:1, 85:17, 85:25, 166:20 Coalition [1] - 117:11 Coatesvill e [1] - 9:3 code [2] - 202:8 Code [2] - 125:23, 133:13 coded [1] - 66:13 coherent [1] - 173:5 cohort [4] - 80:1, 228:4, 245:4, 245:17 cohorts [3] - 79:23, 82:24, 265:5 coin [1] - 228:9 collaborat e [1] - 179:20 collaborati ng [2] - 138:18, 235:22 collaborati on [2] - 237:8, 240:3 collaborati ve [2] - 101:21, 180:3 collaborati vely [1] - 86:18 collar [1] - 261:16 colleague [1] - 228:12 colleague s [1] - 255:12 collect [2] - 169:18, 169:19 collected [3] - 18:23, 20:6, 170:16 College [10] - 79:21, 79:22, 86:10, 86:18, 135:16, 135:20, 164:3, 165:24, 221:2, 222:2 college [13] - 34:12, 40:8, 40:13, 40:14, 79:14, 80:2, 82:24, 85:2, 85:4, 86:9, 91:18, 92:1, 104:22 colon [1] - 170:3 color [3] - 32:11, 66:12, 243:14 colored [1] - 32:25 Columbia [1] - 261:15 columns [3] - 22:13, 22:16, 126:14 combinati	on [1] - 54:6 coming [14] - 124:22, 170:21, 200:25, 205:15, 211:5, 224:19, 226:25, 227:20, 229:14, 233:23, 234:11, 240:16, 249:3, 265:4 commenc ed [1] - 150:6 comment [5] - 6:19, 14:8, 81:13, 129:1, 267:25 comments [1] - 5:18 commerci ally [1] - 248:25 commitme nt [2] - 144:9, 265:10 commitme nts [2] - 134:5, 134:11 Common [1] - 253:3 common [3] - 5:10, 137:11, 161:16 Commonw ealth [5] - 9:2, 33:11, 111:14, 114:6, 271:13 communic ated [6] - 122:3, 130:9, 155:21, 157:17, 161:14, 212:2 communic ating [1] - 161:10	communic ation [3] - 83:8, 156:4, 188:4 communic ations [4] - 17:22, 37:15, 40:9, 192:9 communiti es [1] - 79:9 communit y [25] - 24:22, 79:10, 79:24, 81:12, 81:24, 82:9, 82:13, 82:23, 82:25, 83:5, 83:10, 83:17, 83:22, 84:3, 85:19, 85:25, 86:3, 89:5, 90:15, 104:14, 112:8, 112:25, 113:1, 148:10, 246:15 Communit y [1] - 81:11 communit y-based [1] - 79:24 Company [2] - 6:6, 148:3 comparabl e [1] - 225:2 compare [4] - 67:24, 137:1, 227:9, 243:12 compared [4] - 32:17, 60:22, 232:3, 244:19 comparing	[3] - 255:3, 264:20, 265:4 compariso n [5] - 170:22, 195:8, 245:15, 245:16, 269:2 compensa ted [3] - 37:8, 38:19, 153:21 compensa tion [4] - 38:21, 154:4, 218:1, 218:3 compete [1] - 88:24 competen cy [2] - 97:22, 105:8 competitiv e [1] - 81:8 complete [6] - 91:17, 136:3, 148:19, 167:12, 167:22, 175:22 completed [8] - 24:4, 132:4, 149:5, 167:3, 167:9, 171:8, 171:18, 243:22 completel y [10] - 96:17, 118:10, 134:18, 138:3, 138:7, 190:20, 213:13, 223:20, 245:16, 264:1 completio n [2] - 7:16, 72:3 complex [1] - 148:18 complianc	e [4] - 4:15, 6:20, 146:10, 146:24 compliant [1] - 146:16 complied [1] - 145:24 complies [42] - 19:10, 22:23, 27:10, 48:16, 49:6, 51:12, 66:22, 89:17, 94:9, 94:11, 95:16, 99:24, 105:6, 107:9, 119:10, 120:1, 121:16, 123:15, 125:13, 130:14, 131:16, 136:7, 139:10, 143:6, 156:18, 157:2, 158:21, 160:2, 166:14, 215:2, 215:4, 218:17, 231:18, 233:10, 237:25, 241:15, 247:19, 252:4, 257:16, 260:24, 263:2, 263:6 comply [8] - 11:7, 108:13, 110:19, 141:5, 155:16, 156:10, 157:11, 161:9	complying [1] - 11:4 componen ts [1] - 98:10 compositi on [3] - 13:3, 96:18, 158:6 comprehe nsion [1] - 98:10 comprehe nsional [1] - 74:6 comprehe nsive [2] - 134:15, 255:14 computer [3] - 233:4, 251:1, 251:2 concentrat ed [1] - 195:15 concentrat ion [3] - 195:19, 197:21, 198:1 concept [2] - 83:1, 193:10 concern [8] - 10:1, 107:20, 137:10, 138:9, 144:8, 182:23, 182:24, 268:13 concerned [13] - 88:22, 93:5, 107:25, 109:4, 111:1, 112:10, 138:15, 167:6, 172:21, 172:22, 173:3, 173:7, 177:24 concerns [24] - 88:8, 88:9, 88:15,	88:17, 89:1, 89:9, 90:7, 92:21, 93:1, 93:3, 95:2, 96:3, 137:20, 179:12, 183:2, 183:7, 183:13, 183:20, 184:8, 184:14, 184:20, 184:22, 185:4, 185:17 conclusio n [5] - 9:8, 14:4, 32:8, 62:12, 68:23 conclusio ns [1] - 7:15 conditions [4] - 100:16, 122:15, 174:8, 189:21 conduct [4] - 5:18, 5:20, 142:24, 235:2 conducted [4] - 54:12, 83:22, 138:10, 203:6 conduit [1] - 235:20 confer [1] - 136:20 conferenc e [4] - 8:12, 9:14, 10:25, 256:8 conferenc es [2] - 7:10, 236:25 conferred [1] - 45:17 confess [2] - 87:4,	167:21 confidenc e [2] - 50:22, 236:19 confident [4] - 25:6, 109:6, 142:17, 162:10 confirm [2] - 250:17, 250:20 confirmed [2] - 11:7, 223:6 confirmin g [1] - 8:5 conflate [1] - 198:13 conflict [5] - 13:11, 115:14, 115:19, 184:8, 188:15 conform [2] - 110:23, 152:14 confused [2] - 63:20, 129:8 confusing [1] - 171:21 confusion [2] - 135:3, 135:6 congruent [1] - 213:13 connectio n [3] - 156:11, 214:22, 214:23 consecuti ve [1] - 264:21 consensu s [1] - 135:9 consequ ently [10] - 225:4, 225:16, 227:17, 232:9, 243:3, 248:10, 255:19, 259:7, 264:14,
---	--	---	---	--	---	---	--

268:7 consider [1] - 118:4 Considera tion [1] - 143:13 considerat ion [1] - 143:15 considerere d [6] - 28:13, 41:2, 84:17, 117:24, 128:25, 228:10 considerin g [2] - 128:22, 143:18 consist [1] - 136:16 consisted [1] - 96:21 consistent [21] - 3:19, 4:16, 7:13, 101:14, 109:12, 120:13, 120:19, 124:3, 132:20, 134:5, 134:10, 134:17, 175:16, 175:18, 176:22, 177:4, 183:24, 184:4, 215:18, 240:9, 249:19 constant [1] - 88:19 constraint s [1] - 39:17 consultan cy [3] - 79:11, 80:7, 80:20 consultant [10] - 35:24, 220:9, 223:10, 223:11, 223:14,	232:7, 233:17, 234:11, 246:6, 263:17 consultati on [1] - 228:15 consultati ons [1] - 153:10 consulting [4] - 83:25, 221:1, 221:2, 221:4 consumin g [1] - 128:11 consumpti on [2] - 24:12, 68:8 contact [2] - 82:22, 86:2 contacts [2] - 82:25, 113:13 contain [4] - 100:7, 110:9, 127:1, 174:15 contained [6] - 33:5, 101:9, 113:16, 133:22, 189:7, 271:4 containing [1] - 124:1 content [9] - 24:23, 97:23, 103:21, 105:8, 253:8, 258:7, 259:13, 259:14 contents [1] - 141:3 Contents [2] - 159:16, 159:19 context [1] - 141:7 continue [11] - 4:2,	36:11, 38:5, 93:14, 118:6, 122:10, 122:19, 124:23, 128:18, 155:2, 212:17 continued [4] - 39:5, 94:1, 153:18, 155:3 continues [1] - 202:5 continuing [3] - 39:21, 117:25, 221:1 continuou sly [2] - 79:2, 153:19 Contract [1] - 135:12 contract [1] - 135:22 contracts [2] - 135:16, 136:2 contradict [1] - 246:25 contrary [1] - 201:21 contribute d [1] - 35:25 control [4] - 102:5, 102:7, 259:5, 259:6 controvers y [1] - 184:3 convened [2] - 16:17, 191:18 convening [1] - 4:21 conversati on [5] - 175:17, 190:4, 200:14, 202:23, 224:21 conversati	ons [13] - 5:15, 43:20, 92:11, 92:12, 117:25, 130:2, 130:7, 132:23, 148:18, 152:4, 185:7, 188:9, 208:1 conveyed [5] - 52:16, 54:5, 70:21, 217:7, 240:12 convinced [1] - 91:13 Cooper [1] - 150:16 cooperativ e [1] - 4:23 cooperativ ely [1] - 11:20 Coordinat or [2] - 220:22, 234:24 copied [3] - 114:6, 139:16, 157:24 copies [3] - 25:1, 32:23, 32:25 copy [8] - 6:24, 7:19, 8:3, 118:24, 121:5, 123:22, 139:13, 271:6 Core [8] - 100:10, 209:2, 221:25, 241:10, 252:19, 253:2, 253:3, 253:23 core [2] - 209:6, 249:21 corporate [2] - 78:22, 79:7	Corporatio n [2] - 149:1, 248:14 corporatio n [3] - 77:22, 78:1, 79:1 Correct [1] - 147:15 correct [223] - 8:16, 8:17, 8:22, 8:23, 10:2, 10:12, 10:25, 15:21, 15:22, 20:16, 20:18, 22:8, 23:3, 26:11, 27:19, 28:14, 28:16, 29:7, 31:12, 35:1, 35:15, 36:21, 37:12, 44:25, 45:16, 46:3, 46:6, 47:20, 47:24, 48:9, 48:13, 49:1, 49:2, 49:4, 49:14, 49:18, 49:19, 49:23, 50:9, 50:10, 51:8, 51:15, 51:16, 53:6, 55:5, 57:4, 57:19, 58:4, 58:10, 59:2, 59:3, 59:5,	59:6, 60:20, 61:20, 62:9, 63:7, 63:8, 63:10, 64:15, 65:4, 65:21, 65:25, 66:25, 67:21, 67:22, 68:14, 69:9, 69:15, 69:16, 69:25, 70:8, 70:23, 71:1, 76:5, 76:6, 76:10, 77:15, 82:11, 87:16, 98:16, 98:24, 99:1, 99:2, 108:5, 108:23, 108:24, 110:10, 110:11, 118:22, 118:25, 119:3, 119:21, 122:1, 125:10, 125:11, 126:17, 137:5, 137:7, 137:8, 138:2, 138:5, 139:22, 140:2, 140:14, 141:17, 141:19, 142:11, 145:10, 145:16, 145:19, 147:5, 147:18, 149:15, 153:17, 153:20,	153:22, 153:23, 154:11, 154:16, 154:19, 155:9, 157:1, 157:21, 157:24, 157:25, 158:13, 159:5, 159:8, 159:9, 159:10, 160:16, 160:17, 160:19, 160:25, 161:6, 162:17, 162:20, 163:1, 163:7, 164:9, 164:12, 165:17, 165:20, 166:10, 170:8, 172:15, 174:2, 174:3, 174:14, 174:18, 174:20, 174:23, 174:24, 175:25, 177:5, 177:6, 177:9, 177:19, 177:20, 178:7, 178:12, 179:2, 179:4, 179:5, 181:24, 182:2, 182:4, 182:5, 183:15, 183:16, 185:14, 185:19, 186:12, 186:21, 187:6, 187:9, 187:10, 187:11, 187:14,	187:15, 187:22, 187:23, 188:2, 188:21, 189:1, 189:3, 189:9, 189:12, 189:13, 189:23, 190:5, 190:10, 190:12, 190:15, 191:8, 195:19, 195:23, 196:15, 203:2, 211:18, 211:22, 211:25, 213:5, 213:15, 213:16, 215:20, 216:19, 216:20, 216:23, 217:4, 217:22, 230:5, 230:13, 243:16, 243:17, 262:3, 271:7 correctly [3] - 67:11, 69:13, 152:8 correlate [4] - 54:17, 64:17, 64:24, 64:25 correlates [1] - 52:12 correspon d [2] - 63:23, 65:25 correspon ded [1] - 67:12 correspon ding [1] - 62:4 correspon ds [3] - 66:8, 244:10, 244:12	cost [2] - 88:18, 88:20 costing [1] - 154:9 costs [1] - 135:25 Council [2] - 136:21, 136:22 Counsel [49] - 3:20, 4:23, 5:3, 5:12, 5:16, 6:1, 6:23, 7:19, 8:8, 10:11, 12:6, 31:9, 70:18, 76:18, 77:12, 78:8, 109:5, 120:4, 123:21, 124:22, 125:7, 130:22, 137:9, 145:1, 146:6, 146:15, 146:24, 147:3, 152:9, 153:4, 153:11, 153:12, 154:2, 154:12, 155:20, 155:21, 155:22, 161:8, 173:13, 173:14, 173:18, 173:21, 175:21, 180:6, 181:10, 181:11, 183:9, 192:8 counselin g [1] - 45:8 Counselor [4] - 20:8, 20:12, 45:9, 46:11 Counselor
---	--	---	---	---	--	--	---	--

s [1] - 108:1 counter [1] - 267:2 country [1] - 248:21 County [2] - 222:14, 236:5 couple [4] - 6:3, 133:7, 229:21, 236:7 course [23] - 50:20, 69:8, 91:19, 102:13, 104:1, 133:3, 144:15, 188:14, 193:25, 224:2, 242:5, 242:13, 242:15, 243:23, 245:5, 246:1, 246:22, 247:15, 258:7, 258:13, 259:21, 260:2, 260:9 courses [25] - 21:14, 50:17, 223:17, 245:24, 245:25, 246:4, 246:8, 246:17, 246:18, 249:19, 249:20, 249:22, 256:17, 257:22, 257:25, 258:1, 258:3, 258:12, 259:23, 260:10, 260:12, 260:15, 260:21, 262:20	COURT [2] - 1:23, 271:15 Court [8] - 4:17, 5:11, 5:17, 9:2, 12:1, 31:7 courtesies [1] - 5:11 cover [8] - 90:2, 90:23, 91:3, 92:3, 96:23, 113:19, 116:13, 118:10 covered [2] - 150:21, 211:4 crank [1] - 264:9 create [10] - 24:16, 56:2, 57:25, 84:11, 111:2, 141:15, 141:25, 173:20, 246:17, 269:1 created [13] - 24:3, 57:6, 59:8, 68:5, 173:9, 180:4, 183:6, 206:19, 213:12, 240:2, 248:22, 249:11, 255:24 creating [10] - 23:15, 23:20, 35:20, 74:11, 103:12, 104:2, 179:17, 207:6, 252:9, 259:2 creation [1] - 81:19 credit [8] -	21:21, 21:22, 21:24, 167:17, 168:5, 171:15, 171:19, 255:8 credits [8] - 84:23, 96:12, 96:15, 167:14, 168:12, 168:15, 168:23, 194:5 criteria [4] - 112:2, 114:13, 120:21, 120:23 critical [1] - 227:15 critically [1] - 107:2 criticizing [1] - 266:16 cross [10] - 3:24, 4:11, 9:24, 10:13, 34:15, 71:9, 75:14, 152:18, 212:17, 217:20 cross- examination [5] - 3:24, 10:13, 34:15, 75:14, 217:20 cross- examine [2] - 4:11, 152:18 cross- examined [1] - 9:24 culminatin g [1] - 220:21 culture [3] - 91:23, 104:3, 107:2 cumulativ e [4] - 32:4,	32:6, 32:11, 42:13 current [10] - 19:19, 19:20, 28:3, 28:4, 119:17, 162:22, 253:16, 261:4, 261:9, 269:1 Current [1] - 159:22 curricular [2] - 101:18, 225:19 curricularl y [1] - 224:14 curriculu m [19] - 33:23, 34:5, 44:18, 95:22, 96:9, 110:9, 110:15, 110:20, 110:23, 125:22, 133:11, 167:20, 236:24, 237:17, 240:22, 240:25, 241:1, 245:10 Curriculu m [4] - 30:10, 222:14, 240:1, 240:21 curriculu ms [1] - 237:18 curve [1] - 66:16 cut [3] - 59:8, 60:21, 243:24 cut-off [1] - 59:8 cutoffs [1] - 228:14 CYNDA [2] - 15:2,	15:17 Cynda [5] - 2:4, 15:1, 15:17, 141:11, 142:3 D d [1] - 180:15 D.A.'s [2] - 78:16 D.T [1] - 48:17 dad [2] - 201:23, 205:20 daily [5] - 214:5, 214:8, 215:23, 216:3, 216:11 damaging [3] - 128:11, 128:12 data [121] - 19:3, 19:5, 20:23, 22:6, 25:25, 26:2, 26:8, 26:24, 27:1, 27:17, 30:1, 33:4, 34:6, 41:9, 41:21, 41:23, 42:11, 42:19, 43:18, 43:21, 44:20, 45:3, 45:11, 45:15, 45:23, 46:4, 51:2, 52:11, 52:12, 52:17, 52:20, 53:8, 53:11, 53:12, 53:22,	53:25, 54:1, 55:1, 55:22, 55:24, 56:20, 57:23, 57:24, 58:5, 58:7, 59:12, 61:18, 62:5, 62:6, 62:7, 62:15, 62:25, 63:5, 63:11, 63:20, 63:24, 65:15, 70:19, 71:20, 74:21, 74:22, 75:4, 75:6, 84:18, 100:11, 141:7, 141:8, 169:10, 169:13, 169:18, 169:19, 169:23, 170:16, 170:23, 196:5, 199:4, 199:18, 201:13, 204:2, 204:3, 209:3, 209:17, 217:11, 223:6, 223:21, 223:22, 224:10, 225:4, 226:4, 227:13, 227:14, 227:16, 227:20, 227:21, 227:25, 228:18, 228:19, 229:17, 232:6,	234:3, 234:6, 240:12, 242:19, 243:4, 247:11, 248:5, 249:24, 250:1, 250:3, 250:8, 252:20, 256:2, 257:10, 260:7, 260:14, 262:18, 262:21, 263:18 Data [14] - 18:14, 18:21, 20:2, 23:23, 36:23, 38:8, 39:3, 41:6, 42:10, 45:16, 57:21, 62:22, 73:6, 248:13 database [1] - 226:16 DATE [1] - 1:5 date [27] - 14:21, 24:1, 38:16, 39:8, 48:11, 49:10, 57:5, 59:9, 74:22, 87:11, 92:2, 92:19, 111:15, 111:16, 111:17, 111:19, 111:20, 120:25, 146:19, 149:6, 150:13, 156:8, 182:13, 182:16,	182:18, 183:9, 267:14 dated [6] - 2:16, 24:2, 119:12, 120:5, 123:20, 159:9 dates [10] - 6:13, 65:20, 65:25, 66:1, 66:7, 66:11, 72:15, 72:16, 82:8, 163:3 DAVID [2] - 77:1, 77:8 David [6] - 2:7, 24:17, 76:24, 77:8, 77:9, 160:13 day-to-day [1] - 136:17 days [5] - 7:16, 72:2, 72:23, 135:14, 150:15 deal [6] - 3:14, 4:4, 85:3, 221:23, 222:2, 258:3 dealing [2] - 134:17, 167:10 deals [1] - 182:13 dealt [3] - 222:9, 258:17, 258:21 Dean [1] - 70:14 debate [2] - 167:15, 171:10 debated [1] - 209:7 decade [1] - 82:18 December	[8] - 6:24, 7:19, 8:3, 65:22, 178:14, 220:9, 240:17, 242:1 decent [1] - 197:23 decided [3] - 89:6, 94:20, 96:6 decision [7] - 6:19, 82:15, 87:20, 89:6, 130:10, 155:21, 236:7 declinatio n [1] - 87:23 decline [1] - 87:20 declined [5] - 88:12, 100:2, 100:3, 190:6, 206:11 dedicated [1] - 234:14 dedication [2] - 150:20, 151:9 deeded [1] - 149:6 deep [2] - 5:23, 113:4 deeper [1] - 251:10 defending [1] - 9:20 defense [3] - 4:12, 10:4, 11:13 deficits [3] - 106:11, 106:20, 264:15 define [6] - 110:4, 193:11, 193:12, 193:13, 197:14, 198:10 defined [4]
--	--	--	--	--	--	---	--	--

- 132:1, 132:2, 196:19, 200:8 definitely [1] - 249:17 definition [4] - 116:3, 131:25, 199:16, 223:9 definitions [1] - 200:19 degree [2] - 40:19, 165:20 delayed [1] - 6:15 delegated [1] - 136:18 deliberate d [1] - 92:20 deliberatio n [1] - 88:5 deliberatio ns [6] - 92:25, 93:2, 94:3, 95:2, 127:18, 237:3 delineate [2] - 135:17, 135:22 deliver [1] - 79:14 delivered [2] - 25:7, 82:5 delivering [2] - 41:20, 74:14 delivery [1] - 25:3 demands [1] - 128:19 demonstra te [1] - 6:2 demonstra ted [1] - 32:9 denied [1] - 166:9 Denise [1] - 160:13 deny [1] -	89:2 Departme nt [16] - 51:19, 108:14, 139:1, 217:15, 223:11, 223:12, 234:21, 235:16, 235:20, 236:1, 236:22, 237:3, 237:16, 238:15, 238:17, 248:20 departmen ts [1] - 235:16 departure [1] - 75:10 depicted [5] - 28:6, 32:3, 48:4, 66:2, 66:13 depicting [1] - 32:20 derivation [1] - 53:25 derived [2] - 26:2, 30:6 describe [10] - 25:14, 27:23, 71:23, 84:6, 89:25, 91:2, 149:7, 224:11, 250:21, 250:23 described [11] - 24:5, 44:19, 66:2, 141:2, 181:16, 182:15, 195:1, 197:1, 197:5, 240:22, 244:17 describes [2] - 90:6, 90:7	describing [3] - 23:13, 80:23, 90:3 DESCRIPT ION [1] - 2:12 descriptio n [2] - 30:14, 96:8 descriptor s [1] - 255:10 design [7] - 33:23, 34:6, 73:23, 73:25, 89:9, 95:7, 134:12 designate [1] - 9:4 designate d [1] - 41:5 designed [4] - 30:11, 44:4, 242:2, 242:13 designing [1] - 34:4 desire [2] - 91:5, 103:25 despite [1] - 128:4 destroy [1] - 243:2 detail [6] - 9:7, 20:4, 83:19, 184:5, 225:22, 261:6 detailed [2] - 42:6, 173:12 details [4] - 25:15, 200:2, 203:5, 236:15 determine [4] - 148:11, 200:12, 202:23, 204:10 determine d [4] - 64:3,	168:3, 168:4, 224:17 develop [5] - 82:1, 83:6, 97:22, 105:7, 214:20 developed [5] - 17:20, 83:1, 149:21, 174:22, 250:9 Developm ent [5] - 16:3, 36:8, 39:25, 40:21, 78:25 developm ent [26] - 16:9, 17:13, 36:24, 36:25, 40:7, 79:10, 79:11, 79:13, 80:6, 80:9, 80:12, 81:12, 81:22, 82:19, 82:20, 83:3, 83:4, 83:7, 83:12, 84:4, 86:20, 91:22, 104:2, 104:3, 237:15 devised [1] - 106:5 Diagnostic [3] - 238:23, 239:17, 247:17 diagnostic [5] - 247:22, 248:5, 248:12, 248:17, 251:16 diagnostic	s [2] - 248:4, 248:8 diagonal [1] - 63:21 dialog [2] - 87:9, 173:17 dialogs [1] - 148:18 dialogue [8] - 101:21, 115:3, 115:4, 129:2, 132:21, 148:11, 171:22, 173:8 differed [1] - 120:23 difference [4] - 59:19, 133:1, 197:25, 230:17 difference s [2] - 62:5, 262:19 different [34] - 24:9, 31:15, 60:8, 61:7, 61:21, 65:20, 66:1, 66:3, 66:6, 67:23, 70:8, 102:18, 115:21, 130:19, 132:24, 134:18, 138:3, 138:7, 144:6, 169:2, 180:9, 195:4, 199:24, 206:20, 207:18, 208:25, 226:5, 228:14, 232:12, 247:14, 248:9, 249:19,	265:3, 268:11 differentia te [3] - 259:12, 259:14, 259:15 difficult [2] - 32:10, 108:2 difficulties [1] - 267:13 dig [1] - 53:21 Dilks [2] - 1:23, 271:12 direct [13] - 3:25, 9:24, 10:15, 24:15, 26:23, 31:11, 51:14, 71:9, 87:9, 124:24, 141:25, 211:4, 257:15 direct- examination [3] - 31:11, 51:14, 124:24 directing [1] - 31:17 direction [1] - 237:15 directions [1] - 266:15 directly [7] - 18:11, 22:20, 27:7, 66:3, 87:8, 165:13 Director [10] - 16:3, 16:5, 36:7, 39:25, 40:10, 78:21, 79:5, 148:4, 222:14, 235:4 Director/	President /CEO [1] - 153:16 Directors [9] - 3:6, 119:14, 136:17, 137:3, 137:4, 175:7, 175:13, 186:2, 189:15 disadvant aged [5] - 86:8, 90:14, 197:15, 198:8, 257:6 disappoint ed [1] - 245:3 disaster [1] - 264:18 discharge [1] - 7:12 discipline [2] - 236:16, 236:21 disclosed [3] - 150:14, 156:5, 165:19 disconnec ted [4] - 91:8, 102:12, 106:9, 203:14 discount [1] - 68:6 discounte d [1] - 67:22 discountin g [1] - 68:2 discreet [1] - 265:3 discrepan cy [2] - 100:14, 236:9 discrete [4] - 12:24, 13:5, 100:12, 264:7 discuss [2] - 115:6, 129:19	discussed [7] - 9:16, 11:7, 33:4, 129:3, 129:14, 129:15, 148:8 discussin g [3] - 9:18, 129:10, 184:18 discussio n [2] - 3:12, 167:5 Discussio n [6] - 124:17, 131:5, 143:8, 212:14, 219:15, 269:25 discussio ns [6] - 3:19, 123:4, 129:11, 130:5, 185:8 dismissed [1] - 8:21 dispose [1] - 7:11 disrespect [1] - 165:8 disrupt [1] - 5:13 disruptive [1] - 5:18 dissimilar [1] - 268:12 distinguis h [1] - 216:5 distraction [1] - 128:14 distributio n [1] - 25:2 district [4] - 221:10, 224:19, 225:10, 261:17 District [129] - 1:7, 1:15, 3:6, 3:8, 3:18, 4:1, 4:4,	5:6, 6:9, 9:13, 10:3, 10:14, 10:16, 12:11, 12:13, 12:15, 13:18, 14:2, 16:15, 17:15, 24:14, 24:24, 55:1, 71:16, 71:20, 78:15, 84:18, 84:20, 87:2, 101:13, 101:23, 103:10, 108:8, 110:12, 110:21, 111:2, 111:18, 113:23, 114:2, 114:6, 114:8, 114:17, 115:5, 118:2, 118:21, 118:24, 119:14, 119:19, 122:2, 122:12, 122:16, 122:18, 125:9, 125:25, 126:19, 128:16, 128:18, 129:7, 129:19, 133:18, 135:9, 136:3, 138:16, 139:1, 140:4, 140:7, 140:10, 140:15, 142:11, 142:16, 144:1, 144:24,
---	--	--	---	--	--	--	--	---

145:2, 147:3, 147:14, 150:9, 155:11, 159:7, 161:11, 161:15, 167:6, 170:4, 172:18, 173:20, 175:4, 175:7, 176:6, 178:18, 179:7, 179:20, 182:10, 183:10, 183:18, 183:23, 184:9, 185:12, 186:3, 187:20, 188:3, 188:6, 188:8, 188:10, 188:18, 189:15, 190:19, 190:23, 191:7, 192:10, 195:25, 196:14, 203:18, 206:11, 207:2, 211:16, 211:19, 212:2, 217:14, 218:21, 220:23, 221:13, 230:2, 230:11, 233:5, 254:22, 261:11, 261:16, 266:1, 266:7 District's [10] - 6:17, 10:1, 117:9, 117:12, 120:11, 132:12, 144:8,	146:15, 152:8, 166:21 districts [5] - 221:2, 222:10, 227:17, 236:5, 242:9 diverse [2] - 257:4, 261:16 divided [4] - 45:7, 46:19, 46:23, 168:9 divine [1] - 13:21 Doctor [1] - 44:13 document [78] - 23:7, 23:16, 23:18, 23:20, 23:23, 24:2, 24:5, 24:6, 24:12, 24:16, 24:19, 24:24, 25:9, 29:25, 35:18, 49:10, 51:18, 52:22, 52:23, 53:4, 53:16, 53:23, 56:2, 59:22, 59:25, 70:9, 94:15, 103:4, 103:6, 103:12, 103:17, 103:18, 109:7, 120:3, 131:7, 131:10, 132:9, 139:11, 139:18, 157:7, 157:9, 160:4,	172:13, 172:23, 174:9, 174:13, 174:19, 175:14, 178:6, 178:8, 178:11, 178:16, 179:9, 181:22, 186:11, 206:10, 207:2, 207:19, 207:22, 208:14, 208:20, 210:10, 212:23, 213:18, 213:19, 217:7, 217:14, 219:1, 231:20, 231:23, 232:2, 232:15, 233:2, 233:4, 233:24, 234:13, 252:9, 261:6 document s [6] - 19:16, 19:22, 30:1, 159:12, 175:20, 192:14 dollars [1] - 80:17 donating [2] - 148:6, 148:20 donative [2] - 149:2, 149:3 done [24] - 28:1, 30:16, 71:24, 72:20, 78:19, 79:12, 82:17, 82:18, 82:20, 83:16, 91:12,	111:13, 144:12, 147:9, 147:11, 148:9, 155:23, 195:24, 203:12, 235:14, 246:24, 250:16, 260:3, 267:16 double [1] - 46:9 double- check [1] - 46:9 down [14] - 35:9, 67:13, 117:4, 154:21, 159:21, 213:25, 224:3, 239:2, 239:9, 244:6, 248:16, 251:2, 257:15, 264:19 download [1] - 42:12 download ed [6] - 26:2, 27:1, 41:24, 58:5, 58:6, 75:5 downtown [1] - 149:13 Dr [21] - 2:9, 42:23, 44:16, 44:22, 70:14, 70:17, 129:16, 129:18, 139:13, 140:3, 162:9, 162:23, 165:6, 165:9, 165:11, 165:12, 185:10, 185:17, 192:18,	219:17, 220:1 dr [1] - 44:15 draft [5] - 188:23, 188:24, 189:22, 240:2, 240:10 drafting [4] - 30:21, 177:25, 207:19, 208:3 drain [1] - 88:22 draw [1] - 88:22 drawing [2] - 138:16, 145:25 drawn [2] - 103:13, 217:12 Drew [2] - 185:10, 185:11 Drive [1] - 1:24 drop [1] - 112:18 dropout [20] - 91:11, 91:14, 93:19, 109:12, 109:18, 110:3, 112:14, 131:25, 132:2, 168:15, 168:18, 171:8, 176:22, 177:7, 193:10, 193:11, 193:12, 194:1, 194:2, 202:13 dropouts [15] - 104:12, 112:9, 112:20, 115:25, 117:17, 118:15, 119:20, 168:22,	171:25, 172:1, 174:17, 200:8, 204:17, 205:10 dropped [13] - 84:12, 112:23, 117:9, 117:11, 120:18, 133:1, 133:4, 166:21, 190:19, 190:24, 191:6, 196:18, 199:16 dropping [6] - 84:24, 112:12, 112:18, 113:10, 194:4, 196:25 dubious [1] - 257:7 due [1] - 6:16 duly [3] - 15:3, 77:2, 219:19 duress [3] - 128:9, 128:19, 157:13 during [40] - 7:10, 10:9, 16:17, 19:1, 23:12, 23:23, 31:10, 32:12, 54:12, 54:13, 72:2, 73:17, 85:13, 86:11, 87:8, 93:2, 100:4, 113:8, 114:22, 115:11, 115:19, 115:24, 116:7,	119:4, 122:21, 126:1, 131:20, 131:22, 133:17, 138:24, 149:4, 151:18, 178:14, 205:19, 211:4, 215:24, 230:22, 235:12, 263:15 duties [1] - 7:13 dynamics [1] - 251:8 E e-mail [7] - 139:13, 139:16, 140:1, 140:3, 142:19, 192:17, 268:20 Eagle [3] - 6:6, 6:8, 150:22 early [8] - 81:23, 93:21, 117:12, 166:22, 226:22, 228:18, 229:8, 266:12 earned [5] - 21:22, 80:20, 81:17, 84:23, 132:4 easiest [1] - 260:1 Eastern [1] - 40:20 echoed [1] - 94:2 Economic [1] - 40:21 economic ally [4] - 197:14, 198:5, 198:8, 257:6 economy	[2] - 83:15, 104:14 Ed [2] - 254:25, 257:11 edited [4] - 16:18, 16:19, 35:22, 35:25 editing [1] - 35:18 educated [3] - 133:1, 133:2, 196:18 educating [3] - 100:13, 106:25, 183:14 education [13] - 34:10, 79:10, 79:14, 80:3, 80:18, 86:9, 91:22, 95:19, 109:10, 110:5, 110:20, 176:20 Education [18] - 24:13, 51:19, 78:25, 79:21, 86:10, 98:13, 105:17, 108:14, 125:24, 133:14, 139:2, 164:18, 209:23, 210:13, 217:15, 218:21, 218:22, 261:15 education al [6] - 40:6, 40:18, 104:15, 165:22, 254:22, 264:4 educators	[3] - 230:3, 234:14, 242:25 effect [4] - 109:14, 109:16, 155:17, 247:4 effective [1] - 107:6 effectively [1] - 167:7 Effectiven ess [1] - 235:4 effectiven ess [1] - 83:9 effects [2] - 13:10, 13:11 efficient [1] - 126:18 efficiently [1] - 235:22 effort [13] - 5:1, 35:23, 35:24, 60:2, 72:1, 73:1, 142:8, 142:24, 142:25, 203:7, 203:8, 212:23, 248:2 efforts [3] - 4:22, 71:23, 151:17 eight [2] - 15:25, 36:9 Eisenhow er [1] - 81:3 either [19] - 5:12, 11:13, 29:9, 57:11, 75:12, 76:11, 142:14, 169:16, 176:13, 183:14, 186:1, 186:12, 189:8,
--	--	--	---	---	--	---	---	--

228:9, 236:10, 248:7, 248:24, 255:18, 256:3 ELA [2] - 246:20, 247:2 elaborate [2] - 11:2, 101:11 elected [1] - 186:10 electronic [2] - 58:8, 109:4 elementar y [2] - 25:22, 26:21 elements [3] - 91:19, 91:21, 140:25 emergent [1] - 83:5 eminent [2] - 256:15, 264:21 emphases [1] - 224:1 employed [5] - 15:18, 15:23, 42:25, 57:22, 196:13 employee [1] - 38:25 employee s [5] - 5:6, 5:7, 85:24, 137:14, 137:23 employe ment [5] - 36:6, 39:15, 47:23, 49:3, 180:10 en [1] - 190:6 enable [1] - 104:11 Enclosed [1] - 159:11 enclosing [1] - 139:19	encounteri ng [2] - 108:3, 141:10 encourage d [1] - 81:25 end [21] - 11:11, 56:25, 62:2, 62:18, 94:5, 97:11, 98:6, 98:14, 143:20, 159:13, 166:22, 176:22, 185:1, 214:9, 220:10, 222:1, 242:13, 245:24, 246:4, 269:9 endeavor [2] - 167:2, 249:2 ended [1] - 143:24 engage [7] - 5:10, 5:20, 61:25, 80:11, 83:9, 148:11, 167:16 engaged [3] - 86:16, 87:9, 104:13 engageme nt [1] - 194:12 engaging [2] - 5:14, 85:16 English [7] - 165:23, 224:9, 234:22, 238:7, 238:12, 238:15, 258:10 enhance [1] - 83:14 enormous [2] - 113:13,	227:19 enroll [12] - 69:12, 102:6, 114:1, 115:25, 116:2, 131:23, 132:13, 167:2, 168:6, 180:18, 180:21, 230:14 enrolled [36] - 45:12, 48:9, 48:21, 62:7, 69:6, 76:7, 116:5, 117:16, 118:14, 118:17, 132:3, 136:22, 136:23, 180:25, 194:18, 199:15, 201:17, 202:17, 203:22, 204:5, 204:6, 204:7, 204:12, 204:13, 204:17, 205:9, 226:19, 228:23, 229:1, 229:16, 230:18, 230:22, 231:2, 243:21, 247:2, 248:12 enrolling [7] - 113:14, 116:10, 120:17, 132:2, 185:18, 193:7, 198:19 enrollment [34] - 19:1, 20:5,	48:11, 55:18, 88:25, 102:7, 109:12, 114:2, 114:13, 114:17, 115:1, 116:7, 118:20, 120:12, 120:23, 131:25, 167:18, 176:21, 181:4, 181:6, 181:8, 181:17, 184:12, 201:14, 201:20, 203:6, 205:18, 211:17, 211:20, 211:23, 226:13, 229:15, 250:18 Enrollmen t [3] - 20:7, 20:12, 45:8 enrollment s [3] - 169:8, 169:13, 226:18 enrolls [3] - 29:9, 113:22, 249:24 ensure [2] - 35:18, 72:2 entails [1] - 197:22 enter [16] - 20:12, 45:11, 45:14, 45:22, 46:1, 46:19, 47:4, 48:2, 58:13, 58:18, 74:20, 100:17, 102:3, 149:25,	230:2, 246:20 entered [17] - 43:18, 45:2, 45:6, 46:17, 46:22, 46:24, 47:10, 47:15, 47:23, 48:3, 48:6, 54:13, 60:11, 68:22, 75:21, 76:4, 170:22 entering [7] - 19:2, 41:11, 46:15, 48:25, 75:4, 98:21, 224:15 entertain [1] - 269:2 entire [12] - 42:25, 48:1, 50:11, 96:19, 107:4, 114:22, 163:3, 224:2, 230:11, 238:15, 246:15, 254:2 entirely [3] - 171:11, 171:20, 242:5 entirety [5] - 43:15, 149:20, 173:4, 205:10, 205:13 entities [8] - 37:8, 37:20, 135:17, 135:23, 137:10, 221:20, 254:22, 258:16 entitled [2] - 160:4,	193:17 entitlemen t [1] - 201:6 entity [2] - 135:21, 149:11 entrance [2] - 249:9, 249:10 entrepren eurs [2] - 81:5, 104:15 entry [23] - 28:25, 29:13, 32:7, 41:9, 45:19, 46:5, 49:10, 53:14, 55:9, 55:11, 55:16, 56:25, 58:21, 59:2, 59:4, 59:20, 61:23, 62:5, 62:6, 62:15, 74:25, 75:6, 109:25 environme nt [4] - 235:7, 249:3, 255:24, 257:13 environme ntal [3] - 108:15, 144:18, 183:10 environme ntally [4] - 144:9, 144:10, 151:21, 151:22 envisione d [4] - 96:11, 104:25, 105:2, 134:18 episodes [1] - 193:24	equally [1] - 266:3 equipment [1] - 150:1 eSchool [1] - 22:17 eSchoolP LUS [10] - 19:3, 19:5, 19:18, 19:23, 20:13, 20:23, 21:5, 32:6, 48:11, 236:4 Esquire [4] - 1:12, 1:13, 1:17, 2:7 ESQUIRE [1] - 77:1 essence [4] - 94:1, 186:6, 186:8, 190:24 essentially [14] - 12:23, 37:5, 43:22, 83:21, 85:16, 93:18, 103:15, 115:6, 128:15, 148:8, 149:8, 173:17, 176:17, 186:17 establish [7] - 11:13, 33:19, 239:7, 240:16, 262:13, 262:22, 267:9 establishe d [3] - 129:24, 216:10, 263:22 estate [1] - 144:13 Estate [1] - 148:4 estimation [1] -	198:16 et [2] - 214:9 ethically [1] - 138:11 evaluate [2] - 256:17, 256:18 evaluated [2] - 13:1, 102:4 evaluating [3] - 254:24, 255:5, 263:18 evaluation [2] - 30:15, 44:18 event [1] - 5:19 eventualit y [1] - 167:22 eventually [1] - 145:9 everywher e [1] - 251:23 evidence [16] - 3:21, 3:23, 4:2, 4:5, 4:9, 4:12, 7:9, 9:22, 10:17, 10:20, 11:12, 11:24, 14:3, 14:12, 14:18, 271:4 Evidence [2] - 31:8, 31:13 evidenti ar [1] - 7:9 ex [4] - 136:19, 162:23, 162:24, 234:23 exact [17] - 24:20, 35:5, 35:11, 38:12, 53:25, 56:12, 57:16, 60:1, 60:14,	62:21, 92:19, 111:24, 112:4, 199:3, 201:12, 226:11 exactly [15] - 25:17, 26:17, 35:1, 132:23, 146:4, 153:25, 176:18, 180:25, 185:2, 225:16, 236:18, 241:8, 262:8, 269:10 Exactly [1] - 269:4 exam [10] - 59:18, 223:19, 227:8, 245:20, 249:9, 249:10, 249:13, 249:14, 256:14 examinati on [8] - 3:24, 10:13, 31:11, 34:15, 51:14, 75:14, 124:24, 217:20 examine [3] - 4:11, 152:18, 211:5 EXAMINE D [1] - 2:3 examined [4] - 9:24, 15:4, 77:3, 219:20 Examiner [2] - 13:21, 32:24 example [15] - 21:14, 187:25, 198:15, 204:9,
---	--	---	--	---	--	---	---	--

212:5, 225:9, 228:2, 229:7, 229:18, 233:16, 234:1, 251:14, 253:19, 254:6, 255:20 exams [10] - 239:1, 239:2, 242:21, 248:21, 253:12, 255:9, 261:9, 262:23, 263:14, 268:18 Exams [5] - 125:20, 126:7, 133:11, 133:16, 209:17 exceed [2] - 126:2, 236:20 except [1] - 187:1 exception [3] - 158:7, 188:16, 192:11 exchangin g [1] - 109:3 excited [3] - 93:22, 96:6 Excuse [1] - 3:9 excuse [2] - 193:12, 255:25 excused [3] - 76:13, 76:14, 219:7 execute [1] - 135:16 executed [2] - 111:6, 145:15 execution [2] - 135:15, 136:3 Executive [4] - 78:21, 79:5,	142:7, 153:16 exhaustiv e [1] - 148:9 Exhibit [112] - 6:5, 8:3, 19:12, 21:10, 23:4, 44:5, 45:2, 45:4, 46:25, 47:4, 47:7, 47:10, 47:16, 49:21, 50:1, 50:3, 50:9, 50:13, 51:8, 51:11, 52:12, 52:17, 53:8, 54:4, 56:3, 56:4, 56:21, 59:12, 68:1, 68:13, 90:1, 94:8, 99:16, 100:21, 105:4, 105:22, 107:8, 108:23, 111:7, 116:20, 119:9, 119:24, 119:25, 121:13, 121:14, 121:15, 121:23, 123:14, 123:23, 124:7, 125:2, 125:3, 130:12, 130:22, 130:24, 132:6, 136:4, 136:5,	137:8, 137:16, 139:4, 139:7, 139:8, 139:21, 141:16, 143:4, 156:16, 156:20, 156:21, 156:23, 156:24, 157:6, 158:19, 158:25, 160:1, 160:21, 166:13, 173:25, 174:24, 175:1, 177:2, 177:10, 178:7, 178:10, 178:24, 180:6, 180:8, 181:21, 186:23, 188:23, 189:2, 189:7, 189:11, 189:18, 189:23, 193:5, 205:23, 206:3, 206:4, 206:6, 207:13, 210:8, 212:20, 214:25, 218:12, 232:23, 233:9, 252:2, 262:25 exhibit [7] - 6:23, 7:5, 8:7, 55:5, 124:2, 124:11, 156:22 EXHIBITS [1] - 2:11 Exhibits [1] - 140:12 exhibits [10] - 4:10, 4:24, 5:2,	12:2, 33:1, 89:11, 192:21, 207:24 exist [3] - 85:14, 203:21, 204:3 existed [1] - 186:5 existence [3] - 49:18, 79:2, 208:13 existing [1] - 209:9 exited [1] - 149:23 exiting [4] - 84:20, 97:12, 98:7, 99:9 expanded [2] - 96:14, 235:15 expect [1] - 217:13 expectatio n [1] - 120:12 expectatio ns [1] - 5:22 expected [1] - 106:10 expecting [1] - 169:11 expects [1] - 125:25 expense [2] - 122:11, 124:2 expenses [2] - 135:25, 218:7 expensive [1] - 128:11 experien e [5] - 31:9, 225:20, 232:10, 246:22, 258:14 experien es [1] - 241:13 experienci	ng [7] - 101:19, 112:15, 112:16, 112:17, 193:24, 194:6, 197:11 expert [1] - 208:15 expertise [1] - 46:11 expiration [1] - 119:17 explain [11] - 20:3, 21:4, 23:19, 26:15, 31:25, 90:13, 106:18, 117:14, 225:22, 236:18, 257:18 explained [4] - 7:24, 148:5, 186:8, 202:7 explaining [2] - 200:15, 267:16 explanatio n [1] - 202:9 explicit [3] - 105:10, 182:17 explicitly [1] - 157:20 expound [1] - 153:2 expressed [5] - 88:18, 92:21, 94:2, 135:10, 183:2 expressin g [1] - 92:21 expressly [1] - 168:24 extended [1] - 239:1 extending [1] - 186:9	extent [5] - 19:21, 29:21, 73:14, 99:8, 195:14 extraordin ary [2] - 106:20, 112:5 extremely [5] - 82:22, 101:17, 128:11, 194:6, 195:7 F facilitated [2] - 40:9, 207:25 facilitator [1] - 232:16 facilitators [1] - 236:10 facilities [1] - 135:21 Facilities [2] - 143:12, 148:4 facility [9] - 13:1, 143:15, 144:17, 144:18, 145:14, 148:7, 148:13, 188:12, 226:21 Facility [1] - 143:12 facing [1] - 224:12 fact [27] - 7:14, 51:14, 110:17, 144:18, 183:3, 187:21, 201:21, 203:8, 203:11, 205:1, 212:4, 215:12, 222:25, 224:13, 225:6,	225:14, 229:12, 232:4, 237:9, 242:18, 245:1, 248:1, 256:1, 257:5, 257:10, 262:16, 268:13 factor [1] - 197:18 factors [1] - 100:16 facts [1] - 100:9 factual [1] - 240:14 factually [1] - 13:11 faculty [6] - 163:22, 163:25, 164:2, 164:3, 232:12, 241:5 fail [1] - 242:10 failure [4] - 112:16, 113:10, 202:13, 202:20 fair [16] - 45:22, 51:23, 52:10, 69:21, 135:3, 171:5, 182:12, 187:7, 190:16, 211:1, 212:1, 232:14, 233:8, 245:15, 245:16, 256:5 fairly [1] - 255:14 faithful [1] - 94:18 faithfully [1] - 157:18 fall [18] - 29:14, 29:23, 33:25,	37:1, 37:11, 37:21, 37:24, 38:12, 56:25, 57:3, 58:23, 59:18, 60:23, 68:22, 69:4, 195:2, 200:7, 242:9 falling [1] - 228:1 falls [1] - 194:18 familiar [15] - 52:7, 67:3, 67:5, 67:7, 67:14, 103:4, 196:2, 196:4, 196:5, 199:13, 210:20, 210:23, 211:2, 211:11, 211:14 far [3] - 9:9, 55:12, 269:8 February [6] - 6:14, 37:25, 87:19, 159:9, 160:15, 162:5 Federal [3] - 31:7, 145:24, 145:25 feed [1] - 266:19 feedback [1] - 111:5 feeder [3] - 226:8, 226:10, 226:11 feeders [1] - 249:8 fees [1] - 135:25 feet [1] - 149:16 fell [1] -	204:18 fellowship s [1] - 81:3 felt [16] - 95:5, 96:5, 96:7, 96:18, 96:19, 128:9, 128:17, 138:19, 175:18, 182:17, 183:22, 187:17, 201:24, 242:24 female [1] - 197:8 few [4] - 42:18, 72:10, 120:8, 150:14 fields [1] - 248:10 fifth [6] - 97:12, 98:6, 98:15, 98:19, 99:7, 214:8 Figueroa [5] - 24:17, 129:18, 148:5, 159:3, 222:21 figure [2] - 54:21, 168:4 figured [1] - 152:12 figuring [1] - 179:25 file [5] - 51:4, 138:25, 192:3, 192:4, 230:18 filed [16] - 16:14, 87:12, 87:15, 92:6, 92:9, 92:10, 99:19, 99:21, 140:16, 142:18,
--	---	---	---	---	--	---	--	---

143:16, 143:17, 166:9, 166:10, 166:25, 213:2 files [4] - 20:11, 46:19, 46:20 filing [3] - 83:18, 140:6, 142:14 fill [1] - 109:20 filled [1] - 201:4 final [7] - 6:19, 21:18, 32:7, 51:24, 130:10, 194:9, 240:6 finally [1] - 8:2 findings [2] - 7:14, 43:23 fine [3] - 76:21, 124:13, 269:13 finished [2] - 43:11, 98:25 firm [4] - 3:4, 78:14, 148:25, 240:3 firmly [1] - 152:23 First [1] - 81:11 first [75] - 3:16, 12:8, 14:24, 15:3, 18:1, 18:8, 19:17, 21:2, 21:9, 21:10, 23:12, 27:11, 45:11, 47:12, 47:16, 47:22,	52:21, 52:24, 55:10, 77:2, 87:13, 97:15, 105:13, 108:9, 111:23, 112:19, 113:5, 114:22, 115:24, 116:20, 116:25, 117:15, 119:1, 119:5, 120:8, 133:7, 136:13, 183:12, 184:11, 193:14, 199:14, 204:18, 204:20, 204:21, 205:11, 207:18, 214:6, 215:11, 216:15, 217:3, 218:19, 219:19, 222:11, 223:10, 223:11, 227:5, 233:13, 234:13, 237:2, 237:9, 238:4, 238:9, 238:10, 240:9, 242:7, 243:19, 243:24, 245:21, 246:17, 247:5, 248:2, 249:2, 249:7, 249:9, 252:22 fiscal [1] - 38:25 fit [2] - 84:25, 255:13	five [8] - 10:13, 27:15, 119:16, 136:24, 160:7, 194:24, 212:9, 260:12 five- minute [1] - 212:9 flag [1] - 40:8 flatteringly [1] - 222:18 flexibility [3] - 144:12, 245:7, 249:18 flip [7] - 21:2, 27:9, 30:3, 95:13, 124:6, 130:12, 228:9 flipped [1] - 50:10 flummoxe d [1] - 121:10 Focus [1] - 238:4 focus [13] - 90:14, 90:19, 90:21, 91:7, 91:11, 100:12, 101:18, 223:18, 235:7, 238:5, 238:8, 238:12, 238:17 focused [7] - 34:11, 84:12, 237:16, 237:19, 238:25, 240:18, 269:7 focusing [3] - 93:22, 106:6, 269:5 folks [11] -	4:11, 43:19, 45:3, 46:4, 46:7, 46:11, 70:7, 160:20, 161:7, 217:13, 217:15 follow [2] - 156:13, 250:11 followed [2] - 156:9, 207:10 following [7] - 6:13, 108:8, 122:14, 126:8, 131:22, 161:8, 241:17 follows [4] - 6:9, 15:5, 77:4, 219:21 food [1] - 108:10 foot [1] - 149:9 footnote [1] - 27:20 footnotes [1] - 53:15 force [2] - 17:13, 40:7 forcing [1] - 209:9 forego [2] - 5:23, 122:19 foregoing [1] - 271:6 forewarne d [1] - 266:11 forget [2] - 253:4, 258:25 forgive [1] - 75:20 form [10] - 20:17, 20:20, 51:24, 66:19, 79:22, 87:23, 114:2, 114:17,	118:21, 218:1 formal [14] - 24:12, 51:14, 70:10, 88:2, 88:10, 88:11, 92:15, 92:18, 92:19, 114:16, 114:23, 114:25, 142:20, 142:22 formally [1] - 71:6 format [2] - 52:7, 232:4 formative [1] - 87:8 formed [5] - 79:1, 103:9, 115:12, 132:24, 153:19 former [3] - 118:1, 232:5, 247:10 forming [2] - 82:1, 86:3 forms [3] - 20:19, 115:1, 211:23 formula [1] - 261:5 forth [25] - 9:22, 14:19, 36:3, 90:4, 103:22, 103:25, 125:23, 126:8, 127:20, 133:12, 157:20, 215:16, 221:3, 222:18, 224:23, 225:3, 232:7, 232:12, 234:3, 234:25,	235:21, 236:14, 236:20, 236:21, 245:6 forthcomi ng [1] - 9:8 forward [3] - 13:24, 74:2, 179:18 foundatio n [4] - 80:19, 83:13, 129:23, 256:10 Foundatio n [1] - 81:7 foundatio nal [2] - 16:25, 107:4 foundatio ns [3] - 80:7, 80:8, 80:11 Founding [1] - 117:10 founding [3] - 82:1, 85:17, 166:20 four [13] - 67:12, 67:13, 98:11, 105:16, 133:17, 133:21, 134:1, 194:18, 199:24, 200:5, 260:11, 260:14, 263:14 Fox [1] - 1:24 frame [4] - 85:13, 163:4, 172:23 framed [6] - 84:2, 85:18, 144:4, 144:7, 152:8, 173:16 framing [3]	- 85:21, 101:14, 207:24 free [2] - 5:8, 238:24 fresh [1] - 239:8 front [10] - 24:1, 69:22, 99:14, 179:23, 199:19, 199:21, 200:2, 231:15, 232:23, 248:16 full [22] - 18:13, 37:6, 38:21, 38:25, 46:20, 46:21, 72:1, 72:2, 73:3, 172:4, 179:6, 220:23, 221:1, 236:11, 238:13, 242:14, 249:21, 258:13, 259:9, 260:1, 260:20, 262:16 Full [5] - 246:21, 258:11, 259:23, 260:15, 262:6 full-blown [2] - 249:21, 260:1 full-time [6] - 18:13, 37:6, 38:21, 38:25, 220:23, 221:1 fully [2] - 46:22, 271:4 function [2] - 57:21,	76:2 functionin g [2] - 98:12, 105:16 functions [2] - 17:20, 17:22 Fund [1] - 81:11 funded [2] - 80:7, 83:13 funding [1] - 81:8 fundraisin g [1] - 80:12 furniture [1] - 150:1 future [1] - 5:10 G G.E.D [1] - 132:4 gathered [1] - 223:5 gathering [2] - 207:24, 223:21 GEN-51 [1] - 119:11 GEN-55 [1] - 94:13 general [4] - 17:23, 23:14, 90:20, 208:22 generally [12] - 23:9, 25:14, 89:25, 115:12, 115:23, 196:4, 198:6, 208:15, 209:5, 246:10, 251:6, 269:9 generate [3] - 58:6, 80:20, 224:1 generated [8] - 49:22, 58:3, 58:8, 80:17,	113:6, 129:9, 141:8, 214:22 generating [2] - 113:12, 173:11 gentleman [3] - 3:3, 266:2, 267:8 gentleman 's [1] - 265:16 gift [1] - 148:19 gifted [4] - 198:4, 198:25, 199:1, 199:5 gifts [1] - 80:19 given [11] - 14:15, 103:15, 128:1, 130:21, 186:7, 218:9, 243:8, 251:5, 253:12, 256:9, 264:7 Glen [1] - 1:24 Goal [7] - 97:10, 97:11, 97:17, 97:19, 169:22, 215:7, 215:10 goal [10] - 97:15, 98:5, 104:17, 105:25, 214:21, 216:10, 216:15, 250:15, 251:24, 268:14 Goals [6] - 97:1, 97:5, 97:8, 104:10, 213:22, 252:12
---	---	--	---	---	--	--	---	---

goals [35] - 12:25, 96:10, 99:4, 100:3, 100:8, 100:20, 100:25, 101:8, 101:14, 128:1, 134:13, 135:4, 135:7, 135:8, 135:9, 169:9, 169:13, 169:15, 191:13, 191:14, 191:20, 192:1, 192:15, 193:4, 206:11, 206:14, 210:10, 210:14, 214:20, 215:16, 215:18, 215:20, 254:17	GPA's [4] - 30:7, 30:8, 66:24, 67:22 gracious [1] - 233:18 Grade [1] - 96:16 grade [87] - 21:19, 25:21, 26:10, 26:19, 27:20, 28:24, 41:10, 48:4, 48:5, 50:7, 50:19, 54:14, 55:12, 58:18, 58:19, 62:5, 67:2, 67:4, 67:12, 70:2, 70:4, 70:6, 74:4, 74:5, 84:12, 84:23, 84:25, 88:23, 88:25, 90:18, 90:22, 91:7, 91:17, 93:21, 97:13, 100:18, 117:7, 117:21, 166:22, 167:3, 167:9, 167:13, 167:19, 167:20, 168:7, 168:14, 168:19, 169:7, 169:8, 169:10, 169:12, 169:20, 169:23,	170:7, 170:8, 170:17, 170:19, 170:22, 170:23, 171:3, 171:9, 171:18, 171:25, 204:10, 216:6, 225:11, 225:12, 225:13, 229:7, 229:13, 229:14, 230:3, 239:2, 242:22, 248:6, 251:15, 253:22, 259:4, 259:12, 264:25, 265:11, 268:7, 268:9, 268:10 grade- wise [1] - 117:21 grader [7] - 48:3, 48:4, 167:16, 230:1, 230:9, 230:15, 230:25 graders [13] - 25:23, 26:22, 98:7, 99:6, 99:10, 101:1, 101:5, 169:16, 229:9, 229:10, 229:18, 229:19, 254:2 Grades [15] - 50:15, 94:25, 95:19, 95:22, 96:9, 96:10, 96:13,	109:11, 109:24, 110:6, 110:9, 110:16, 131:21, 174:11, 176:20 grades [12] - 18:24, 27:15, 34:11, 46:15, 50:13, 50:17, 104:21, 117:13, 169:14, 170:12, 201:17, 224:6 grading [3] - 236:2, 236:25 graduate [1] - 91:18 graduated [2] - 78:13, 85:4 graduates [1] - 80:3 graduatio n [1] - 104:21 grant [2] - 120:15, 151:3 granted [9] - 95:6, 101:4, 134:11, 172:9, 174:4, 178:18, 178:20, 191:18, 191:23 granting [3] - 100:25, 134:6, 174:2 grants [2] - 80:19, 81:6 Graph [1] - 58:13 graph [25] - 54:3, 54:5, 54:17, 56:14, 56:16, 56:23, 57:6,	57:7, 57:15, 57:19, 57:25, 60:18, 60:19, 61:18, 63:14, 64:19, 65:14, 65:17, 65:20, 66:23, 68:15, 69:14, 69:22, 69:23, 73:15 graphs [7] - 32:11, 33:6, 59:1, 60:7, 60:8, 60:25, 61:3 grass [2] - 79:10, 82:19 great [3] - 113:2, 184:5, 246:3 greater [1] - 17:12 GROUP [1] - 1:12 Group [2] - 12:13, 12:15 group [15] - 55:13, 59:20, 62:12, 85:20, 120:20, 198:11, 207:20, 217:21, 235:1, 235:22, 245:6, 255:18, 264:12, 269:1, 269:6 groups [3] - 251:12, 251:13, 265:3 grown [1] - 227:22 growth [16] - 126:3,	126:23, 126:25, 227:6, 255:9, 255:21, 255:24, 256:1, 256:10, 256:11, 256:12, 256:17, 256:18, 262:12, 265:10, 269:3 Growth [2] - 16:6, 40:12 guess [7] - 18:4, 63:20, 94:21, 138:22, 224:22, 247:5, 263:3 guessing [1] - 236:4 Guida [3] - 146:7, 146:14 Guidance [1] - 20:8 guidelines [1] - 90:5 guy [1] - 251:13 guys [3] - 266:8, 266:9, 266:13	handled [1] - 144:3 happily [1] - 233:17 happy [1] - 53:21 Harcum [6] - 79:22, 86:17, 135:16, 135:20, 164:3 hard [2] - 93:24, 264:14 Harrisburg [1] - 258:25 Haverford [1] - 165:23 Hazleton [1] - 258:24 head [1] - 162:24 heading [5] - 97:7, 213:22, 238:1, 239:25, 240:21 headquart ers [1] - 149:10 Heads [1] - 237:3 health [1] - 108:9 hear [5] - 5:16, 8:15, 14:3, 191:6, 263:25 heard [6] - 14:11, 14:17, 41:8, 205:8, 254:10, 267:8 hearing [23] - 3:14, 3:20, 4:22, 5:5, 5:15, 6:7, 6:10, 6:14, 7:16, 8:6, 8:8, 8:11, 9:17, 10:9, 14:13,	53:2, 76:17, 87:18, 92:18, 92:19, 267:6, 268:23 HEARING [68] - 1:1, 3:2, 3:13, 8:18, 8:24, 10:10, 11:15, 11:18, 12:11, 12:16, 14:7, 14:23, 17:1, 22:2, 23:1, 23:5, 26:13, 31:5, 31:12, 31:22, 34:15, 71:3, 71:10, 73:9, 74:8, 74:18, 75:11, 75:18, 75:25, 76:11, 76:16, 76:22, 93:12, 93:17, 118:3, 118:6, 124:8, 124:14, 124:18, 124:21, 127:10, 127:17, 127:22, 129:25, 131:6, 151:3, 152:18, 206:4, 211:8, 212:12, 212:16, 219:6, 219:9, 219:12, 221:10, 221:14, 221:17,	229:23, 261:22, 263:24, 265:14, 266:24, 268:23, 269:5, 269:11, 269:16, 269:19, 269:22 Hearing [14] - 1:3, 2:6, 3:7, 6:4, 7:5, 7:6, 7:21, 8:2, 8:15, 9:1, 9:4, 13:21, 32:24, 54:25 hearings [6] - 7:11, 10:7, 92:8, 92:11, 92:15 hearsay [5] - 93:10, 117:24, 127:8, 261:21, 268:21 held [11] - 3:12, 4:15, 6:17, 17:11, 77:16, 124:17, 131:5, 143:8, 212:14, 219:15, 269:25 help [7] - 79:22, 85:1, 86:8, 107:4, 203:13, 235:7, 266:18 helpful [4] - 226:20, 265:20, 266:5, 267:21 hereby [1] - 271:3 herein [2] - 132:1, 133:22 hereto [3] -
--	---	--	---	--	--	---	---	---

108:21, 123:22, 177:13 high [19] - 48:1, 82:22, 85:5, 91:17, 104:12, 112:15, 132:4, 170:6, 170:12, 221:24, 223:7, 253:12, 253:18, 255:14, 257:5, 257:6, 268:2, 268:4 High [17] - 67:16, 88:23, 90:18, 117:8, 126:4, 171:3, 196:3, 196:7, 196:9, 196:10, 196:18, 196:22, 196:25, 197:4, 197:8, 200:24, 212:5 Higher [1] - 164:18 higher [3] - 79:14, 80:18, 195:22 highest [1] - 247:15 highly [2] - 194:11, 200:24 Hills [1] - 11:5 himself [3] - 127:8, 165:11, 209:23 hire [1] - 144:23 hired [2] - 35:24, 80:9 Hispanic [1] -	198:14 historical [1] - 91:14 history [12] - 36:6, 113:3, 114:7, 153:1, 193:20, 226:19, 227:7, 228:25, 230:4, 231:5, 231:8, 262:17 HO-1 [3] - 2:13, 6:5, 6:21 HO-2 [3] - 2:14, 6:23, 7:17 HO-3 [2] - 2:15, 7:19 HO-4 [1] - 2:16 hold [7] - 7:10, 31:1, 40:15, 100:21, 151:6, 166:1, 263:19 holes [1] - 172:4 homeless [1] - 194:13 homeless ness [2] - 106:22, 197:12 homeroo m [1] - 238:9 homogene ous [4] - 255:18, 256:23, 257:1, 257:3 honest [3] - 168:8, 171:10, 208:9 honestly [4] - 43:3, 167:4, 170:10, 254:21 honor [1] - 202:8	hope [2] - 14:4, 180:2 hoped [1] - 101:12 hopefully [1] - 225:20 hopes [1] - 158:17 host [1] - 14:6 hotly [1] - 209:7 hour [3] - 76:20, 235:17, 265:18 hours [2] - 83:21 housed [1] - 222:6 huge [1] - 264:15 hum [8] - 116:21, 139:9, 215:8, 237:24, 247:18, 257:17, 263:1, 263:10 human [1] - 104:5 hundred [8] - 63:19, 64:11, 65:2, 73:18, 138:20, 228:4, 268:14 hundreds [2] - 47:5, 114:18 Huntingdo n [1] - 1:14 I I-LEAD [166] - 1:1, 1:20, 3:8, 3:17, 4:6, 6:12, 7:2, 8:1, 12:10, 12:20, 13:18, 15:19, 15:20, 15:23, 20:15,	24:15, 26:18, 27:14, 27:25, 28:8, 28:25, 29:4, 29:6, 29:9, 33:16, 34:8, 34:22, 36:8, 37:2, 38:5, 39:18, 39:21, 39:24, 40:3, 40:8, 45:12, 45:15, 45:23, 47:19, 48:9, 48:21, 49:11, 49:17, 49:22, 55:12, 55:17, 59:17, 60:11, 60:16, 67:7, 67:17, 73:16, 77:10, 77:16, 78:21, 78:23, 78:24, 79:4, 79:6, 79:7, 79:18, 80:14, 80:16, 81:18, 82:15, 82:17, 85:10, 85:14, 85:22, 86:7, 86:22, 94:24, 99:9, 99:21, 102:23, 107:13, 108:20, 113:11, 113:22,	116:14, 119:16, 123:4, 126:19, 127:4, 127:13, 130:22, 135:16, 136:17, 137:3, 137:4, 137:11, 137:25, 138:1, 138:12, 138:13, 141:18, 148:16, 148:20, 148:25, 150:20, 153:1, 153:15, 153:19, 156:14, 158:2, 159:3, 159:12, 160:4, 160:22, 160:24, 161:1, 162:18, 163:8, 163:13, 163:16, 163:19, 163:24, 164:8, 164:16, 164:25, 165:2, 174:10, 177:12, 195:6, 198:19, 198:25, 199:5, 199:8, 199:15, 200:25, 201:16, 203:3, 209:4, 217:21, 218:1, 218:2, 218:3, 218:23, 218:24, 218:25, 220:1, 220:8, 220:11,	220:13, 222:24, 224:12, 225:5, 225:24, 227:19, 230:9, 230:12, 230:14, 231:6, 240:24, 251:20, 257:1, 259:3, 259:18, 261:12, 263:18, 264:4, 265:25 I-LEAD's [5] - 7:22, 46:15, 79:8, 100:4, 120:13 I.2.A [1] - 97:7 ID [1] - 248:13 idea [9] - 178:19, 235:6, 241:12, 246:16, 249:17, 251:13, 259:1, 259:11, 261:3 ideas [4] - 198:13, 236:2, 249:6, 249:20 identified [17] - 44:24, 50:13, 64:8, 70:7, 160:20, 166:10, 174:1, 178:6, 180:15, 186:22, 192:8, 199:1, 213:14, 238:8, 242:21, 244:4 identify [16] - 4:23,	12:7, 30:12, 47:6, 47:9, 47:15, 55:19, 57:18, 70:12, 191:14, 206:8, 235:2, 236:10, 243:20, 243:22, 252:11 iffy [2] - 228:8, 228:14 II [1] - 21:14 III.2 [1] - 136:9 ILCS [8] - 27:14, 55:10, 55:16, 55:17, 56:25, 139:24, 159:23, 234:13 Illinois [2] - 221:16 illustrate [1] - 141:9 imagine [1] - 102:13 imagined [1] - 106:16 imbedded [1] - 27:6 immediate ly [3] - 95:9, 149:19, 222:19 impact [3] - 23:11, 24:21, 253:17 impacted [1] - 253:15 impede [2] - 100:16, 194:11 imperfecti on [1] - 64:18 implement ation [1] - 122:4 implement	ing [1] - 211:12 important [10] - 73:24, 100:7, 107:2, 175:12, 191:2, 208:7, 241:4, 244:24, 244:25, 249:2 importantl y [1] - 96:11 impose [1] - 122:6 imposed [2] - 128:23, 192:16 impressio n [3] - 186:15, 253:14, 254:20 improve [4] - 79:8, 126:1, 214:7, 262:23 improved [1] - 99:12 improvem ent [3] - 91:24, 255:1, 262:12 improving [2] - 223:18, 235:23 inappropri ate [2] - 264:2, 264:3 Inc [50] - 15:19, 15:20, 15:24, 16:4, 36:8, 37:2, 38:5, 39:19, 39:22, 39:24, 40:3, 40:8, 78:21, 78:23, 79:4,	79:6, 79:18, 80:15, 80:22, 81:18, 82:15, 85:12, 85:14, 86:7, 135:16, 137:11, 137:25, 138:1, 138:13, 148:16, 148:20, 148:25, 153:1, 153:16, 153:19, 153:24, 163:13, 163:17, 163:20, 163:24, 164:8, 164:11, 164:16, 164:25, 165:3, 218:21, 218:22, 218:23, 218:24, 218:25 Inc's [3] - 79:7, 137:3, 163:9 inception [5] - 75:2, 77:21, 78:1, 154:19, 163:14 inclement [1] - 6:16 include [6] - 62:13, 83:7, 95:25, 100:2, 206:11, 207:21 included [20] - 20:8, 22:7, 45:3, 49:22, 52:21, 57:19, 61:3, 64:20, 65:17,
--	--	---	--	---	--	---	--	--

68:10, 68:12, 152:9, 158:24, 159:19, 191:14, 193:5, 210:14, 234:3, 245:17, 247:25 including [16] - 7:4, 7:17, 9:23, 13:3, 16:8, 18:5, 53:10, 85:25, 96:23, 106:21, 108:15, 110:20, 129:17, 135:18, 135:23, 217:14 incoherent [1] - 206:19 income [8] - 79:15, 79:23, 83:5, 85:1, 86:8, 109:18, 197:19, 197:20 incoming [24] - 18:23, 25:18, 25:19, 25:23, 26:5, 26:18, 26:22, 27:14, 27:25, 28:8, 28:20, 28:23, 29:1, 29:5, 44:2, 48:3, 53:13, 53:17, 55:16, 225:8, 225:18, 247:7,	257:23, 262:23 inconsistent nt [3] - 118:10, 173:19, 177:1 incorporat e [2] - 103:11, 104:6 incorporat ed [2] - 206:17, 207:3 incorrect [2] - 45:17, 245:22 increase [9] - 27:15, 32:20, 61:25, 104:24, 126:7, 133:17, 133:20, 134:1, 263:14 increased [5] - 32:12, 32:17, 66:15, 98:11, 105:15 increases [2] - 60:24, 66:16 incredible [1] - 255:1 independe nt [2] - 141:20, 142:15 independe ntly [1] - 176:1 indicate [4] - 157:7, 158:4, 174:14, 187:9 indicated [13] - 45:2, 51:13, 61:17, 120:16, 122:5, 123:23, 153:3, 168:2, 172:9, 208:19, 234:4, 247:13,	253:14 indicates [3] - 176:5, 215:23, 216:22 indicating [3] - 6:25, 116:18, 188:4 indicating [3] - 19:9, 111:11, 143:10 indication [1] - 48:8 Indicators [2] - 214:1, 215:12 individual [9] - 21:7, 63:25, 64:5, 64:8, 66:6, 80:19, 192:19, 249:5, 251:11 individual s [2] - 129:15, 164:7 induce [1] - 81:18 inform [2] - 42:7, 62:10 informal [1] - 24:10 informatio n [57] - 14:18, 18:24, 20:6, 21:4, 33:8, 41:10, 42:15, 44:1, 44:3, 46:2, 46:20, 46:21, 47:4, 47:10, 47:14, 47:21, 48:4, 48:5, 48:12, 48:25, 50:7, 52:16, 54:5,	54:6, 56:7, 70:20, 76:4, 90:4, 140:18, 142:6, 161:11, 161:13, 161:20, 170:19, 182:20, 199:20, 199:21, 203:4, 207:21, 208:18, 213:13, 217:6, 223:25, 225:8, 226:25, 229:15, 231:1, 238:13, 247:7, 247:8, 249:17, 261:19, 266:19, 266:20, 267:21, 268:8 informatio n [1] - 226:15 informed [2] - 32:1, 242:20 informing [1] - 65:15 inhabits [1] - 13:2 initial [5] - 18:24, 29:13, 87:20, 120:15, 182:7 initials [3] - 47:18, 48:17, 49:7 initiated [1] - 234:5 initiative [1] - 40:11 Initiative [2] - 16:6, 40:12 input [1] - 229:15 inquiry [1] - 115:20	inside [1] - 149:12 insight [1] - 226:23 instance [4] - 237:6, 242:4, 251:15, 264:24 instead [2] - 85:11, 269:5 Institute [7] - 78:24, 86:25, 97:25, 136:15, 174:6, 218:20, 218:22 instituted [1] - 236:3 instituting [1] - 7:1 institution [14] - 85:21, 95:10, 96:8, 101:15, 107:4, 107:7, 128:13, 134:12, 134:18, 135:6, 135:11, 173:19, 202:10, 264:4 institution' s [1] - 209:13 institution al [1] - 209:25 institution s [5] - 86:15, 137:21, 155:15, 195:9, 209:12 instructio n [12] - 33:22, 34:6, 42:8, 73:23, 73:25, 74:12, 74:14, 125:22, 133:12,	221:25, 224:1, 236:24 instructio nal [3] - 236:2, 238:5, 243:8 Instructio nal [1] - 238:4 instructio ns [1] - 244:8 Insurance [1] - 148:3 integral [1] - 104:7 integrates [1] - 104:15 intellectua lly [1] - 107:1 intend [1] - 116:14 intended [5] - 24:11, 24:18, 68:7, 193:1, 256:8 intends [1] - 116:15 intense [2] - 222:17, 242:19 intensive [6] - 82:4, 84:3, 89:3, 185:7, 192:5, 258:9 intensively [1] - 104:23 intent [4] - 13:22, 117:6, 150:24, 262:4 intention [3] - 90:14, 91:5, 262:8 intentional ly [1] - 144:12 interacted [1] - 83:24 interest [4] - 91:16,	104:1, 104:2, 152:5 interested [6] - 14:13, 90:17, 113:14, 148:6, 148:12, 170:21 interesting [1] - 265:19 interfaced [2] - 17:21, 57:22 interfere [1] - 5:15 interject [1] - 165:5 interjected [1] - 165:6 interlockin g [1] - 223:20 intermedia te [1] - 262:18 internal [4] - 214:23, 250:10, 260:4, 260:6 Internal [1] - 54:12 internally [1] - 98:9 internship [2] - 16:6, 40:12 interpretat ion [1] - 234:6 interrupt [1] - 3:10 interruptin g [2] - 93:10, 269:12 intersects [1] - 237:17 intervals [1] - 136:20 Interventio n [2] - 210:24, 211:12 interventio n [1] - 258:2 intimately [2] - 53:23,	196:5 introduce d [2] - 128:15, 257:22 intuitive [1] - 261:19 investigati on [1] - 222:17 invited [3] - 144:16, 148:6, 150:19 invoice [1] - 114:5 invoiced [1] - 118:23 invoices [3] - 114:9, 114:12, 212:4 invoicing [2] - 211:20, 211:24 involved [27] - 16:13, 17:1, 17:6, 17:23, 21:1, 43:20, 44:7, 44:10, 44:16, 46:4, 74:11, 74:14, 75:3, 128:15, 142:6, 142:7, 150:4, 192:5, 200:14, 207:18, 208:3, 231:22, 234:20, 245:13, 252:9, 268:3 involveme nt [2] - 20:2, 20:3 involves [1] - 100:13 involving [1] - 3:7 issue [35] - 4:3, 7:8, 8:18, 9:3,	10:23, 13:6, 13:7, 88:2, 110:18, 115:9, 116:11, 132:21, 132:22, 145:20, 145:21, 145:22, 147:4, 173:8, 191:5, 223:21, 225:14, 226:3, 230:17, 241:9, 243:6, 246:7, 249:23, 250:1, 257:10, 262:11, 262:15, 264:6, 265:2, 267:18 issued [1] - 172:13 issues [19] - 3:14, 9:10, 10:5, 10:8, 11:22, 12:24, 13:3, 13:5, 31:15, 180:3, 183:20, 194:11, 197:4, 200:9, 203:19, 209:8, 232:19, 241:9, 257:9 issuing [1] - 41:15 it'd [1] - 225:13 item [2] - 6:24, 7:20 Item [2] - 2:14, 159:21 items [3] - 108:8, 181:2,
---	---	---	---	--	---	---	--	--

90 of 109 st²⁰ ;

137:3, 137:4, 137:11, 137:25, 138:1, 138:12, 138:13, 141:18, 148:16, 148:20, 148:25, 150:20, 153:1, 153:15, 153:19, 156:14, 158:2, 159:3, 159:12, 160:4, 160:22, 160:24, 161:1, 162:18, 163:8, 163:13, 163:16, 163:19, 163:24, 164:8, 164:16, 164:25, 165:2, 174:10, 177:12, 195:6, 198:19, 198:25, 199:5, 199:8, 199:15, 200:25, 201:16, 203:3, 209:4, 217:21, 218:1, 218:2, 218:3, 218:23, 218:24, 218:25, 220:1, 220:8, 220:11, 220:13, 222:24, 224:12, 225:5, 225:24, 227:19, 230:9, 230:12, 230:14,	231:6, 240:24, 251:20, 257:1, 259:3, 259:18, 261:12, 263:18, 264:4, 265:25, lead [5] - 30:21, 85:20, 91:23, 225:20, 229:20 Lead [2] - 42:20, 46:12 LEAD's [5] - 7:22, 46:15, 79:8, 100:4, 120:13 leader [1] - 236:22 leaders [10] - 83:6, 83:22, 104:14, 113:1, 234:22, 235:16, 235:20, 236:1, 237:16, 248:20 Leadershi p [7] - 78:25, 86:25, 97:25, 136:15, 174:6, 218:20, 218:22 leadership [15] - 34:12, 79:9, 79:11, 80:9, 82:18, 83:3, 83:4, 83:6, 83:7, 83:10, 91:22, 104:2, 130:6, 188:10, 208:1	Leading [1] - 26:12 leading [8] - 16:24, 22:1, 30:23, 31:10, 82:5, 85:16, 120:15, 150:15 learn [1] - 222:11 learner [4] - 34:7, 56:24, 136:24, 200:24 Learners [1] - 55:11 learners [27] - 25:18, 26:5, 27:14, 28:20, 29:1, 53:13, 53:17, 54:13, 59:16, 60:8, 68:21, 70:5, 79:23, 80:2, 85:1, 86:8, 97:13, 97:20, 97:22, 105:7, 136:23, 240:24, 244:19, 247:7, 255:15, 257:10, 257:23 learning [3] - 74:6, 194:7, 236:10 lease [2] - 144:15, 145:14 leased [1] - 149:20 least [11] - 14:15, 25:21, 98:11, 105:16, 132:16,	154:1, 195:2, 214:6, 244:6, 251:25, 265:1 leave [2] - 5:21, 138:23 led [3] - 84:4, 95:3, 148:19 left [7] - 12:1, 43:3, 60:16, 78:16, 102:17, 167:18, 220:22 Left [1] - 268:15 legal [16] - 8:20, 90:19, 93:8, 93:23, 109:23, 153:12, 167:11, 173:11, 179:22, 181:10, 181:11, 201:5, 201:6, 201:22, 207:10, 209:18 Legal [2] - 12:13, 12:15 LEGAL [1] - 1:12 legally [14] - 13:10, 84:13, 84:16, 91:9, 91:10, 109:21, 120:19, 138:10, 140:16, 140:22, 141:5, 175:22, 175:23, 201:2 legislation [1] - 40:6 legislators [1] -	209:22 length [1] - 191:12 lengths [1] - 112:5 less [10] - 63:2, 69:17, 115:3, 172:1, 184:21, 194:24, 195:20, 216:14, 257:4 lessons [2] - 27:6, 61:25 Letter [2] - 2:16, 130:22 letter [52] - 8:3, 8:20, 21:18, 67:11, 90:3, 90:23, 91:3, 92:3, 93:4, 96:24, 116:13, 116:17, 118:11, 120:4, 120:25, 121:6, 123:20, 123:22, 123:23, 123:24, 125:6, 125:8, 127:14, 127:20, 130:25, 131:1, 137:9, 146:12, 146:13, 146:14, 146:15, 156:6, 157:14, 157:20, 157:24, 158:2, 158:4, 158:12, 158:24, 159:3, 159:6, 159:11, 159:19,	161:8, 161:12, 171:7, 189:11, 189:19, 189:21, 190:23, 192:11 letters [1] - 113:19 letting [1] - 165:14 level [32] - 25:22, 26:10, 26:20, 26:21, 27:8, 27:21, 28:19, 42:18, 54:14, 55:12, 61:24, 62:1, 62:2, 62:6, 70:6, 72:22, 74:3, 74:4, 74:5, 82:19, 83:10, 88:25, 99:13, 128:14, 194:3, 197:21, 216:6, 249:22, 257:24, 258:6, 262:19 levels [27] - 25:21, 26:5, 26:6, 27:5, 27:15, 27:25, 28:3, 28:4, 28:17, 28:24, 29:17, 33:20, 55:11, 58:18, 58:19, 70:2, 70:4, 73:5, 98:12,	100:18, 105:16, 204:10, 247:14, 249:19, 262:13 LEVIN [1] - 1:12 Levin [2] - 12:13, 12:15 lexile [6] - 26:4, 27:5, 61:24, 62:1, 72:22 Lexile [1] - 26:5 license [1] - 78:18 licensed [1] - 78:9 life [8] - 34:12, 61:22, 79:9, 104:16, 114:15, 186:9, 230:2, 230:11 likelihood [2] - 194:24, 228:24 likely [10] - 112:18, 194:11, 228:5, 228:6, 228:14, 230:6, 239:4, 243:5, 244:5, 244:6 likewise [1] - 237:2 limit [2] - 181:4, 187:11 limitation [4] - 174:15, 181:3, 181:8, 205:3 limitations [1] - 181:17 limited [6] - 10:14, 108:15,	117:20, 117:21, 135:23, 181:5 line [3] - 63:21, 135:19 lines [3] - 138:17, 184:17, 213:25 list [8] - 41:20, 58:2, 64:5, 106:22, 194:14, 231:10, 243:19, 262:23 listed [9] - 21:24, 32:4, 66:4, 152:12, 160:7, 231:1, 233:5, 233:21, 253:13 listen [2] - 168:13, 172:24 lists [2] - 8:7, 257:21 Lit [2] - 258:12, 258:13 literacy [7] - 18:25, 97:23, 98:11, 104:25, 105:8, 105:15, 230:7 Literature [1] - 126:12 literature [1] - 126:21 litigated [1] - 11:10 litigation [3] - 124:2, 128:16, 128:20 Litts [3] - 1:3, 3:3, 12:19 lives [2] - 24:22,	106:25 living [2] - 121:12, 202:8 Local [3] - 4:16, 31:6, 31:13 local [4] - 83:15, 83:24, 86:1, 241:12 locate [1] - 82:16 located [4] - 144:25, 149:9, 149:13, 193:22 LOCATIO N [1] - 1:7 location [19] - 18:19, 144:11, 147:17, 151:23, 151:25, 152:6, 152:9, 152:12, 152:15, 182:21, 183:2, 183:7, 183:11, 183:12, 187:9, 187:11, 187:14, 188:1, 188:25 locations [1] - 144:6 locked [2] - 42:11, 75:4 log [3] - 5:2, 236:9, 251:2 logistics [3] - 3:15, 5:4, 234:25 longitudin ally [1] - 66:14 look [23] - 30:7, 47:16, 47:20, 55:22, 55:24,
---	--	--	---	--	--	---	---	--

56:23, 102:1, 132:6, 140:13, 173:24, 176:4, 202:14, 213:21, 214:15, 214:17, 215:22, 223:16, 225:5, 225:19, 226:9, 228:3, 243:14, 266:10 looked [7] - 52:22, 53:4, 53:23, 180:24, 226:14, 232:21 looking [19] - 11:9, 21:9, 46:25, 53:19, 56:14, 60:23, 69:14, 84:18, 99:3, 104:4, 104:5, 104:20, 104:21, 112:14, 125:5, 227:6, 243:4, 247:7 looks [4] - 59:1, 102:16, 226:8, 233:7 Lord [1] - 3:4 Lori [2] - 1:23, 271:12 loss [1] - 129:8 lost [1] - 163:2 love [1] - 248:4 loved [1] - 246:15 low [9] - 79:15,	79:23, 83:5, 85:1, 86:8, 106:7, 109:17, 197:19, 197:20 low- income [2] - 197:19, 197:20 lower [2] - 28:19, 32:12 lowest [3] - 102:12, 112:21, 257:24 lunch [5] - 76:20, 124:9, 124:15, 124:20, 124:23 M M.B.A [1] - 40:20 ma'am [3] - 45:2, 74:19, 76:14 machinery [1] - 236:13 magic [2] - 202:21, 202:22 mail [7] - 139:13, 139:16, 140:1, 140:3, 142:19, 192:17, 268:20 main [6] - 12:23, 13:16, 37:16, 79:17, 86:17, 197:25 maintaine d [2] - 51:6, 78:18 major [4] - 81:6, 165:23, 246:12,	249:22 majority [7] - 26:18, 27:13, 28:8, 45:9, 60:6, 62:16, 242:14 make-up [2] - 72:15, 242:6 make-ups [1] - 251:24 manage [2] - 167:5, 167:7 managem ent [4] - 19:6, 83:9, 107:19, 201:14 Managem ent [3] - 136:11, 226:15 Manager [3] - 20:7, 20:12, 45:8 Manheim [2] - 221:12, 224:18 manifeste d [1] - 115:19 manifestin g [2] - 93:20 manner [4] - 67:19, 67:20, 68:1, 196:25 manners [1] - 136:1 March [11] - 37:24, 39:11, 39:12, 39:14, 40:4, 43:2, 45:19, 45:20, 45:23, 45:25, 87:21 mark [3] - 6:4, 28:13,	28:24 marked [3] - 6:21, 7:18, 64:11 Market [1] - 1:18 marketing [5] - 16:8, 17:20, 36:25, 37:3, 37:15 marking [1] - 6:22 Masons [1] - 1:13 Massachu setts [1] - 225:3 masse [1] - 190:6 match [1] - 228:13 material [5] - 16:8, 74:3, 74:4, 142:25, 192:24 materially [1] - 206:20 materials [2] - 17:20, 36:25 math [28] - 28:3, 28:17, 28:18, 28:19, 32:16, 32:19, 55:9, 55:11, 104:24, 220:9, 220:19, 220:20, 221:24, 222:17, 223:17, 224:8, 224:10, 238:16, 240:18, 240:25, 246:19, 247:1, 251:12, 251:15, 253:22, 260:11, 263:16,	264:25 Math [6] - 220:21, 220:22, 223:10, 223:12, 234:22, 238:17 mathemati cal [4] - 28:2, 28:3, 28:21, 28:24 mathemati cs [5] - 97:23, 105:8, 169:24, 238:5, 238:6 matter [8] - 3:7, 14:20, 26:21, 70:5, 106:25, 188:17, 190:20, 190:24 matters [8] - 6:20, 7:11, 8:10, 8:15, 9:10, 9:24, 137:23, 208:15 McCoy [2] - 144:23, 146:23 mean [34] - 5:12, 18:15, 26:16, 29:2, 31:7, 60:10, 80:23, 85:19, 85:22, 101:12, 106:19, 116:10, 153:8, 157:15, 161:17, 165:8, 176:16, 198:12, 199:17, 209:20, 211:22,	224:22, 225:24, 228:20, 234:8, 238:6, 239:12, 241:10, 247:11, 254:4, 257:5, 264:5, 266:25 meaning [11] - 26:5, 29:3, 52:19, 168:3, 208:5, 209:6, 209:10, 222:21, 232:23, 250:3 meaningfu l [3] - 96:20, 101:25, 135:11 means [7] - 60:11, 63:22, 109:4, 153:9, 161:13, 226:2, 229:17 meant [5] - 13:22, 176:12, 241:23, 252:20, 252:22 Measurabl e [1] - 97:1 measurabl e [5] - 100:7, 104:17, 104:18, 104:20, 105:11 measure [20] - 26:4, 27:4, 29:16, 33:13, 98:14, 102:15, 105:25, 106:5, 107:6, 134:22, 135:11, 244:24,	244:25, 255:16, 255:19, 256:24, 262:7, 265:11, 267:7, 267:11 measured [6] - 32:16, 62:2, 98:5, 98:12, 105:16, 256:11 measur ent [3] - 266:7, 266:8, 267:7 measur ents [1] - 107:5 measures [6] - 28:1, 28:17, 129:7, 209:14, 244:17, 256:14 measuring [3] - 127:2, 215:19, 262:12 media [1] - 5:8 meet [14] - 74:1, 95:9, 102:9, 125:21, 126:2, 128:14, 131:24, 133:11, 216:10, 235:9, 245:10, 259:2, 265:10 meeting [26] - 6:25, 7:20, 83:25, 88:5, 88:6, 89:4, 92:25, 95:5, 114:12, 142:24, 144:21, 145:2, 145:3,	146:25, 148:5, 150:15, 191:10, 233:18, 235:10, 235:15, 235:17, 236:23, 237:2, 237:16, 237:19 Meeting [1] - 2:15 meetings [17] - 71:15, 83:21, 115:5, 115:6, 115:7, 115:8, 130:9, 144:19, 144:20, 150:8, 161:17, 185:7, 185:15, 190:23, 192:18, 235:24 meets [1] - 200:19 member [20] - 16:16, 77:18, 77:20, 77:21, 123:3, 136:16, 136:19, 136:21, 138:24, 155:3, 158:1, 160:16, 160:23, 162:23, 163:23, 164:1, 164:2, 164:4, 198:10, 208:21 Members [1] - 160:5 members [57] - 5:5, 5:7, 25:7, 25:8, 32:5, 46:23,	81:24, 82:10, 82:13, 83:17, 83:23, 87:10, 88:6, 89:5, 92:12, 92:14, 114:16, 115:2, 115:5, 115:10, 118:1, 129:2, 129:7, 129:15, 129:17, 130:3, 130:6, 132:22, 132:25, 136:21, 136:24, 137:12, 137:24, 142:5, 142:8, 144:16, 150:9, 150:15, 150:17, 152:4, 156:14, 159:22, 160:7, 161:22, 162:18, 163:7, 164:7, 171:22, 171:24, 173:9, 179:20, 184:9, 184:17, 185:20, 192:6, 192:20, 232:12 membersh ip [1] - 156:6 memory [3] - 43:11, 67:11, 69:13 mental [1] - 108:9 mentioned [9] - 45:7, 58:22, 86:5,
---	---	--	---	--	--	--	--	--

95:19, 157:23, 195:2, 198:24, 200:17, 234:12 merely [2] - 106:23, 256:3 message [1] - 66:14 met [6] - 101:23, 112:2, 129:14, 129:16, 129:18, 150:16 methods [1] - 127:2 metric [1] - 264:17 metrics [3] - 126:3, 126:8, 264:3 micropho ne [1] - 3:10 middle [5] - 60:17, 221:23, 229:8, 233:12, 234:2 might [6] - 60:17, 60:20, 168:6, 204:10, 254:20, 257:3 Miles [3] - 185:10, 185:11, 185:17 Mill [1] - 1:13 million [1] - 80:17 mind [3] - 31:14, 221:19, 254:15 mindset [1] - 170:20 mine [2] - 44:21, 156:22 minimum [2] - 62:23, 126:7 minority [5] - 194:22,	198:11, 199:2, 223:7, 257:7 minute [4] - 185:21, 193:6, 212:9, 256:19 minutes [1] - 248:18 Minutes [2] - 155:25, 156:1 minutiae [1] - 237:21 miracle [1] - 246:3 missed [4] - 15:9, 45:10, 94:1, 135:19 misses [1] - 251:9 missing [1] - 198:6 mission [16] - 34:8, 34:22, 34:23, 35:6, 35:8, 35:9, 35:11, 36:2, 79:7, 79:8, 81:16, 84:7, 85:1, 86:7, 91:11, 202:9 Mississippi i [2] - 225:1, 225:2 mistake [1] - 75:20 misunders tand [1] - 50:16 mix [1] - 264:9 model [3] - 104:15, 171:15, 227:10 modificati on [1] - 95:7	modified [2] - 103:23, 178:21 modules [1] - 242:7 mom [2] - 201:23, 205:20 moment [2] - 87:6, 162:8 monetarily [1] - 154:8 money [2] - 154:9, 218:9 monitor [1] - 122:20 month [2] - 18:3, 249:12 months [7] - 18:4, 75:21, 149:22, 182:6, 183:6, 190:25, 191:11 morning [9] - 3:2, 15:7, 15:8, 34:19, 34:20, 237:11, 238:11, 268:20, 269:24 most [11] - 47:12, 90:14, 96:11, 102:12, 112:22, 203:10, 228:2, 236:5, 240:18, 241:4, 244:5 mostly [1] - 221:23 mother [1] - 200:22 motion [6] - 6:25, 7:3, 151:1, 176:6, 241:7, 246:24 motions [1] - 7:11	motivation [2] - 11:3, 256:6 motivation al [1] - 91:21 mouth [1] - 74:21 move [13] - 64:4, 74:2, 143:23, 144:2, 145:11, 148:1, 148:23, 179:18, 179:25, 187:16, 187:18, 231:14 moved [2] - 145:9, 149:25 moving [10] - 13:24, 63:24, 64:2, 64:3, 83:15, 143:20, 143:24, 150:1, 233:18, 249:21 MR [80] - 8:17, 9:14, 11:1, 11:17, 12:9, 12:14, 12:19, 14:25, 15:6, 15:9, 15:14, 17:5, 19:11, 19:13, 22:5, 23:3, 23:6, 26:14, 31:4, 31:6, 31:21, 31:24, 32:22, 33:3, 34:13, 43:5, 43:8, 44:12,	71:4, 71:14, 73:11, 73:12, 74:7, 75:13, 76:24, 77:5, 94:4, 102:21, 102:23, 103:1, 105:21, 105:24, 118:13, 124:12, 124:25, 127:12, 128:3, 130:1, 130:16, 130:17, 130:18, 130:20, 131:1, 131:9, 143:7, 143:9, 151:5, 152:16, 157:3, 162:11, 165:5, 165:10, 206:3, 210:3, 210:6, 211:3, 217:19, 219:3, 219:11, 219:14, 219:16, 219:22, 221:18, 229:20, 229:25, 262:2, 265:7, 266:22, 267:23, 269:13 MS [58] - 3:9, 8:23, 9:12, 12:12, 14:9, 16:23, 22:1, 26:12, 30:23, 31:1, 34:16, 34:18,	43:9, 44:14, 71:2, 71:8, 73:8, 74:10, 74:17, 75:23, 76:1, 76:21, 93:9, 93:15, 105:19, 105:23, 117:23, 118:5, 124:16, 127:7, 127:15, 129:23, 131:4, 151:1, 152:19, 152:20, 157:5, 162:13, 165:8, 165:14, 165:16, 206:5, 206:7, 210:1, 210:4, 210:7, 211:6, 211:10, 212:9, 212:18, 217:18, 219:5, 261:21, 261:25, 263:21, 265:13, 268:22, 269:17 multiple [3] - 72:16, 72:23, 195:2 Mumin [2] - 129:16, 192:18 must [5] - 45:10, 87:4, 100:9, 205:14, 247:2 N N-A-T-A-L- I-N-I [1] -	78:4 NAACP [1] - 86:2 name [23] - 3:3, 15:10, 15:15, 19:5, 47:5, 47:13, 55:19, 58:16, 59:23, 69:24, 77:7, 87:4, 87:5, 98:3, 146:2, 157:23, 174:5, 185:10, 219:23, 258:24, 259:10 named [1] - 86:22 names [9] - 41:17, 47:12, 47:14, 64:6, 64:8, 64:20, 158:1, 160:10, 161:22 Narrative [3] - 140:9, 140:11, 141:6 narrative [2] - 96:23, 213:12 Natalini [11] - 78:4, 160:12, 160:18, 161:2, 163:8, 163:16, 164:24, 165:6, 165:9, 165:11, 165:12 Natalini's [1] - 162:1 national [2] - 27:16, 148:3 National [2] - 225:21, 253:3	nationwid e [1] - 236:17 nature [12] - 107:24, 128:1, 128:23, 134:23, 173:19, 197:24, 222:4, 232:19, 248:1, 251:10, 253:5, 257:23 necessaril y [6] - 47:25, 168:20, 198:12, 259:10, 259:14, 268:19 necessary [4] - 7:9, 7:12, 14:5, 151:19 need [11] - 6:2, 9:11, 102:14, 140:20, 176:17, 193:8, 203:13, 258:2, 259:16, 265:16, 267:6 needed [6] - 62:24, 93:5, 144:13, 167:24, 182:17, 224:5 needs [4] - 245:5, 245:11, 249:5, 259:21 negotiate [1] - 128:18 negotiated [4] - 144:15, 149:2, 149:3, 181:13 negotiatin g [1] - 189:25	negotiatio n [2] - 144:5, 190:17 negotiatio ns [6] - 144:14, 190:7, 190:9, 190:14, 190:18, 192:5 neighborh oods [5] - 79:15, 79:23, 80:3, 86:9, 113:4 never [21] - 85:4, 101:16, 114:16, 114:23, 114:25, 120:22, 122:5, 130:9, 142:20, 163:14, 163:19, 163:22, 171:3, 173:9, 186:11, 189:7, 201:17, 211:20, 245:20, 255:13, 263:22 New [1] - 225:3 new [6] - 29:3, 29:4, 40:10, 85:21, 237:9, 239:8 news [1] - 256:8 newspape rs [2] - 27:16, 27:20 next [18] - 56:19, 76:23, 87:17, 104:10, 112:20, 117:4, 119:11,
---	---	---	--	---	---	---	---	---

120:8, 122:23, 173:15, 216:21, 241:7, 255:4, 258:6, 260:18, 260:19, 264:12, 265:8 nice [2] - 248:15, 267:16 nine [3] - 18:4, 136:21, 255:5 nine-member [1] - 136:21 Non [3] - 213:22, 215:7, 215:10 non [7] - 17:12, 79:12, 80:8, 80:21, 85:15, 85:16, 86:1 Non-Academic [3] - 213:22, 215:7, 215:10 non-profit [7] - 17:12, 79:12, 80:8, 80:21, 85:15, 85:16, 86:1 none [3] - 11:17, 137:24, 211:3 North [6] - 143:24, 145:3, 145:7, 147:17, 147:24, 183:11 notarized [1] - 6:6 Notary [4] - 15:4, 77:3,	219:20, 271:13 note [4] - 5:22, 30:3, 32:22, 93:15 noted [4] - 26:18, 27:19, 93:17, 118:3 notes [4] - 68:11, 75:19, 212:10, 271:4 nothing [11] - 9:12, 129:4, 143:3, 152:16, 154:5, 154:7, 190:24, 191:10, 218:6, 219:5, 245:2 Nothing [1] - 74:7 notice [5] - 6:9, 6:10, 7:1, 232:3, 238:20 noticing [1] - 243:20 notificatio n [2] - 6:7, 118:21 notified [1] - 144:16 notify [1] - 155:10 notwithsta nding [1] - 226:23 November [10] - 29:18, 81:11, 82:6, 87:14, 226:22, 228:18, 228:20, 228:22, 229:1 nuances [1] - 168:5 number [34] - 13:9, 13:10,	31:18, 56:12, 56:17, 57:16, 60:1, 60:14, 62:11, 62:17, 62:20, 62:21, 62:23, 68:19, 68:20, 68:21, 73:7, 82:20, 84:22, 111:14, 111:24, 112:4, 123:24, 171:24, 172:1, 179:3, 180:14, 197:2, 199:3, 227:19, 251:3, 268:17 NUMBER [1] - 2:12 number's [1] - 25:10 numbered [2] - 116:22, 166:16 numbers [12] - 64:14, 70:22, 70:25, 99:13, 156:22, 180:24, 200:10, 201:12, 228:12, 244:10, 244:13 numeracy [1] - 18:25 numerous [5] - 86:2, 115:3, 115:4, 150:11 O o'clock [2] - 6:15, 270:2	O'Donnell [6] - 12:9, 125:7, 155:22, 156:5, 173:23, 192:11 O' DONNELL [1] - 1:17 O'Donnell' s [2] - 161:9, 161:12 oaths [1] - 7:8 object [2] - 16:24, 93:10 objected [3] - 114:8, 114:11, 211:20 objecting [2] - 211:23 objection [22] - 8:14, 16:23, 22:1, 26:12, 30:23, 31:2, 71:8, 73:8, 93:16, 114:16, 114:24, 114:25, 117:24, 127:7, 127:15, 129:23, 211:3, 261:21, 263:21, 265:13, 268:22 objections [2] - 8:21, 211:16 objective [3] - 97:14, 105:13, 214:21 Objective [1] - 97:16 objectives [5] - 128:14, 169:9, 169:14, 169:15,	214:20 Objectives [3] - 97:1, 214:1, 215:11 obligation [2] - 109:23, 167:11 observatio ns [1] - 263:16 observe [4] - 42:5, 108:19, 111:5, 177:11 observed [1] - 224:12 obviously [4] - 74:5, 104:22, 173:9, 262:15 occasions [3] - 101:23, 115:4, 122:3 occupanci es [1] - 150:5 occupied [1] - 149:11 occur [2] - 197:23, 241:8 occurred [1] - 151:13 October [10] - 92:24, 94:5, 94:21, 119:13, 174:2, 179:3, 179:12, 185:25, 226:17, 250:16 offense [1] - 237:20 offer [2] - 199:5, 199:8 offered [5] - 72:23, 115:21, 115:22, 259:21	offering [4] - 168:14, 169:5, 171:13, 259:24 office [3] - 78:16, 82:21 Officer [13] - 1:3, 2:6, 3:7, 6:5, 7:5, 7:7, 7:22, 8:3, 8:15, 9:1, 9:5, 54:25, 220:4 OFFICER [67] - 3:2, 3:13, 8:18, 8:24, 10:10, 11:15, 11:18, 12:11, 12:16, 14:7, 14:23, 17:1, 22:2, 23:1, 23:5, 26:13, 31:5, 31:12, 31:22, 34:15, 71:3, 71:10, 73:9, 74:8, 74:18, 75:11, 75:18, 75:25, 76:11, 76:16, 76:22, 93:12, 93:17, 118:3, 118:6, 124:8, 124:14, 124:18, 124:21, 127:10, 127:17, 127:22, 129:25, 131:6, 151:3, 152:18,	206:4, 211:8, 212:12, 212:16, 219:6, 219:9, 219:12, 221:10, 221:14, 221:17, 229:23, 261:22, 263:24, 265:14, 266:24, 268:23, 269:5, 269:11, 269:16, 269:19, 269:22 officers [1] - 108:10 officership [2] - 77:23, 78:6 Offices [1] - 6:17 official [6] - 52:1, 52:8, 52:13, 224:22, 226:13, 226:23 officially [4] - 38:9, 38:11, 219:16, 220:25 officials [2] - 83:24, 209:22 officio [4] - 136:19, 162:23, 162:24, 234:24 often [3] - 80:8, 100:13, 235:9 old [5] - 115:3, 172:2, 184:21, 193:18, 255:12 older [3] - 117:9, 120:17, 131:24 once [21] - 14:17,	17:17, 41:22, 62:2, 72:19, 132:25, 133:2, 144:15, 226:13, 226:17, 230:19, 235:10, 235:16, 235:18, 239:9, 241:4, 242:10, 243:13, 250:14, 260:9 Once [1] - 232:8 one [91] - 8:12, 11:9, 12:24, 13:12, 19:9, 22:13, 22:25, 40:11, 43:13, 44:2, 47:3, 59:9, 67:12, 75:23, 76:11, 76:20, 82:23, 84:1, 88:18, 95:10, 95:11, 100:19, 101:7, 108:17, 110:15, 113:19, 119:6, 122:12, 126:14, 130:19, 134:25, 137:6, 139:4, 139:20, 141:20, 141:23, 168:12, 172:22, 178:2, 181:11, 184:16, 187:21,	187:24, 192:11, 194:18, 195:2, 199:11, 200:16, 200:19, 201:9, 211:9, 217:20, 225:5, 231:15, 232:4, 232:21, 232:22, 237:9, 238:8, 238:19, 241:4, 241:25, 242:5, 248:25, 249:6, 249:18, 250:11, 251:7, 253:22, 255:3, 255:4, 255:13, 257:9, 258:12, 258:25, 259:20, 260:1, 260:19, 260:20, 262:22, 265:9, 265:20, 266:4, 266:6, 267:17, 267:25, 268:5 one-year [1] - 258:12 ones [13] - 45:6, 47:15, 66:10, 161:2, 184:17, 237:9, 244:5, 245:25, 248:6, 257:25, 258:19, 258:21, 264:13 ongoing [5] - 34:2,
---	---	--	---	--	---	---	---	--

92:11, 92:12, 190:3, 190:14 online [8] - 26:3, 27:1, 27:3, 27:6, 42:12, 58:7, 62:1, 75:5 open [6] - 19:7, 111:3, 161:17, 183:5, 200:7, 248:1 opening [8] - 14:10, 14:19, 14:20, 110:13, 182:13, 182:16, 182:18, 236:24 operate [5] - 131:20, 135:10, 147:16, 188:5, 188:19 operated [1] - 186:17 operates [1] - 79:14 operating [6] - 82:23, 186:16, 186:20, 187:13, 187:22, 187:25 operation [21] - 18:2, 23:13, 93:7, 97:12, 98:7, 98:15, 98:17, 98:19, 113:5, 117:15, 119:2, 119:5, 136:17, 140:19, 140:20, 145:17, 150:6,	181:3, 210:18, 213:5, 214:7 operations [4] - 99:7, 122:20, 136:1, 140:10 Operation s [1] - 164:11 operative [1] - 40:11 opportunit y [5] - 3:24, 4:11, 152:13, 211:5, 222:11 option [1] - 179:17 order [7] - 58:24, 62:24, 67:24, 113:7, 133:20, 147:8, 202:16 Organizati on [1] - 136:11 organizati on [5] - 81:5, 81:12, 85:15, 85:16, 86:19 organizati ons [10] - 17:12, 37:7, 79:12, 80:8, 80:21, 83:11, 86:1, 86:3, 138:18, 148:9 orientatio n [8] - 29:12, 202:6, 237:7, 237:11, 237:12, 247:1, 247:3, 248:16 origin [4] -	20:9, 20:21, 41:14, 50:24 original [17] - 16:21, 17:3, 20:23, 51:5, 84:6, 84:10, 86:21, 86:24, 87:2, 87:11, 87:15, 90:10, 138:4, 138:7, 152:7, 166:8, 182:25 originally [6] - 82:25, 84:7, 84:9, 106:5, 115:9, 228:13 otherwise [2] - 102:4, 110:25 ought [2] - 135:4, 255:6 ourselves [4] - 85:18, 90:16, 141:8, 181:15 outlined [3] - 120:21, 189:11, 189:21 overall [4] - 44:3, 66:14, 91:23, 242:13 overlooke d [1] - 33:1 overly [1] - 187:16 overruled [1] - 22:2 own [7] - 4:24, 41:12, 53:15, 129:6, 176:2, 248:22, 250:10	P p.m [3] - 6:15, 124:21, 270:2 P.S [2] - 119:15, 120:22 PA [8] - 1:14, 1:19, 6:18, 221:25, 248:12, 253:1, 253:2, 253:23 pacing [1] - 259:15 PAGE [2] - 2:3, 2:12 page [40] - 7:5, 19:17, 21:2, 21:9, 22:9, 22:12, 25:10, 27:23, 31:18, 47:16, 47:22, 53:19, 54:11, 54:18, 56:15, 56:19, 63:22, 64:3, 64:4, 64:14, 66:20, 68:16, 70:21, 111:9, 116:20, 117:4, 119:11, 120:8, 130:16, 136:8, 157:3, 160:8, 172:23, 213:21, 216:21, 233:13, 239:25, 260:22, 262:9, 265:8 Page [97] -	25:9, 25:14, 26:1, 27:9, 27:12, 27:22, 28:14, 28:18, 30:13, 30:14, 30:17, 30:25, 31:19, 31:23, 32:3, 32:14, 48:15, 49:5, 53:21, 54:4, 56:23, 57:15, 57:25, 59:1, 59:16, 60:7, 60:18, 60:19, 61:1, 61:3, 61:5, 61:7, 61:9, 61:17, 63:12, 66:21, 70:19, 73:14, 73:15, 90:23, 92:2, 94:10, 96:22, 96:23, 99:23, 99:25, 105:4, 105:22, 111:7, 111:8, 111:11, 121:18, 121:20, 121:24, 123:17, 125:12, 130:15, 130:17, 131:8, 131:14, 133:6, 136:4, 136:6, 136:9,	137:8, 137:9, 137:17, 143:5, 143:10, 159:18, 166:16, 169:25, 181:20, 188:25, 210:13, 213:17, 215:3, 215:13, 215:15, 215:23, 216:21, 218:14, 233:8, 233:12, 237:23, 239:21, 239:25, 241:14, 241:17, 241:20, 242:16, 247:16, 263:3, 263:4, 265:9 pages [5] - 19:14, 122:23, 130:18, 130:20, 243:14 Pages [5] - 30:17, 30:22, 32:1, 61:8, 97:4 paging [1] - 49:20 paid [3] - 18:19, 114:4, 165:4 paper [1] - 209:20 papers [1] - 68:4 Paragraph [40] - 94:22, 100:1, 100:5, 108:4, 108:12, 108:18, 108:22, 109:9, 110:11, 110:19,	112:3, 116:23, 116:24, 117:5, 123:17, 131:18, 133:6, 135:12, 166:16, 174:10, 176:4, 176:19, 177:2, 177:10, 177:18, 180:7, 180:15, 189:4, 206:8, 207:13, 208:4, 208:18, 252:17, 252:18, 257:15, 257:20, 260:22, 262:3, 267:9 paragraph [29] - 66:3, 94:24, 95:3, 109:15, 109:23, 110:5, 116:25, 120:6, 120:7, 121:9, 121:19, 124:3, 125:15, 125:18, 133:8, 133:9, 136:14, 137:9, 166:16, 166:19, 208:5, 208:7, 208:12, 208:14, 218:19, 261:1, 263:8, 265:8 Paragraph s [2] - 210:5, 252:13 paragraph s [3] -	33:6, 116:23, 133:9 parameter s [1] - 120:18 paraphrasi ng [1] - 116:16 pardon [1] - 264:23 parent [4] - 200:15, 203:1, 236:25 parents [14] - 83:22, 86:1, 112:10, 113:1, 113:8, 113:14, 116:7, 136:23, 202:3, 203:17, 205:21, 226:24, 247:3, 247:10 Park [1] - 1:13 Parochial [1] - 221:15 part [55] - 10:21, 11:3, 17:19, 19:4, 20:1, 20:22, 29:12, 39:16, 55:4, 56:20, 73:1, 81:16, 103:14, 108:21, 116:9, 119:4, 122:15, 127:5, 135:6, 142:2, 165:10, 168:9, 168:10, 171:12, 171:14, 177:13, 197:16, 198:3,	198:5, 200:12, 200:20, 200:21, 201:25, 202:8, 202:9, 202:13, 207:20, 215:21, 221:8, 227:5, 233:13, 233:20, 234:15, 238:4, 238:9, 239:23, 239:24, 245:14, 246:23, 247:1, 249:9, 254:9, 254:12, 254:13, 268:24 part-time [1] - 221:8 participant [1] - 16:16 participate [9] - 27:7, 72:8, 127:18, 130:2, 130:5, 130:7, 150:8, 214:19, 243:16 participate d [11] - 16:7, 40:7, 72:3, 72:4, 72:5, 88:7, 129:11, 177:25, 185:15, 188:16, 240:5 participati ng [2] - 18:16, 153:9 participati on [3] - 240:4, 251:22, 255:9 particular
--	--	--	--	--	--	---	--	--

[25] - 42:1, 42:4, 47:17, 48:9, 57:18, 59:10, 59:19, 64:10, 73:21, 114:12, 120:20, 127:5, 127:19, 211:17, 211:24, 216:6, 221:23, 225:6, 227:18, 231:6, 234:23, 251:4, 251:18, 264:5, 264:9	242:7 passed [2] - 179:13, 243:24 passing [3] - 28:13, 28:23, 28:24 past [8] - 31:9, 78:20, 81:11, 121:25, 122:2, 163:12, 212:3, 267:10 patently [1] - 255:23 Paul [3] - 1:13, 11:19, 12:14 pause [1] - 143:7	40:23, 41:1, 78:9, 78:12, 79:16, 81:9, 82:12, 100:10, 110:23, 117:2, 164:4, 165:24, 166:2, 209:2, 220:22, 220:24, 225:2, 226:14, 226:15, 252:19, 253:21, 258:18, 258:19, 268:16, 271:13	- 26:9, 26:18, 28:7, 28:8, 28:9, 28:11, 28:12, 28:20, 28:21, 28:22, 54:10, 54:13, 54:21, 56:10, 63:18, 64:11, 65:2, 73:18, 97:12, 98:7, 99:9, 126:22, 126:23, 126:25, 133:17, 133:21, 134:1, 138:20, 194:24, 198:9, 214:6, 214:7, 214:8, 216:4, 216:14, 216:15, 217:1, 228:5, 228:7, 228:10, 253:20, 254:1, 254:3, 254:6, 256:4, 263:14, 264:10, 264:16, 264:18, 264:19, 264:24, 265:1, 268:14	257:6, 263:12 percentile [3] - 65:6, 65:8, 65:10 percentile s [1] - 65:13 perform [3] - 163:16, 164:25, 204:4 performan ce [35] - 33:12, 99:9, 100:4, 101:5, 102:1, 102:16, 104:5, 105:12, 116:11, 122:20, 126:1, 126:3, 127:2, 133:3, 134:3, 134:13, 134:22, 135:11, 140:24, 141:1, 194:6, 209:8, 209:13, 209:14, 209:25, 228:2, 230:4, 234:3, 235:23, 250:4, 253:10, 253:11, 255:9, 265:4	18:25, 28:19, 33:14, 40:5, 57:21, 135:24, 163:19, 264:13 performer s [1] - 203:10 performin g [6] - 40:3, 45:18, 102:12, 106:7, 112:11, 112:21 perhaps [5] - 62:2, 106:9, 142:19, 193:19, 194:7 period [22] - 18:1, 18:3, 38:6, 59:14, 62:8, 82:18, 102:2, 114:19, 114:22, 114:23, 115:11, 119:16, 178:15, 185:13, 190:10, 190:21, 190:25, 191:7, 191:8, 192:16, 205:14, 238:10	[1] - 188:11 persist [1] - 92:1 person [7] - 44:7, 48:24, 104:4, 162:21, 222:23, 234:23, 235:3 personal [2] - 83:8, 217:11 personally [3] - 196:1, 198:20, 211:25 perspectiv e [6] - 27:13, 78:22, 115:22, 155:15, 201:14, 209:19 perspectiv es [2] - 115:21, 115:22 pertaining [2] - 137:23, 146:1 Petersen [16] - 1:12, 2:4, 2:5, 2:6, 2:8, 4:9, 8:4, 8:19, 12:12, 120:5, 123:11, 125:7, 128:5, 158:5, 192:10, 211:4 PETERSE N [58] - 3:9, 8:23, 9:12, 12:12, 14:9, 16:23, 22:1, 26:12, 30:23, 31:1, 34:16, 34:18, 43:9, 44:14,	71:2, 71:8, 73:8, 74:10, 74:17, 75:23, 76:1, 76:21, 93:9, 93:15, 105:19, 105:23, 117:23, 118:5, 124:16, 127:7, 127:15, 129:23, 131:4, 151:1, 152:19, 152:20, 157:5, 162:13, 165:8, 165:14, 165:16, 206:5, 206:7, 210:1, 210:4, 210:7, 211:6, 211:10, 212:9, 212:18, 217:18, 219:5, 261:21, 261:25, 263:21, 265:13, 268:22, 269:17 phase [5] - 4:8, 10:9, 10:18, 106:17, 113:9 phases [1] - 9:17 Philadelph ia [4] - 1:19, 17:12, 78:15, 227:19 philanthro pic [3] - 81:16, 85:20, 138:14 Philip [1] - 160:12	philosoph y [2] - 236:2, 259:13 phones [1] - 5:13 physical [1] - 25:2 physically [2] - 25:6, 109:2 pick [1] - 224:24 picking [2] - 3:11, 243:5 picture [2] - 93:13, 248:9 pie [3] - 26:8, 26:16, 28:6 piece [6] - 10:15, 26:8, 44:2, 156:2, 168:5, 225:4 pieces [5] - 26:16, 35:19, 35:25, 44:18 Pierre [1] - 150:16 PIMS [3] - 226:14, 229:15, 230:18 pitched [1] - 129:6 place [22] - 8:13, 18:18, 35:19, 87:21, 150:4, 150:21, 180:4, 208:1, 233:16, 233:20, 233:22, 233:23, 236:9, 245:21, 246:8, 247:12, 249:4, 250:14, 259:17, 260:14,
--	---	---	--	---	--	--	--	--

267:15, 268:8 placed [5] - 20:10, 181:17, 224:16, 245:18, 245:21 placement [11] - 199:9, 245:22, 247:1, 247:7, 247:8, 247:21, 248:21, 249:13, 249:14, 250:20, 260:3 placement s [1] - 250:17 placing [1] - 246:7 plan [4] - 23:18, 142:2, 167:7, 167:22 planning [6] - 83:21, 91:6, 117:7, 214:18, 214:23, 260:18 players [1] - 17:23 plus [2] - 110:24, 247:8 Poconos [1] - 227:18 point [47] - 6:4, 11:12, 12:5, 12:17, 22:9, 28:7, 36:20, 38:15, 38:23, 53:11, 53:19, 58:12, 58:21, 64:11, 66:8, 67:2, 67:4,	67:12, 84:17, 97:18, 114:7, 124:10, 132:13, 154:13, 154:21, 155:4, 158:15, 172:6, 172:17, 179:17, 183:6, 183:9, 184:2, 184:9, 190:2, 191:17, 205:5, 214:4, 214:13, 215:11, 222:20, 228:11, 243:23, 247:17, 251:11, 256:2, 258:11 pointed [6] - 109:5, 161:12, 174:10, 180:6, 207:12, 266:3 pointing [2] - 8:20, 266:13 points [3] - 13:16, 31:15, 128:25 poking [1] - 172:4 policies [1] - 207:10 policy [4] - 16:9, 40:5, 205:19, 209:18 pontificate [1] - 208:23 pool [4] - 32:18, 61:9, 61:10, 227:14 poor [1] - 194:6 populated	[1] - 22:16 population [30] - 85:3, 96:11, 100:12, 101:20, 106:7, 112:6, 128:2, 192:25, 194:25, 195:5, 195:14, 195:15, 195:18, 196:2, 196:6, 198:4, 203:21, 205:11, 205:13, 209:9, 223:1, 224:15, 225:15, 256:5, 256:10, 256:23, 257:2, 257:4, 261:19 portion [2] - 19:2, 212:23 portions [1] - 56:3 position [19] - 9:18, 9:19, 14:16, 14:19, 16:1, 36:23, 45:16, 77:9, 79:4, 132:12, 205:21, 220:1, 220:5, 220:7, 220:8, 221:7, 221:8, 223:11, 223:14 positions [2] - 17:11, 77:16 positive [1] - 24:21 possibility [3] - 167:10,	168:13, 205:14 possible [13] - 72:8, 73:2, 167:16, 168:18, 168:21, 171:7, 179:21, 205:21, 227:16, 232:11, 232:13, 238:23, 247:6 possibly [2] - 49:14, 81:23 post [1] - 262:19 potential [2] - 100:14, 144:6 potentially [1] - 167:2 poverty [2] - 197:21, 223:7 practice [2] - 78:18, 142:2 practiced [2] - 78:13, 78:17 practices [1] - 236:17 pre [4] - 238:25, 258:4, 259:9, 262:19 pre- Algebra [1] - 259:9 pre- Algebraic [1] - 258:4 precedenc e [1] - 11:4 predated [1] - 49:3 predicted [1] - 227:9 prediction [1] - 227:7 prefer [1] - 232:16 preference [3] - 109:11,	112:2, 176:21 pregnancy [1] - 106:21 pregnant [2] - 194:14, 197:9 preliminar y [3] - 12:4, 245:12, 258:4 premarked [1] - 8:2 preparatio n [6] - 30:2, 44:11, 53:24, 223:18, 231:22, 234:21 Preparatio n [1] - 135:13 prepare [6] - 7:14, 53:2, 56:3, 135:15, 212:23, 241:18 prepared [16] - 40:5, 70:8, 70:12, 104:13, 140:17, 155:16, 155:19, 157:12, 178:11, 178:13, 178:14, 178:16, 178:25, 219:1, 243:19, 244:3 prepares [1] - 34:12 preparing [6] - 25:1, 35:14, 44:23, 44:24, 51:25, 178:15 present [11] - 4:9, 4:12, 13:9,	14:16, 74:4, 106:19, 141:6, 163:5, 163:6, 202:5, 240:24 presentati on [3] - 4:5, 11:23, 64:19 presented [27] - 20:21, 32:20, 43:22, 43:23, 48:12, 51:7, 52:4, 52:11, 52:13, 55:4, 58:9, 63:6, 66:18, 71:20, 95:12, 96:9, 96:10, 131:12, 143:1, 146:24, 167:18, 167:20, 170:19, 192:14, 192:17, 192:21, 206:21 presenting [4] - 3:21, 10:12, 74:3, 106:10 presents [1] - 32:14 preserve [1] - 8:14 preserved [1] - 8:19 President [5] - 78:21, 79:5, 164:10, 164:18, 175:4 presiding [1] - 7:7 press [1] - 17:21 pretty [7] -	82:4, 93:24, 110:25, 112:14, 149:18, 223:6, 236:5 previous [6] - 49:1, 52:17, 66:20, 232:21, 232:22, 260:7 previously [7] - 7:24, 8:19, 44:23, 173:25, 174:10, 180:6, 186:22 primarily [9] - 37:21, 84:12, 96:12, 221:22, 223:3, 223:16, 232:18, 233:23, 242:2 primary [2] - 88:17, 93:3 Principal [11] - 42:19, 42:22, 42:24, 220:3, 232:1, 232:5, 232:8, 235:5, 251:12, 263:17 printout [1] - 19:18 printouts [1] - 19:22 prints [1] - 251:1 prioritize [2] - 110:1, 205:18 priority [2] - 110:3, 233:24 privacy [2] - 70:1, 226:3 private [1] - 221:16	privately [1] - 92:22 pro [4] - 77:11, 78:8, 153:3, 154:3 probability [4] - 228:1, 228:3, 228:7, 228:14 probative [2] - 209:11, 209:15 problem [19] - 5:21, 11:15, 31:18, 84:19, 91:11, 91:14, 93:7, 93:19, 115:23, 116:12, 165:18, 196:22, 224:18, 224:20, 227:13, 248:3, 248:11, 268:4, 269:19 problems [7] - 106:21, 107:16, 108:2, 112:17, 197:22, 197:24, 203:16 procedura I [3] - 7:11, 8:9, 9:10 procedure [1] - 268:1 procedure s [1] - 12:5 proceed [5] - 9:6, 11:23, 12:18, 76:18, 91:6 proceeded [1] - 92:23 proceedin g [3] - 4:4, 7:22, 128:10	proceedin gs [18] - 4:14, 4:18, 4:20, 5:14, 7:2, 7:7, 9:2, 9:8, 14:21, 52:5, 120:14, 122:12, 150:3, 179:23, 187:20, 270:1, 271:3, 271:6 process [52] - 7:17, 16:18, 17:24, 17:25, 18:5, 29:12, 58:17, 59:7, 84:3, 89:3, 89:20, 89:23, 100:4, 102:7, 111:5, 113:12, 114:3, 116:7, 128:25, 151:18, 175:19, 179:25, 188:11, 189:25, 200:12, 200:20, 200:21, 201:1, 201:9, 201:24, 202:1, 202:3, 202:5, 202:8, 205:20, 214:18, 214:23, 214:24, 232:2, 236:9, 237:7, 241:3, 241:9, 242:20, 243:4,
---	--	---	--	--	--	--	--	--

245:10, 247:1, 247:6, 249:9, 254:7 processes [1] - 188:12 processin g [1] - 153:11 produce [1] - 62:10 produced [1] - 142:8 productio n [1] - 57:7 productive ly [1] - 104:13 profession al [3] - 17:10, 237:14, 258:14 Proficient [2] - 126:6, 133:16 proficient [15] - 98:8, 99:10, 228:5, 230:6, 253:21, 253:24, 263:13, 264:11, 264:16, 264:19, 264:24, 268:14, 268:17, 269:6 Profile [2] - 25:11, 25:18 profile [1] - 73:4 Profiles [2] - 223:4, 254:8 profiles [2] - 253:10, 253:11 profit [7] - 17:12, 79:12, 80:8, 80:21, 85:15, 85:16, 86:1 program	[31] - 16:6, 26:4, 27:3, 27:4, 40:8, 40:9, 40:10, 40:12, 44:17, 79:13, 79:19, 79:20, 79:25, 80:1, 80:2, 80:4, 80:18, 82:24, 86:5, 86:6, 86:8, 86:12, 86:20, 169:5, 211:13, 222:17, 223:17, 236:17, 249:19 Program [3] - 81:3, 81:4, 238:2 programm ing [3] - 80:9, 199:6, 199:9 programs [9] - 79:13, 79:18, 80:6, 80:23, 82:20, 83:12, 221:24, 243:8 Programs [1] - 164:19 Progress [1] - 255:2 progress [2] - 223:23, 256:4 progressi ng [1] - 194:7 prohibit [1] - 187:13 project [1] - 227:25 projected	[1] - 169:8 projection [7] - 228:3, 229:4, 230:5, 230:24, 231:7, 231:8, 258:3 projection s [6] - 167:19, 169:7, 169:13, 228:23, 229:3, 229:8 projects [1] - 16:8 prominent [1] - 81:3 promote [1] - 86:20 promptly [1] - 124:22 pronounc ements [1] - 209:2 proof [1] - 5:25 Proof [2] - 2:13, 6:5 proper [1] - 268:1 property [22] - 143:18, 143:21, 144:8, 144:25, 145:5, 145:8, 145:21, 145:22, 145:23, 146:10, 146:16, 148:16, 149:6, 149:9, 149:20, 149:23, 150:1, 150:2, 150:5, 150:10, 151:22, 152:3 proposal [11] - 16:8, 123:5, 127:1, 127:5,	132:8, 132:10, 133:24, 134:4, 172:3, 191:10 proposals [3] - 40:5, 129:15, 134:21 propose [1] - 181:14 proposed [27] - 4:6, 7:14, 7:15, 8:9, 9:7, 84:7, 86:21, 117:6, 123:24, 124:1, 125:9, 131:2, 131:14, 132:16, 132:17, 133:6, 134:3, 157:14, 157:16, 182:21, 192:18, 208:2, 263:4, 265:9, 266:8, 267:2, 267:3 Proposed [1] - 130:22 proposing [2] - 84:2, 117:22 propriety [1] - 11:14 prosecutin g [1] - 9:19 prospectiv ely [1] - 13:24 proud [1] - 245:2 proved [1] - 245:11 provide [19] - 32:25, 34:10, 43:25, 47:13, 58:24, 59:12, 83:19, 107:3,	108:7, 109:10, 110:5, 133:19, 140:15, 165:2, 176:20, 181:2, 221:20, 243:14, 253:10 provided [15] - 6:23, 22:10, 34:6, 54:25, 56:7, 67:25, 68:4, 73:13, 95:22, 136:2, 142:22, 179:6, 192:22, 207:23, 238:17 provides [2] - 42:5, 231:7 providing [5] - 80:21, 83:6, 138:14, 140:15, 153:12 provision [7] - 132:7, 132:10, 151:20, 176:9, 181:5, 206:13, 206:15 provisions [5] - 103:11, 108:20, 119:15, 123:25, 177:12 proximity [1] - 183:9 PSSA [23] - 98:10, 170:3, 170:7, 225:9, 225:11, 225:23, 225:25, 226:2, 226:4,	226:7, 227:14, 227:20, 230:4, 231:6, 239:2, 251:4, 253:5, 253:6, 253:22, 254:7, 264:21, 268:8 PSSA's [5] - 209:3, 209:7, 230:11, 231:11, 267:15 psycholog ical [1] - 100:16 Public [4] - 15:4, 77:3, 219:20, 271:13 public [19] - 5:5, 5:6, 5:7, 6:7, 6:10, 6:18, 23:14, 24:11, 68:8, 79:1, 92:20, 94:3, 148:7, 148:16, 203:20, 208:22, 209:22, 221:22, 223:2 Publicatio n [2] - 2:13, 6:5 publicly [5] - 84:19, 150:13, 161:20, 223:5, 261:7 published [3] - 125:24, 133:13, 170:3 publishes [1] - 161:22 pull [1] - 140:18	pulled [2] - 73:20, 259:1 pulling [1] - 142:6 punch [1] - 200:5 purcellc@ readingschool .org [1] - 139:14 purely [3] - 21:1, 44:20, 64:5 purporting [1] - 24:6 purpose [6] - 3:13, 7:4, 35:6, 72:22, 207:5, 233:1 purposes [3] - 7:22, 9:1, 132:1 pursuant [2] - 117:2, 119:15 pursue [4] - 144:13, 183:18, 201:15, 246:21 push [1] - 3:10 pushed [2] - 93:24, 238:22 put [19] - 6:3, 9:22, 11:2, 21:4, 21:6, 21:13, 21:18, 21:21, 27:13, 74:21, 138:21, 141:7, 181:5, 188:18, 217:9, 236:8, 246:23, 247:4, 251:2 putting [2] - 49:25, 247:6 PVAAS [25] - 220:25, 222:5,	222:15, 223:3, 226:5, 226:13, 226:18, 227:3, 227:4, 227:21, 227:22, 227:24, 228:13, 229:16, 230:19, 230:23, 231:3, 231:7, 255:12, 255:20, 255:21, 259:5, 265:10 Q qualificati on [2] - 188:12, 243:7 qualifying [1] - 245:10 quality [5] - 30:15, 44:18, 79:8, 183:11, 209:11 quarter [2] - 28:10, 28:11 queried [1] - 177:24 questionin g [2] - 146:14, 146:16 questions [31] - 16:25, 31:16, 34:14, 42:1, 42:3, 45:1, 68:8, 74:8, 74:20, 75:12, 76:12, 114:14, 114:15, 115:1, 115:13, 115:20,	142:25, 152:2, 165:13, 166:4, 183:10, 184:12, 184:14, 184:17, 185:20, 188:6, 188:11, 229:21, 251:10, 252:16, 269:15 quibble [1] - 176:17 quite [1] - 167:13 quote [18] - 10:18, 35:6, 56:24, 56:25, 159:11, 159:13, 159:22, 166:20, 166:22, 170:2, 176:6, 176:19, 176:23, 177:11, 214:5, 214:9, 218:20, 252:19 quoted [1] - 215:10 R raise [2] - 132:22, 187:21 raised [25] - 9:24, 90:8, 93:1, 93:3, 109:5, 114:14, 114:15, 114:16, 115:1, 144:19, 144:21, 145:23, 146:9, 146:11, 146:12, 147:3, 152:3,
---	--	---	---	--	--	--	--	--

183:10, 184:12, 184:14, 184:20, 184:22, 184:24, 185:3, 211:17 raising [1] - 185:17 ran [1] - 110:2 range [1] - 174:14 rate [6] - 214:5, 215:24, 216:3, 216:6, 216:22, 217:1 rates [2] - 104:21, 126:7 rather [11] - 13:23, 26:3, 52:22, 89:6, 90:18, 91:7, 117:8, 128:6, 133:21, 168:21, 256:9 rational [4] - 101:24, 105:12, 129:19, 134:22 rationale [1] - 206:25 RE [1] - 1:1 reach [5] - 4:8, 87:7, 106:8, 112:23, 122:13 reached [3] - 8:6, 129:21, 129:22 reaction [5] - 92:17, 96:3, 121:8, 122:7, 127:16 reactions [1] - 240:24 read [35] -	26:19, 26:20, 27:11, 27:16, 54:14, 94:22, 97:10, 97:14, 100:1, 100:5, 105:13, 108:6, 108:12, 108:17, 109:9, 116:22, 116:24, 119:11, 120:8, 121:18, 123:19, 125:18, 126:11, 131:18, 133:7, 135:13, 136:13, 160:10, 166:12, 166:15, 168:19, 169:1, 169:6, 209:20, 213:11 reader [3] - 64:16, 66:12, 66:17 Readiness [6] - 246:18, 246:19, 246:20, 257:24, 260:11, 262:5 readiness [9] - 223:23, 246:18, 249:20, 256:17, 258:1, 260:10, 260:15, 260:21, 262:20 Reading [84] - 1:7, 1:9, 1:15, 3:6, 3:8, 3:18, 6:6, 6:8, 6:9,	6:18, 13:18, 16:14, 17:15, 24:24, 42:20, 55:9, 67:16, 67:19, 71:5, 71:6, 72:4, 73:21, 82:2, 82:12, 82:16, 82:17, 82:21, 82:23, 82:24, 83:17, 83:23, 86:12, 86:20, 86:24, 87:2, 88:23, 90:18, 91:7, 91:13, 97:25, 98:9, 107:22, 117:8, 118:1, 118:24, 119:14, 126:4, 136:15, 136:25, 140:4, 143:19, 146:8, 148:4, 148:10, 149:10, 149:14, 150:22, 150:24, 159:7, 170:3, 171:3, 174:6, 175:4, 175:7, 179:7, 189:15, 195:24, 196:3, 196:14, 196:18, 196:21, 196:24, 197:3,	197:8, 200:24, 203:17, 206:10, 218:21, 224:20, 227:18, 230:1, 230:10, 233:5, 261:11 reading [26] - 25:22, 26:5, 26:6, 26:10, 27:5, 27:7, 27:15, 27:21, 28:4, 53:15, 55:10, 55:11, 61:24, 72:22, 73:4, 73:22, 74:3, 74:4, 74:5, 97:19, 105:20, 108:17, 166:17, 169:24, 196:4, 207:13 reads [1] - 234:13 ready [4] - 224:17, 239:6, 244:8, 246:21 Real [1] - 148:4 real [9] - 29:16, 29:17, 34:6, 58:24, 144:13, 222:25, 223:18, 225:14, 251:7 reality [1] - 265:25 really [46] - 33:20, 72:6, 82:3, 90:13,	91:4, 101:20, 102:5, 102:7, 102:14, 103:22, 104:17, 134:14, 134:16, 179:16, 195:13, 222:16, 223:7, 224:14, 224:16, 225:7, 225:15, 225:21, 227:10, 227:12, 227:14, 230:16, 231:4, 231:11, 233:18, 235:1, 238:21, 241:11, 242:19, 243:1, 243:4, 243:12, 245:16, 246:12, 249:2, 251:13, 251:16, 254:23, 255:6, 255:11, 259:12, 269:7 realm [1] - 129:10 reason [6] - 6:16, 69:19, 76:12, 105:9, 183:17, 264:2 reasonabl e [2] - 5:1, 102:15 reasons [7] - 12:23, 14:6, 88:12, 101:7, 134:9, 134:25, 253:23 recalling [2] - 92:18,	156:4 recap [3] - 171:19, 249:23, 256:22 recapture [1] - 171:15 receipt [1] - 3:23 receive [3] - 7:9, 20:14, 142:17 received [9] - 41:10, 48:6, 81:6, 127:14, 217:25, 218:3, 218:5, 222:13, 268:20 receiving [6] - 121:5, 142:13, 148:16, 149:19, 154:4, 217:14 recent [1] - 53:1 recently [1] - 52:22 recess [5] - 76:15, 124:14, 124:20, 212:15, 269:23 Recogniti on [1] - 248:14 recognitio n [1] - 142:20 recognize [6] - 13:25, 19:15, 23:7, 94:15, 139:11, 231:20 recognize d [2] - 80:22, 80:23 recognize s [4] - 100:6, 117:11, 166:20, 208:6	recognizin g [1] - 262:20 recollectio n [18] - 10:24, 11:19, 22:19, 71:11, 87:13, 87:22, 125:4, 144:22, 145:13, 149:3, 156:8, 176:14, 178:3, 183:8, 184:25, 185:16, 190:22 recommen dations [1] - 244:7 reconvene [1] - 124:23 reconveni ng [1] - 76:17 record [44] - 3:12, 4:20, 6:4, 7:14, 8:10, 8:14, 9:16, 10:21, 11:3, 12:7, 15:10, 15:12, 15:16, 19:11, 48:2, 76:17, 77:7, 92:20, 93:16, 105:14, 124:16, 124:17, 124:18, 131:4, 131:5, 131:7, 143:8, 160:10, 166:13, 166:15, 207:14, 212:12, 212:14,	212:17, 219:13, 219:15, 219:24, 254:24, 265:24, 266:23, 266:25, 269:24, 269:25 Record [1] - 31:9 recording [1] - 20:22 records [5] - 53:22, 214:9, 247:8, 257:7, 257:8 recovery [3] - 167:17, 168:5, 171:19 recruit [11] - 90:16, 91:5, 102:12, 109:17, 109:18, 112:6, 116:15, 117:7, 117:8, 203:9 recruiters [1] - 112:9 recruiting [1] - 201:7 recruitme nt [1] - 18:5 recruits [1] - 217:21 redesign [3] - 101:15, 103:15, 103:23 redirect [2] - 71:3, 74:9 reduced [1] - 189:12 reengage [1] - 91:15 refer [8] - 16:20, 22:25, 29:22, 97:24, 99:16, 126:10,	165:9, 232:22 reference [1] - 159:15 referenced [16] - 30:4, 34:21, 44:6, 56:20, 65:20, 66:23, 112:2, 113:19, 139:20, 174:9, 177:17, 178:2, 193:4, 198:24, 207:17, 210:12 references [2] - 57:5, 100:19 referencin g [4] - 108:23, 158:12, 173:3, 252:13 referring [13] - 16:21, 18:1, 23:2, 29:1, 31:19, 38:17, 38:18, 55:13, 89:19, 111:10, 137:10, 178:10, 254:13 refined [1] - 257:22 refinement [1] - 253:3 reflect [13] - 19:12, 59:2, 61:7, 61:9, 61:10, 94:25, 100:9, 156:1, 172:19, 174:11, 183:19, 192:15, 241:6
--	--	--	---	---	--	---	---	--

reflected [18] - 34:23, 47:18, 50:18, 53:8, 55:7, 58:13, 59:21, 59:24, 60:17, 60:18, 61:14, 64:1, 69:23, 74:23, 108:4, 161:18, 161:20, 180:10	166:5, 182:21, 191:13, 211:16, 212:3, 217:24, 240:14, 252:17, 254:17 regards [5] - 3:22, 3:25, 5:4, 8:25, 10:22 registered [1] - 226:9 regular [2] - 136:20, 196:11 regulation s [6] - 108:16, 125:24, 133:13, 145:24, 146:6, 266:2 regulatory [1] - 150:3 reimburse d [1] - 218:7 reinforce ment [1] - 238:14 related [10] - 17:22, 18:17, 35:8, 36:6, 54:21, 83:14, 115:7, 115:8, 187:5, 250:23 relating [1] - 115:8 relationships p [5] - 135:17, 135:22, 137:20, 138:10, 226:11 relative [4] - 14:21, 41:9, 177:7, 180:9 relevance [2] - 209:6, 264:13 relevancy	[2] - 73:8, 263:21 reliability [1] - 249:1 reliable [1] - 249:17 relied [2] - 43:25, 173:14 relieve [1] - 256:8 reluctantly [1] - 123:9 rely [5] - 10:17, 10:21, 217:15, 225:7, 240:18 relying [1] - 173:13 remain [2] - 153:15, 161:2 remainder [4] - 27:22, 29:25, 30:2, 99:3 remained [4] - 59:17, 60:12, 61:1, 91:20 remaining [1] - 136:24 remains [1] - 132:7 remarks [1] - 12:4 remediatio n [1] - 242:10 remember [29] - 25:1, 30:1, 69:19, 71:12, 85:13, 87:4, 87:5, 87:6, 87:11, 88:4, 88:14, 111:22, 113:20, 121:5, 121:8, 146:2, 173:7, 184:15, 184:16, 185:3,	185:5, 185:6, 185:11, 204:20, 204:21, 213:10, 249:12, 256:7 renew [1] - 117:23 renewal [12] - 100:4, 114:23, 122:15, 122:18, 122:21, 143:2, 151:13, 151:18, 185:25, 186:6, 186:13, 186:18 Renewal [6] - 126:1, 126:9, 131:21, 131:23, 133:17, 263:15 renewed [6] - 119:22, 121:3, 151:15, 185:25, 186:5, 186:16 renews [1] - 119:15 repeat [2] - 205:8, 211:9 repeated [1] - 193:24 repeating [1] - 176:10 rephrase [3] - 73:9, 127:10, 178:23 replicated [1] - 224:9 replied [1] - 35:12 Report [30] - 23:11, 24:6, 51:15, 51:17, 51:21, 52:1,	52:8, 52:13, 70:8, 70:10, 139:19, 139:25, 140:9, 140:11, 140:21, 141:2, 141:3, 141:7, 142:15, 212:20, 215:13, 215:15, 215:22, 216:5, 216:22, 233:5, 233:7, 240:23 report [57] - 24:5, 24:10, 25:2, 30:2, 31:20, 32:2, 33:5, 42:4, 43:24, 44:6, 44:11, 44:17, 44:23, 52:11, 53:12, 54:24, 55:10, 59:8, 59:11, 64:21, 68:1, 68:7, 68:10, 70:12, 71:7, 71:16, 71:21, 139:21, 140:16, 140:17, 141:4, 142:3, 142:8, 145:2, 146:23, 147:9, 147:11, 147:13, 212:25, 217:12, 226:7,	226:8, 226:18, 226:23, 231:3, 231:5, 231:7, 233:13, 234:5, 239:15, 239:24, 240:7, 247:10, 247:13, 251:11, 255:20, 255:21 Report2. doc [1] - 139:25 reported [4] - 33:5, 228:25, 229:11, 251:17 Reporter [3] - 15:4, 77:3, 219:20 REPORTER R [1] - 15:12 Reporter- Notary [3] - 15:4, 77:3, 219:20 reporting [3] - 18:19, 227:22, 251:18 REPORTI NG [2] - 1:23, 271:15 Reports [5] - 139:1, 139:5, 213:7, 213:10, 213:15 reports [15] - 30:5, 42:13, 42:14, 44:20, 58:8, 100:19, 140:7, 141:20, 142:10, 142:15, 142:18, 143:1, 196:5,	213:12, 230:24 represent [4] - 12:20, 59:6, 123:11, 128:5 representa tion [2] - 94:19, 161:9 representa tions [6] - 33:7, 120:13, 120:16, 120:24, 155:17, 209:1 representa tive [2] - 66:24, 98:8 representa tives [2] - 115:4, 129:18 represente d [15] - 21:10, 35:7, 47:22, 50:20, 56:15, 57:8, 57:10, 57:14, 61:11, 66:6, 68:18, 70:22, 70:25, 73:5, 158:2 representi ng [4] - 1:15, 1:20, 242:17, 242:18 represents [2] - 27:24, 59:19 reputation [1] - 128:12 request [22] - 3:22, 7:22, 7:25, 10:4, 10:19, 12:21, 12:24,	14:12, 32:24, 133:2, 138:6, 138:19, 155:14, 156:10, 181:1, 191:18, 191:24, 192:3, 192:4, 193:5, 206:1, 252:6 Request [1] - 99:18 requested [11] - 127:25, 158:8, 158:9, 158:11, 159:12, 181:15, 192:23, 192:24, 257:20 requesting [4] - 126:22, 126:25, 152:13, 254:16 requests [6] - 6:12, 138:15, 155:25, 156:11, 157:11, 214:19 required [20] - 5:20, 24:13, 51:18, 84:13, 90:4, 90:20, 91:10, 111:15, 125:21, 132:13, 140:16, 140:22, 144:14, 173:14, 175:22, 181:17, 230:21, 242:8, 245:18, 245:20 requireme nt [1] -	201:6 requireme nts [9] - 4:17, 30:15, 102:9, 108:15, 110:20, 125:22, 131:22, 133:12, 174:9 requiring [1] - 110:12 research [3] - 16:9, 27:19, 91:12 researche d [1] - 40:6 reserve [2] - 14:10, 14:20 reserves [1] - 176:6 reserving [3] - 4:1, 10:16, 14:8 resetting [3] - 100:11, 209:17, 252:20 residents [3] - 82:23, 83:5, 136:24 resign [4] - 154:24, 155:4, 156:14, 161:7 resignatio n [2] - 156:9, 157:20 resignatio ns [1] - 161:14 resigned [6] - 154:14, 155:6, 155:11, 157:7, 161:5, 163:12 resigning [1] - 164:6 resolution [4] -
---	--	---	--	---	--	--	--	--

119:12, 122:13, 186:7, 186:9 Resolutio n [18] - 7:3, 7:6, 7:21, 7:23, 94:19, 94:23, 172:11, 174:1, 174:13, 174:22, 175:17, 177:2, 177:8, 179:1, 179:13, 180:11, 186:17, 187:2 resolve [1] - 90:7 resolved [1] - 119:13 resource [1] - 138:14 resources [2] - 238:18, 241:10 respect [5] - 81:13, 117:25, 126:20, 140:23, 216:11 respective [1] - 10:22 respond [1] - 31:4 responded [4] - 71:7, 71:12, 123:21, 188:7 Response [3] - 210:23, 211:12, 238:2 response [10] - 34:5, 44:3, 71:13, 142:13, 142:18, 155:13, 156:9, 240:23, 250:8,	263:25 responses [6] - 41:25, 42:2, 42:5, 42:7, 42:9, 42:10 responsibi lities [7] - 5:24, 13:17, 14:1, 37:6, 37:17, 38:17, 45:7 responsibi lity [4] - 4:9, 41:15, 41:22, 74:20 responsibl e [6] - 19:2, 41:9, 46:12, 48:25, 49:25, 76:9 rest [1] - 194:25 restate [2] - 28:2, 191:21 restating [1] - 176:18 restorative [1] - 236:16 restoring [2] - 236:18, 236:19 restricting [1] - 93:7 result [3] - 74:6, 89:22, 206:19 resulted [3] - 13:11, 100:11, 252:19 results [5] - 34:4, 241:21, 243:11, 245:1, 255:3 retained [7] - 59:16,	60:8, 60:13, 61:11, 68:21, 69:1, 70:5 retested [2] - 58:20, 59:13 rethought [1] - 268:16 retired [1] - 220:25 return [1] - 111:18 returned [2] - 40:3, 41:22 reveal [1] - 54:13 revenue [1] - 80:20 review [7] - 30:21, 31:25, 46:14, 50:3, 148:9, 240:6, 260:13 reviewed [15] - 8:25, 30:18, 44:25, 53:16, 132:9, 146:24, 157:9, 174:19, 178:8, 181:22, 198:21, 207:20, 208:20, 213:7, 213:19 reviewing [6] - 21:6, 41:21, 41:23, 75:15, 213:10, 266:19 revise [1] - 89:7 revised [39] - 13:7, 16:22, 17:7, 17:8, 17:14, 34:23, 35:14, 35:21,	36:3, 92:5, 95:13, 95:18, 95:20, 98:2, 113:17, 116:13, 120:14, 132:25, 134:12, 134:19, 136:5, 143:16, 143:17, 166:7, 166:9, 168:25, 171:23, 172:7, 177:18, 178:17, 178:25, 191:15, 191:20, 192:15, 210:8, 214:13, 215:17, 216:11, 253:2 revision [2] - 89:19, 89:22 revisions [1] - 117:6 revocation [16] - 4:6, 4:12, 6:12, 7:1, 9:20, 10:5, 10:8, 10:9, 10:18, 11:14, 14:21, 122:11, 122:19, 128:10, 176:7, 187:20 Revocatio n [1] - 9:1 Richard [2] - 146:13, 146:14 rights [3] - 13:17, 13:25, 26:25 rigor [2] - 221:24, 253:9	risk [39] - 100:12, 104:1, 104:11, 109:19, 110:3, 110:4, 112:12, 112:18, 112:22, 113:10, 116:3, 116:5, 116:9, 116:10, 116:12, 120:20, 194:4, 195:15, 195:18, 196:25, 197:14, 198:10, 198:16, 200:8, 200:13, 200:16, 201:4, 201:9, 201:25, 202:13, 202:16, 202:19, 204:18, 205:10, 205:16, 205:22, 223:8, 254:9 Rivera [1] - 261:14 RLICS [3] - 97:20, 97:22, 97:24 Road [1] - 1:14 Robert [5] - 78:4, 160:12, 160:13, 161:2 robust [3] - 42:6, 101:13, 227:10 role [32] - 17:18, 35:14, 35:17, 35:20, 36:2, 36:8, 36:11,	36:13, 38:7, 38:10, 39:3, 39:5, 39:14, 40:25, 41:4, 41:8, 44:22, 46:1, 51:25, 84:1, 138:14, 153:15, 153:18, 153:21, 154:10, 160:16, 162:4, 164:8, 164:13, 164:15, 164:21, 217:25 rolling [2] - 58:16, 59:7 rolls [4] - 117:10, 117:12, 166:21, 250:18 room [3] - 5:15, 84:10, 212:11 roots [3] - 79:10, 82:19, 113:4 roster [1] - 248:13 roughly [1] - 53:5 route [1] - 249:16 row [3] - 126:11, 244:10, 244:12 RPR [2] - 1:23, 271:12 RSD [2] - 100:2, 206:10 RTI [1] - 210:20 RTII [5] - 210:20, 228:13, 228:15, 249:20,	258:1 Rules [2] - 31:8, 31:13 rulings [1] - 7:9 run [3] - 86:7, 111:15, 212:10 running [6] - 5:2, 90:21, 102:14, 141:10, 222:20, 260:9 S S.A [2] - 47:18, 47:22 salary [2] - 37:7, 38:18 same- aged [1] - 100:18 Sanchez [11] - 42:23, 42:24, 44:10, 44:15, 44:16, 44:22, 70:14, 139:14, 140:3, 162:23 sat [1] - 162:21 SAT's [1] - 223:24 satisfactio n [1] - 147:14 satisfied [1] - 73:6 satisfy [2] - 89:9, 147:8 save [1] - 228:11 saves [1] - 252:25 scale [4] - 28:8, 63:18, 64:12, 67:12 scales [1] - 67:23	schedule [2] - 8:7, 8:9 scheduled [2] - 6:15, 6:19 schedulin g [1] - 242:3 school [144] - 4:13, 18:8, 18:9, 18:14, 20:9, 20:20, 21:10, 21:11, 25:18, 25:22, 26:21, 29:6, 30:8, 32:8, 32:13, 38:2, 38:22, 40:22, 41:1, 43:16, 48:1, 48:21, 49:1, 49:11, 49:18, 51:21, 52:2, 52:17, 53:9, 53:12, 54:7, 54:14, 54:22, 56:21, 57:4, 61:12, 68:22, 69:2, 69:8, 69:12, 76:8, 84:10, 84:11, 84:14, 84:16, 85:5, 89:9, 90:20, 91:8, 91:10, 91:15, 91:17, 91:23, 98:17,	98:23, 98:25, 102:14, 104:12, 111:23, 112:24, 113:15, 120:18, 122:17, 122:18, 132:4, 142:2, 142:9, 146:19, 146:21, 146:22, 148:13, 148:17, 148:23, 149:20, 149:22, 149:25, 150:6, 150:20, 150:25, 151:2, 152:6, 170:7, 170:12, 171:13, 179:18, 180:4, 184:23, 185:1, 188:13, 193:15, 193:16, 193:17, 193:23, 194:5, 194:8, 199:15, 199:20, 200:10, 201:7, 202:17, 203:14, 208:2, 210:18, 213:3, 215:24, 216:23, 221:2, 221:16, 221:23, 226:9, 228:21, 228:22, 232:10, 232:20, 238:15, 239:9, 239:13, 239:15,
---	---	---	---	--	---	---	--	---

239:18, 240:15, 241:3, 241:5, 246:7, 249:7, 249:8, 249:15, 249:24, 253:10, 253:11, 253:16, 253:18, 255:14, 256:23, 258:16, 261:6, 261:10, 261:17, 263:19, 264:18, 266:3, 268:2 SCHOOL [1] - 1:1 School [512] - 1:7, 1:15, 1:20, 3:6, 3:8, 3:17, 3:18, 4:1, 4:4, 4:7, 4:15, 5:6, 5:7, 6:9, 6:10, 6:11, 6:12, 6:13, 7:2, 8:1, 9:1, 9:12, 9:22, 10:1, 10:3, 10:6, 10:14, 10:16, 12:8, 12:10, 12:11, 12:13, 12:15, 12:20, 12:25, 13:2, 13:4, 13:8, 13:18, 13:21, 14:1, 14:25, 15:21, 16:14, 17:4, 17:15,	17:18, 18:12, 18:17, 18:18, 18:20, 19:12, 20:6, 20:7, 23:4, 23:12, 23:24, 24:13, 24:15, 24:21, 24:24, 25:5, 25:7, 25:20, 26:4, 26:19, 27:14, 27:25, 28:9, 28:25, 29:4, 29:13, 33:16, 33:22, 34:9, 34:22, 34:24, 35:10, 35:15, 36:20, 36:23, 37:4, 37:6, 37:11, 38:5, 38:8, 38:16, 38:20, 39:2, 40:13, 41:3, 42:20, 42:25, 43:19, 44:4, 44:5, 45:2, 45:4, 45:9, 46:11, 46:12, 46:25, 47:3, 47:7, 47:24, 48:21, 49:11, 49:17, 49:20, 50:1,	50:3, 50:13, 50:24, 51:5, 51:10, 51:15, 52:1, 52:5, 52:12, 52:17, 52:19, 53:8, 54:4, 55:1, 55:12, 55:17, 56:3, 56:4, 56:21, 57:22, 58:14, 59:4, 59:11, 59:14, 59:17, 60:12, 60:17, 61:2, 61:22, 62:7, 62:22, 67:8, 67:18, 67:21, 68:1, 68:12, 69:1, 69:6, 69:12, 71:6, 71:16, 71:17, 72:1, 72:14, 72:23, 73:17, 74:23, 75:2, 76:8, 76:24, 77:10, 77:12, 77:13, 77:17, 78:13, 81:10, 81:14, 81:15, 81:17, 81:19, 81:23, 82:2, 82:6, 83:1,	83:24, 84:1, 84:5, 84:7, 84:11, 85:12, 85:14, 85:22, 86:4, 86:22, 87:2, 87:24, 88:18, 88:20, 88:24, 90:3, 90:18, 90:21, 95:8, 96:18, 98:1, 99:21, 100:6, 100:13, 100:17, 101:4, 101:8, 102:2, 102:3, 102:22, 102:24, 103:9, 103:15, 103:16, 103:23, 103:24, 104:3, 104:8, 105:12, 106:9, 106:10, 107:14, 107:22, 108:7, 108:13, 108:19, 108:23, 109:10, 109:20, 109:25, 110:12, 110:19, 111:15, 113:11, 113:23, 115:17, 116:15, 117:2, 117:8, 117:10, 118:1, 118:24, 119:8, 119:13,	119:14, 119:16, 119:19, 120:11, 120:14, 120:17, 120:19, 120:22, 121:20, 121:22, 122:3, 122:5, 122:14, 122:18, 122:21, 123:3, 123:4, 123:7, 123:10, 123:12, 123:21, 123:24, 125:9, 125:25, 126:4, 126:20, 127:4, 127:13, 128:6, 128:12, 128:13, 128:24, 129:3, 129:19, 129:20, 130:6, 131:23, 132:1, 132:3, 134:22, 135:15, 135:21, 136:1, 136:3, 136:16, 136:18, 136:21, 136:22, 137:4, 137:11, 137:25, 138:10, 138:15, 138:25, 139:1, 139:4, 139:7, 139:8, 139:21, 140:4, 140:7, 140:12, 141:10, 141:15,	141:18, 142:10, 142:15, 143:20, 144:1, 144:14, 145:8, 146:8, 152:10, 152:12, 152:15, 153:2, 153:4, 154:3, 154:11, 154:19, 155:10, 157:12, 158:2, 158:15, 159:4, 159:7, 159:13, 160:5, 160:22, 160:24, 161:1, 161:11, 161:15, 161:19, 161:21, 162:19, 162:24, 162:25, 163:1, 163:14, 164:8, 165:25, 167:3, 167:8, 167:11, 170:4, 171:4, 172:9, 172:18, 173:10, 174:5, 174:6, 175:4, 175:7, 175:10, 175:13, 176:8, 176:20, 177:11, 178:7, 178:10, 178:18, 178:24, 179:1, 179:6, 179:7, 180:18,	180:21, 181:17, 181:21, 182:10, 182:13, 182:21, 183:18, 184:10, 185:12, 185:18, 185:24, 186:2, 186:3, 187:9, 187:19, 188:3, 188:4, 188:6, 188:15, 188:18, 188:25, 189:15, 189:20, 191:13, 191:19, 191:25, 192:10, 192:15, 193:1, 193:5, 193:7, 193:11, 193:18, 194:18, 195:25, 196:3, 196:7, 196:9, 196:10, 196:14, 196:18, 196:22, 196:25, 197:4, 197:8, 197:24, 197:25, 198:25, 199:5, 199:8, 200:7, 200:21, 200:23, 200:24, 200:25, 201:17, 201:22, 202:7, 202:11, 203:3, 203:17, 203:19, 204:4, 204:16,	205:9, 205:15, 205:23, 206:10, 206:16, 207:2, 208:6, 209:4, 210:14, 210:18, 211:12, 211:16, 211:19, 211:21, 212:2, 212:3, 212:4, 212:5, 212:19, 213:8, 214:22, 215:16, 215:19, 216:10, 216:19, 217:14, 217:25, 218:1, 218:4, 218:10, 218:21, 218:23, 219:17, 220:2, 220:12, 220:13, 220:15, 220:17, 221:7, 221:12, 222:12, 222:16, 222:24, 223:3, 224:7, 224:12, 225:24, 226:1, 230:1, 230:10, 230:12, 230:14, 231:14, 232:23, 233:5, 240:23, 240:24, 246:15, 246:21, 251:20, 254:8, 254:22, 261:11, 261:15,	263:18, 265:10, 266:1, 266:7 School's [22] - 14:11, 14:18, 41:11, 51:20, 70:18, 100:9, 100:12, 114:7, 117:6, 120:12, 125:25, 126:5, 133:15, 135:25, 153:13, 154:18, 162:7, 198:7, 213:5, 214:13, 252:6, 263:12 school's [4] - 18:1, 19:3, 128:12, 214:6 Schools [3] - 81:25, 98:15, 214:19 schools [30] - 33:14, 41:14, 50:8, 67:3, 67:14, 67:19, 97:12, 98:6, 146:1, 195:16, 195:17, 198:1, 209:8, 221:20, 221:22, 221:24, 226:10, 230:21, 242:3, 242:9, 245:23, 245:24, 253:10, 253:12, 254:3,
---	---	---	--	--	--	--	---	---

254:24, 255:5, 259:8, 264:5, 268:4 Science [2] - 224:8, 234:22 science [2] - 246:19, 247:2 scope [5] - 9:15, 71:9, 79:20, 96:14 score [15] - 28:7, 63:18, 65:3, 66:9, 66:11, 73:20, 73:22, 98:8, 106:2, 133:20, 228:1, 228:5, 249:13, 256:3, 264:16 scored [6] - 28:9, 28:10, 28:12, 28:20, 28:22, 253:21 scores [35] - 30:6, 32:15, 32:19, 32:20, 41:24, 41:25, 56:24, 57:8, 57:9, 58:3, 59:2, 59:10, 60:21, 60:22, 61:3, 63:6, 63:9, 63:25, 64:10, 64:17, 64:25, 66:6, 66:15, 126:21,	133:25, 170:3, 225:10, 225:11, 225:24, 225:25, 226:2, 226:18, 229:5, 250:9 scoring [4] - 99:10, 126:6, 133:15, 263:13 Scranton [1] - 258:24 scratch [4] - 21:5, 23:22, 25:24, 137:2 screen [1] - 248:16 scrutinize d [1] - 71:19 seal [1] - 224:23 seamlessl y [1] - 104:12 searched [1] - 248:19 second [31] - 3:10, 4:3, 6:22, 34:17, 54:12, 60:21, 61:2, 82:7, 88:21, 120:6, 120:7, 120:9, 137:9, 143:7, 145:5, 151:6, 193:21, 212:13, 213:5, 216:18, 219:13, 227:2, 234:2, 240:21, 242:8, 243:13, 246:23, 254:9,	254:12, 263:11 secundaril y [1] - 118:9 secondary [2] - 110:20, 221:23 secret [1] - 161:24 Secretary [5] - 160:13, 209:23, 254:25, 261:14, 261:15 section [9] - 28:16, 30:10, 30:12, 30:24, 44:17, 59:16, 137:18, 137:19, 239:24 Section [4] - 10:5, 120:22, 176:8, 215:6 sections [8] - 44:6, 44:8, 44:23, 70:8, 98:9, 224:3, 232:20, 239:10 secure [1] - 248:12 see [77] - 4:25, 10:11, 19:17, 19:24, 21:11, 22:7, 22:14, 24:1, 25:11, 28:5, 30:22, 32:10, 33:25, 41:25, 42:2, 48:18, 49:7, 49:12, 49:13,	50:11, 51:9, 51:24, 54:15, 57:1, 60:10, 61:18, 65:23, 90:15, 94:13, 97:4, 97:16, 105:17, 139:24, 147:1, 157:4, 157:12, 158:24, 159:13, 159:18, 159:21, 159:23, 160:5, 166:22, 168:23, 169:7, 169:18, 169:21, 169:22, 176:19, 176:23, 177:14, 179:25, 180:12, 180:15, 189:4, 195:15, 197:24, 213:22, 214:2, 214:10, 215:7, 215:25, 225:9, 196:3, 196:18, 226:2, 227:21, 229:14, 229:24, 230:4, 230:5, 233:4, 234:12, 238:1, 238:8, 239:11, 246:7, 257:14, 263:8 seeing [2] - 71:12, 250:9 seek [5] - 82:16, 111:18,	128:22, 191:19, 191:25 seeking [11] - 6:2, 13:15, 13:20, 14:14, 101:8, 105:9, 134:25, 137:18, 137:20, 151:24, 192:15 segment [1] - 61:10 selected [5] - 81:7, 148:10, 243:15, 243:18, 244:16 selection [1] - 103:12 semester [2] - 242:5, 242:10 semi [1] - 170:3 semi- colon [1] - 170:3 Senate [1] - 268:21 send [1] - 114:1 sending [1] - 50:7 Senior [4] - 126:4, 171:3, 196:3, 196:18 sense [24] - 103:10, 121:11, 127:24, 134:14, 134:16, 134:21, 155:12, 155:19, 173:5, 200:18, 203:7, 205:6, 224:14, 225:15, 226:23, 239:5, 253:24, 256:15,	257:2, 258:1, 264:21, 265:6, 268:6 sent [11] - 24:24, 25:4, 114:17, 114:18, 140:3, 142:10, 146:13, 146:14, 146:15, 159:6, 188:3 sentence [10] - 27:11, 55:10, 120:7, 120:9, 122:8, 157:17, 161:11, 166:19, 240:22, 263:11 sentences [3] - 120:8, 133:7, 136:13 separate [8] - 3:14, 11:10, 11:21, 137:22, 140:17, 141:6, 155:14, 235:15 Septembe r [20] - 2:14, 2:16, 11:5, 12:22, 18:4, 24:2, 65:22, 111:21, 144:22, 145:18, 148:21, 149:5, 150:7, 151:10, 191:25, 229:2, 229:9, 230:25, 250:15 sequence	[3] - 223:17, 225:19, 258:11 sequence s [1] - 259:2 series [4] - 130:9, 148:18, 185:7, 190:23 serious [3] [1] - 116:12, 181:2, 203:15 serve [18] - 3:7, 84:11, 84:25, 103:25, 134:23, 134:24, 136:18, 137:25, 160:21, 163:8, 164:21, 168:22, 193:1, 195:9, 195:10, 195:12, 203:21 served [11] - 36:13, 40:10, 59:13, 77:18, 78:20, 138:11, 163:15, 163:22, 163:25, 164:7, 220:5 serves [5] - 67:11, 69:13, 162:7, 164:13, 195:6 service [6] - 18:13, 108:10, 115:2, 162:1, 165:2, 184:20 SERVICE [2] - 1:23, 271:15 services [3] - 80:21,	135:23, 221:21 serving [7] - 16:2, 36:8, 36:11, 77:11, 101:19, 142:1, 193:2 session [1] - 8:6 sessions [1] - 6:14 set [26] - 14:19, 36:3, 42:12, 62:9, 92:8, 113:13, 125:22, 126:8, 127:19, 133:12, 145:11, 145:17, 149:24, 157:20, 169:10, 176:6, 197:22, 215:16, 226:11, 227:16, 228:18, 228:19, 230:22, 238:16, 241:6, 242:9 sets [3] - 75:4, 103:22, 103:25 setting [4] - 4:25, 12:3, 90:3, 170:7 settled [1] - 239:9 seven [5] - 16:10, 126:22, 126:23, 133:21, 136:16 seven- member [1] - 136:16 several [11] - 8:12,	16:7, 56:5, 100:18, 101:23, 144:5, 155:25, 169:1, 193:13, 222:9, 230:22 severe [3] - 106:11, 106:20, 112:17 severely [1] - 25:20 shall [8] - 126:7, 133:16, 135:15, 135:22, 136:2, 137:25, 206:17, 263:14 share [2] - 5:2, 42:15 shared [8] - 7:18, 8:19, 42:10, 42:18, 43:19, 137:22, 172:25, 192:19 sharing [2] - 135:24, 137:11 shift [7] - 100:10, 236:3, 238:6, 238:20, 252:18, 253:13, 254:7 ship [1] - 40:8 short [1] - 74:11 Short [2] - 76:15, 212:15 show [7] - 62:5, 68:5, 73:14, 181:2, 231:5, 233:4, 256:1 showed [2] - 109:21,
--	--	--	---	---	---	--	---	---

109:24 showing [2] - - 63:21, 169:23 shown [2] - 25:25, 26:8 shows [1] - 231:7 sic [1] - 6:24 side [5] - 224:10, 227:24, 232:6, 232:18, 237:5 sides [1] - 31:10 sign [5] - 109:1, 109:2, 124:1, 157:13, 173:18 signature [1] - 111:9 signatures [1] - 109:4 signed [11] - 103:19, 107:13, 108:25, 109:3, 145:13, 172:15, 175:1, 175:3, 176:15, 182:3, 182:7 significant [12] - 62:25, 79:13, 84:19, 84:22, 84:23, 91:13, 91:14, 95:7, 100:14, 191:8, 203:10, 258:2 significant ly [2] - 141:1, 253:5 silence [1] - 5:12 silly [2] - 243:1, 255:7	similar [2] - 70:20, 232:4 similarly [1] - 32:14 simply [7] - 31:17, 72:13, 160:16, 186:5, 191:6, 198:14, 267:19 simultane ously [1] - 163:15 sincerely [2] - 202:23, 264:5 single [9] - 45:13, 47:6, 47:9, 50:14, 50:19, 50:20, 201:20, 237:11 Sinking [1] - 1:24 sit [3] - 12:1, 248:16, 251:2 site [1] - 108:14 sitting [21] - 50:12, 50:18, 54:20, 57:12, 61:13, 61:15, 69:21, 87:5, 88:11, 111:25, 161:23, 162:18, 167:21, 170:11, 197:8, 199:4, 199:18, 208:9, 212:4, 229:19, 252:23 situations [1] - 191:9 six [5] - 18:3, 182:6,	220:23, 222:8, 260:21 six-month [1] - 18:3 size [1] - 255:13 sizing [1] - 265:23 skills [9] - 55:11, 83:6, 83:8, 83:14, 98:11, 104:16, 104:25, 105:15 slew [1] - 255:10 slightly [1] - 256:4 slope [1] - 66:15 slower [1] - 258:9 small [7] - 62:12, 80:1, 102:17, 194:22, 199:2, 225:7, 231:14 smaller [2] - 22:24, 62:20 Smith [3] - 70:17, 129:18 snapshot [7] - 27:24, 29:15, 29:16, 33:21, 56:25, 57:6, 58:25 SO [1] - 269:23 so... [2] - 52:23, 182:19 social [14] - 81:5, 100:15, 106:21, 107:16, 108:2, 108:9, 112:17, 116:11, 116:12, 194:10,	197:4, 200:9, 202:20, 203:16 socially [2] - 195:11, 198:5 solid [3] - 195:11, 195:12, 198:4 solution [1] - 192:6 solve [1] - 93:6 someone [12] - 84:15, 112:23, 171:8, 171:16, 193:14, 193:24, 198:14, 210:4, 267:1, 267:2 sometime s [4] - 46:10, 247:9, 258:5 somewher e [2] - 193:23, 242:2 song [1] - 255:6 soon [1] - 231:1 sorry [22] - 17:9, 31:3, 45:10, 71:9, 72:7, 97:17, 100:21, 105:19, 105:21, 121:23, 121:24, 124:6, 133:9, 135:20, 163:2, 191:21, 206:5, 207:17, 217:1, 241:20, 256:20 sort [20] - 40:2,	58:2, 63:21, 153:1, 155:19, 181:7, 200:5, 223:20, 226:22, 232:20, 234:23, 237:4, 243:24, 247:14, 256:12, 259:13, 261:16, 265:19, 266:5, 268:13 sorts [2] - 264:3, 268:11 sound [4] - 144:9, 144:10, 151:21, 151:22 soundnes s [1] - 144:18 sounds [1] - 255:6 source [1] - 27:1 sources [1] - 75:5 southeast ern [1] - 79:15 Southeast ern [1] - 81:9 space [1] - 135:25 speaking [6] - 53:24, 81:18, 89:4, 89:5, 141:21, 209:21 speaks [1] - 206:14 special [1] - 7:20 Special [2] - 2:15, 257:11 Specialist [3] - 42:21, 72:4, 73:21 specialize	d [1] - 80:10 specific [25] - 34:7, 38:16, 39:10, 42:9, 42:19, 66:9, 83:14, 84:8, 86:14, 86:15, 99:13, 100:2, 152:9, 152:11, 180:14, 183:17, 193:8, 197:2, 199:4, 199:18, 199:25, 200:1, 200:4, 204:2, 206:11 specificall y [20] - 7:23, 11:5, 14:14, 25:15, 36:1, 45:5, 47:15, 53:25, 54:19, 82:16, 102:21, 156:20, 177:25, 185:3, 203:12, 210:12, 215:3, 241:18, 245:19, 252:17 specifics [1] - 68:9 specified [4] - 111:16, 111:17, 141:3 specifies [1] - 152:6 specify [3] - 111:19, 144:7, 144:11 spectrum	[1] - 100:15 speculate [1] - 265:21 spell [4] - 15:10, 15:15, 77:6, 219:23 spelled [3] - 102:9, 183:25, 184:5 spelling [1] - 162:10 spent [3] - 220:20, 220:23, 225:16 spirit [4] - 34:25, 35:5, 101:22, 173:15 split [1] - 37:7 spot [5] - 100:22, 102:8, 110:1, 201:3, 201:4 spots [1] - 110:2 Spotts [2] - 144:23, 146:22 SPP [9] - 223:3, 254:23, 255:8, 255:16, 256:3, 256:15, 256:23, 261:5, 261:17 SPP's [1] - 254:8 spreading [1] - 258:6 spreadshe ets [1] - 56:5 spring [28] - 29:19, 32:15, 33:25, 37:22, 58:24, 59:20, 60:23, 68:23,	69:4, 75:1, 75:7, 75:10, 75:16, 75:17, 76:3, 119:7, 145:14, 148:2, 184:13, 184:24, 239:6, 242:12, 244:21, 244:22, 245:4, 245:8, 245:17 Spring [2] - 1:24, 143:18 squabble [1] - 178:24 square [2] - 149:9, 149:16 Stacey [23] - 1:17, 2:4, 2:5, 2:7, 2:8, 2:9, 3:20, 4:10, 8:5, 8:13, 8:16, 10:12, 11:16, 12:9, 12:17, 14:23, 23:1, 31:23, 71:3, 76:22, 124:8, 166:12, 166:15 STACEY [71] - 8:17, 9:14, 11:17, 12:9, 12:19, 14:25, 15:6, 15:9, 15:14, 17:5, 19:11, 19:13, 22:5, 23:3, 23:6,	26:14, 31:4, 31:6, 31:21, 31:24, 32:22, 33:3, 34:13, 44:12, 71:4, 71:14, 73:11, 73:12, 74:7, 75:13, 76:24, 77:5, 94:4, 102:23, 103:1, 105:21, 105:24, 118:13, 124:12, 124:25, 127:12, 128:3, 130:1, 130:17, 130:20, 131:9, 143:7, 143:9, 151:5, 152:16, 162:11, 165:5, 165:10, 206:3, 210:3, 210:6, 211:3, 217:19, 219:3, 219:11, 219:14, 219:16, 219:22, 221:18, 229:20, 229:25, 262:2, 265:7, 266:22, 267:23, 269:13 staff [10] - 18:19, 20:8, 20:12, 32:6, 41:2, 42:18, 45:8,
--	--	--	---	---	---	---	---	--

46:23, 71:23, 72:4, 82:22, 113:3, 128:13, 135:24, 138:25, 142:4, 150:2, 156:14, 248:19 stage [2] - 87:8, 149:25 stand [1] - 67:1 standard [14] - 13:16, 33:13, 101:24, 101:25, 105:11, 116:9, 127:19, 129:20, 201:15, 208:2, 263:19, 265:11, 267:19, 268:25 standardiz ed [6] - 34:3, 99:11, 106:2, 125:20, 126:20, 250:9 Standards [7] - 100:10, 209:2, 241:10, 252:19, 253:2, 253:3 standards [17] - 13:25, 42:7, 110:24, 122:4, 122:6, 122:13, 128:23, 129:4, 129:12, 130:4, 130:10, 134:3, 173:11,	192:18, 209:6, 265:21 standpoint [3] - 251:8, 253:18, 256:7 stands [2] - 78:24, 86:9 start [10] - 3:22, 38:15, 93:25, 108:8, 111:16, 111:17, 111:19, 111:20, 183:9, 261:4 started [13] - 37:12, 39:2, 74:22, 79:25, 119:2, 119:6, 119:7, 152:25, 220:19, 237:9, 237:10, 238:21, 239:9 starting [4] - 36:9, 37:11, 184:23, 239:8 starts [1] - 237:3 startup [7] - 17:19, 17:23, 17:25, 119:8, 146:19, 146:21, 146:22 State [32] - 24:13, 40:15, 42:7, 52:8, 52:13, 110:23, 118:24, 125:24, 133:14, 140:17, 222:6, 224:24, 225:21,	226:4, 226:12, 229:3, 229:4, 231:2, 238:24, 242:8, 245:25, 248:24, 253:9, 253:21, 253:23, 254:2, 255:13, 261:6, 261:14, 268:3 state [13] - 15:9, 15:15, 36:1, 41:8, 52:14, 77:6, 91:5, 102:21, 116:14, 128:8, 151:25, 219:23, 227:20 State's [2] - 209:1, 252:18 state's [1] - 100:10 statement [29] - 5:23, 6:7, 14:10, 14:19, 14:20, 34:21, 35:6, 35:11, 36:3, 54:23, 55:2, 55:8, 55:9, 88:12, 96:20, 103:17, 103:25, 156:9, 157:10, 157:15, 176:25, 177:1, 177:3, 205:12, 207:17, 214:1, 215:7,	243:1, 252:23 statement s [9] - 118:1, 118:10, 207:25, 208:11, 209:23, 210:2, 211:15, 217:16, 240:14 states [5] - 6:9, 26:20, 159:11, 177:11, 206:16 Statewide [1] - 226:16 stating [3] - 11:19, 127:16, 244:15 statistical [1] - 227:10 statisticall y [2] - 62:24, 228:10 statistics [1] - 222:3 statute [2] - 176:11, 176:18 statutory [1] - 7:13 Stenograp her [4] - 4:17, 5:11, 5:17, 12:2 step [3] - 111:3, 154:21, 173:15 steps [2] - 187:20, 207:1 Stevens [2] - 144:23, 146:23 still [19] - 43:2, 90:21, 123:1, 124:15, 153:15, 160:15, 164:13, 164:21,	172:24, 172:25, 176:15, 186:15, 190:14, 193:15, 221:4, 235:22, 249:11, 260:18, 260:20 stipulation [1] - 151:16 stop [6] - 38:4, 85:6, 122:7, 122:22, 126:10, 211:7 stopped [1] - 74:24 story [4] - 23:11, 24:11, 24:21, 25:19 straight [1] - 214:13 straighten [1] - 152:14 streamline d [1] - 158:18 Street [26] - 1:8, 1:18, 6:18, 143:19, 143:25, 145:4, 145:7, 147:17, 147:23, 147:25, 148:7, 149:7, 149:8, 149:10, 149:13, 151:16, 152:1, 183:11, 187:16, 187:22, 188:5, 188:7, 188:8, 188:20, 189:1 streets [1] - 113:4 strengths	[3] - 34:1, 224:4, 251:17 strict [2] - 31:8, 31:13 strictly [1] - 242:22 strictures [1] - 11:8 strike [3] - 66:5, 73:14, 151:1 Stroman [2] - 175:3, 182:4 strong [3] - 91:23, 111:2, 257:3 structure [2] - 222:9, 224:2 structured [1] - 99:5 structures [1] - 256:2 student [93] - 19:18, 19:20, 20:6, 20:10, 21:13, 23:13, 28:12, 29:8, 29:19, 30:9, 33:12, 41:16, 42:2, 42:9, 42:13, 45:12, 45:13, 45:15, 45:23, 46:2, 46:19, 47:6, 47:9, 47:14, 47:17, 47:22, 47:25, 48:1, 48:9, 48:17, 48:20, 50:14, 57:8, 57:19, 60:11,	61:1, 64:8, 64:17, 64:20, 66:6, 66:9, 66:11, 66:15, 70:3, 72:11, 72:17, 72:19, 73:4, 73:16, 74:3, 74:15, 74:22, 76:4, 76:7, 94:24, 96:14, 99:8, 107:20, 107:24, 109:24, 110:3, 110:4, 113:22, 114:1, 114:12, 116:5, 116:8, 132:2, 140:23, 174:11, 197:19, 197:20, 198:22, 200:13, 200:16, 200:19, 200:22, 201:17, 201:24, 202:12, 202:16, 202:18, 211:21, 226:1, 227:7, 243:2, 247:2, 249:24, 250:25, 251:8, 251:20 student's [9] - 32:7, 49:1, 61:22, 62:5, 62:6, 68:6, 203:7,	225:11 students [275] - 20:15, 23:12, 24:11, 25:20, 26:6, 26:9, 26:19, 27:6, 28:1, 28:9, 28:18, 28:23, 29:3, 29:5, 29:16, 29:22, 32:12, 32:18, 32:21, 33:20, 34:1, 34:11, 40:13, 40:14, 41:11, 41:19, 41:20, 45:6, 46:20, 47:12, 49:7, 50:8, 55:7, 55:15, 55:16, 55:17, 56:11, 56:15, 56:18, 57:10, 57:14, 58:3, 58:13, 58:20, 59:12, 59:20, 59:21, 59:24, 60:3, 60:4, 60:13, 60:16, 60:21, 61:25, 62:9, 62:11, 62:14, 62:18, 62:24, 63:25, 65:1,	65:5, 65:12, 65:16, 66:5, 66:10, 68:19, 68:20, 69:1, 69:6, 69:11, 69:23, 70:22, 70:24, 71:25, 72:8, 72:10, 72:24, 73:2, 73:7, 73:19, 74:1, 74:12, 83:22, 84:12, 84:20, 84:22, 85:25, 88:22, 90:15, 90:16, 90:19, 91:6, 91:8, 91:15, 93:5, 93:7, 93:22, 95:19, 96:12, 96:15, 100:13, 102:1, 102:13, 104:24, 105:15, 106:8, 106:13, 106:19, 106:23, 107:17, 108:2, 108:10, 108:11, 109:12, 109:18, 109:19, 110:4, 111:22, 112:2, 112:11, 112:19, 112:21, 112:22, 113:9,
--	---	---	--	---	--	---	---	--

113:15, 114:4, 115:2, 115:25, 116:2, 117:7, 117:8, 117:11, 117:16, 118:14, 118:17, 118:20, 118:23, 119:20, 120:17, 126:6, 126:19, 131:24, 133:15, 134:23, 134:24, 166:21, 167:2, 167:9, 168:1, 169:11, 170:21, 170:23, 171:14, 174:14, 174:16, 176:22, 180:14, 180:17, 180:18, 180:19, 180:22, 193:1, 194:3, 194:10, 194:22, 195:9, 195:10, 195:11, 195:12, 196:3, 196:17, 196:21, 196:24, 197:3, 197:8, 197:11, 198:2, 198:8, 198:18, 198:25, 199:6, 199:9, 199:13, 199:15, 200:8, 200:9, 201:8, 201:22,	203:9, 203:13, 203:14, 203:15, 203:18, 203:22, 204:5, 204:10, 204:17, 205:9, 205:16, 211:17, 211:24, 212:3, 216:7, 217:21, 217:22, 223:8, 223:23, 224:16, 224:19, 225:8, 225:18, 226:17, 226:19, 227:20, 227:22, 228:4, 229:1, 229:5, 230:20, 231:6, 231:10, 236:10, 236:19, 238:22, 239:11, 241:13, 242:3, 242:6, 242:14, 242:20, 243:15, 243:18, 243:20, 243:21, 243:22, 244:8, 244:15, 245:6, 245:11, 245:13, 245:17, 246:2, 246:20, 247:12, 248:5, 249:3, 250:15, 251:12, 253:17, 253:21, 254:9, 255:22,	255:25, 256:13, 257:11, 258:2, 258:9, 259:2, 259:11, 260:14, 261:8, 263:13, 263:17, 264:20, 264:22, 264:23, 269:1, students' [10] - 18:23, 24:22, 27:5, 29:17, 41:25, 42:5, 42:6, 51:5, 58:25, 64:6 Studies [1] - 40:19 stuff [4] - 239:10, 249:1, 265:20, 267:4 subject [2] - 167:4, 251:18 subjective [1] - 202:25 submit [4] - 4:2, 114:5, 140:8, 140:9 submitted [16] - 3:17, 8:1, 10:17, 10:20, 12:20, 13:8, 20:7, 34:24, 52:8, 84:5, 87:3, 110:8, 147:13, 178:17, 178:25, 191:24	submitting [1] - 171:23 Subparagr aph [1] - 207:16 subparagr aphs [1] - 262:4 subpoena s [1] - 7:8 subseque nt [5] - 30:24, 72:15, 125:23, 133:13, 174:21 subseque ntly [1] - 53:21 substantia l [1] - 193:20 substantia lly [3] - 101:20, 126:1, 134:13 substantiv e [1] - 90:9 succeed [2] - 236:20, 243:6 succeede d [1] - 78:3 Success [2] - 238:10, 238:18 success [2] - 223:19, 258:3 successes [1] - 141:9 successfu l [7] - 90:17, 91:6, 91:25, 200:23, 225:20, 245:11, 246:3 sudden [1] - 254:5 suffer [2] - 100:15, 200:9 suffering [4] - 106:23, 106:24, 116:10,	194:10 sufficient [6] - 62:10, 107:6, 134:16, 175:23, 176:2, 227:7 suggest [3] - 31:16, 256:9, 261:11 suggested [5] - 201:10, 250:20, 256:11, 256:13, 262:17 suggestin g [6] - 68:25, 195:17, 201:16, 209:16, 211:19, 268:24 suggestio n [2] - 246:13, 246:15 Suite [1] - 1:18 sum [1] - 41:24 summary [1] - 113:20 summativ e [2] - 42:13, 43:23 summer [5] - 149:4, 150:4, 183:8, 248:20, 249:14 Superinte ndent [2] - 87:1, 185:12 supervise [2] - 46:7, 46:11 Superviso r [1] - 220:21 supplied [2] - 57:24, 244:6 supply [2] - 110:15,	207:21 support [12] - 10:18, 14:12, 41:2, 51:3, 55:2, 63:6, 72:4, 81:8, 93:6, 138:14, 258:9, 259:16 supportin g [1] - 231:8 supposed [3] - 54:17, 64:16, 266:15 surprise [1] - 96:3 surprised [3] - 95:5, 118:11, 181:12 surroundi ng [1] - 107:2 sustained [4] - 26:13, 129:25, 261:22, 261:25 swearing [1] - 4:18 sworn [3] - 15:3, 77:2, 219:19 system [26] - 19:19, 19:23, 20:13, 20:24, 22:17, 41:18, 41:19, 46:15, 48:6, 48:11, 62:1, 67:17, 67:18, 73:20, 222:7, 227:4, 229:6, 229:10, 229:13, 238:24, 255:7,	258:15, 258:20, 259:8, 259:17, 264:21 System [3] - 220:24, 226:15, 226:16 systems [1] - 41:12 T Tab [9] - 22:25, 89:15, 95:13, 102:20, 103:2, 103:3, 132:5, 139:20 tab [3] - 89:16, 231:17, 232:23 Table [2] - 159:15, 159:19 Talent [2] - 16:5, 40:11 talks [2] - 208:6, 208:15 Tamara [2] - 70:17 Tammy [1] - 70:17 tapping [1] - 241:11 target [2] - 33:22, 268:10 targeted [6] - 27:7, 34:7, 99:6, 120:20, 168:2, 244:7 tasked [1] - 223:15 taught [3] - 40:22, 249:7, 259:15 teacher [3] - 30:15, 44:18, 196:14 Teacher [1] - 235:4	teachers [8] - 42:19, 72:3, 83:23, 214:9, 222:2, 244:6, 268:9 teachers' [1] - 241:13 teaching [1] - 220:19 team [1] - 168:10 Team [31] - 30:11, 30:16, 35:23, 35:24, 44:20, 82:22, 83:9, 96:19, 108:1, 129:17, 141:5, 142:3, 142:7, 142:8, 168:9, 168:10, 171:12, 171:15, 183:22, 201:7, 212:22, 214:22, 232:11, 233:16, 234:12, 234:14, 234:15, 234:17, 235:9, 235:19, 240:4 Technical [1] - 234:2 technical [4] - 30:5, 68:10, 228:8 technicall y [1] - 194:2 telegraphi ng [1] - 266:5 ten [3] - 113:2, 126:25, 133:21	ten-year [1] - 113:2 Term [6] - 126:2, 126:9, 131:21, 131:23, 133:17, 263:15 term [15] - 63:22, 114:23, 122:16, 122:18, 122:21, 147:6, 182:14, 182:16, 182:18, 187:2, 196:19, 210:21, 210:23, 228:8 terms [73] - 26:7, 37:10, 37:18, 38:19, 41:8, 41:21, 43:10, 44:5, 46:14, 50:17, 54:3, 54:21, 56:10, 63:11, 64:2, 64:22, 64:23, 68:15, 70:12, 101:18, 101:21, 110:1, 122:14, 122:22, 123:8, 123:12, 123:25, 124:1, 125:8, 128:6, 128:7, 150:1, 151:18, 152:8, 154:2, 154:10, 158:12, 160:20, 161:10,
--	---	--	---	---	---	--	--	--

162:1, 166:7, 173:24, 174:8, 182:13, 187:7, 189:10, 189:14, 189:21, 189:25, 191:5, 193:7, 201:7, 202:15, 208:17, 211:22, 212:25, 215:10, 221:24, 223:22, 223:23, 226:22, 230:20, 231:8, 232:19, 236:17, 240:12, 240:14, 240:19, 243:21, 251:16, 253:8, 257:13, 265:9	268:5 Test [4] - 98:12, 105:16, 210:13, 234:24 tested [8] - 60:5, 170:7, 170:12, 229:5, 229:13, 229:14, 248:25, 251:25 testified [17] - 15:4, 36:7, 37:14, 51:10, 72:10, 75:16, 77:3, 141:14, 146:23, 174:21, 177:16, 185:23, 192:25, 204:15, 212:22, 219:20, 265:16 testify [1] - 9:23 testifying [9] - 4:19, 12:1, 50:4, 55:25, 93:11, 180:5, 188:22, 210:2, 210:5 testimonie s [1] - 226:24 testimony [23] - 3:21, 3:25, 4:10, 5:17, 9:23, 9:25, 10:15, 35:2, 35:14, 53:7, 70:20, 95:17, 124:4, 141:12, 151:2,	164:24, 165:11, 217:24, 252:16, 267:1, 268:20, 268:24 Testing [2] - 238:24, 239:18 testing [12] - 61:2, 66:1, 66:7, 71:24, 72:2, 125:21, 204:4, 225:21, 239:5, 241:24, 268:3 tests [12] - 29:22, 73:2, 171:1, 209:7, 209:24, 239:10, 244:3, 247:1, 247:22, 250:20, 250:24, 268:5 text [1] - 32:10 THE [28] - 15:12, 17:3, 22:4, 30:24, 31:3, 43:7, 71:11, 75:20, 93:18, 102:25, 118:8, 127:21, 127:24, 130:19, 130:24, 131:8, 151:4, 157:4, 162:12, 219:8, 221:12, 221:15, 261:23, 264:1, 267:25, 269:4,	269:10, 269:21 thematic [1] - 88:19 themselve s [5] - 12:7, 44:20, 60:22, 60:23, 110:24 theoretical ly [1] - 193:22 theory [2] - 168:12, 266:6 thereafter [1] - 76:5 Therefore [1] - 157:12 therefore [5] - 5:5, 9:6, 28:23, 73:23, 245:18 thereof [3] - 7:17, 35:7, 53:24 they've [3] - 30:8, 51:7, 192:23 thinking [5] - 13:12, 13:13, 85:15, 209:21, 246:14 third [3] - 27:1, 194:3, 214:7 Thomas [4] - 160:12, 161:4, 164:5, 164:15 threat [1] - 128:10 threats [1] - 128:20 three [22] - 25:21, 26:10, 26:19, 65:19, 66:11, 80:16, 119:18, 122:23,	161:14, 162:18, 183:6, 237:12, 241:17, 244:4, 247:14, 251:25, 256:12, 260:21, 262:5, 262:13, 267:10, 268:18 three-day [1] - 237:12 three-year [1] - 119:18 threshold [2] - 200:20, 200:21 throughou t [7] - 58:15, 79:15, 82:4, 119:1, 128:25, 149:24, 163:3 thrown [1] - 266:6 thumb [1] - 19:15 Thursday [2] - 1:5, 237:10 ticket [2] - 251:1, 251:2 tiered [1] - 258:15 tiers [3] - 256:12, 262:5 TIME [1] - 1:5 timeline [1] - 191:22 timely [2] - 247:6, 249:17 timing [2] - 154:15, 241:2 Title [1] - 125:23 title [7] - 16:7, 25:17, 38:12,	39:25, 44:12, 45:17, 234:24 titles [1] - 16:4 today [33] - 4:25, 9:16, 9:23, 48:13, 50:4, 50:12, 50:18, 51:3, 51:4, 52:25, 54:20, 55:25, 56:8, 57:12, 61:13, 61:15, 63:6, 80:16, 86:17, 88:11, 91:21, 95:17, 111:25, 164:24, 167:21, 170:11, 191:19, 192:22, 208:10, 213:15, 219:10, 237:9, 267:1 today's [1] - 4:21 together [7] - 4:23, 50:1, 140:18, 142:6, 180:1, 217:9, 241:5 tomorrow [2] - 269:18, 269:23 took [21] - 21:7, 21:13, 59:10, 59:17, 59:18, 62:11, 62:14, 62:18, 72:19,	73:7, 87:21, 150:4, 150:21, 157:15, 178:21, 208:1, 232:1, 232:8, 249:9, 249:13, 261:8 tool [5] - 27:4, 226:4, 227:12, 251:19, 261:18 Tools [1] - 247:17 tools [2] - 34:5, 247:22 top [12] - 25:10, 27:11, 54:11, 63:14, 97:5, 126:16, 136:9, 143:12, 216:21, 247:16, 255:18, 260:23 total [6] - 41:24, 69:11, 69:17, 130:21, 195:13, 198:1 totality [2] - 65:17, 177:18 totally [4] - 164:23, 238:25, 265:3 tough [2] - 257:13 tour [2] - 144:17, 188:8 toward [1] - 179:17 towards [3] - 22:12, 179:25, 223:23 Township [2] - 221:12,	224:18 track [3] - 163:2, 213:12, 225:11 tracking [1] - 147:1 training [2] - 79:11, 83:7 trajectory [2] - 91:24, 203:7 tranche [3] - 193:21, 194:9, 199:25 tranches [1] - 199:24 transactio n [6] - 149:4, 149:22, 150:14, 150:16, 150:18, 150:24 transcribe d [3] - 22:18, 32:5, 50:23 transcribi ng [4] - 4:18, 20:25, 21:1, 21:3 transcript [19] - 18:24, 19:18, 21:6, 21:25, 32:5, 45:18, 46:21, 47:21, 48:7, 48:10, 48:25, 50:7, 74:25, 75:6, 76:4, 167:12, 204:23, 224:25, 271:7 transcript s [29] - 19:2, 19:22, 20:3,	20:8, 20:10, 20:14, 22:7, 22:10, 30:7, 30:18, 32:1, 41:13, 46:22, 46:24, 49:21, 49:22, 50:11, 50:18, 50:21, 50:24, 51:5, 75:15, 198:18, 198:21, 224:21, 226:24, 247:9, 250:6 transfere d [2] - 22:20, 22:21 transferrin g [1] - 230:20 transition [3] - 104:12, 104:22, 147:24 transitiõe d [3] - 18:13, 18:15, 38:7 translating [1] - 20:23 translation [1] - 21:1 transpare nt [3] - 101:17, 111:3, 138:20 Treasurer [1] - 160:13 tremendo us [1] - 83:20 tremendo usly [1] - 266:18 tried [6] - 32:25, 112:19, 112:20,
---	--	--	---	--	---	---	---	---

140:8, 239:10, 258:25 tries [2] - 206:24, 226:5 trigger [3] - 75:12, 245:25, 246:8 trouble [1] - 178:19 truancy [5] - 112:15, 116:11, 193:20, 193:24, 196:22 truant [2] - 84:17, 217:22 truants [2] - 172:1, 200:8 true [8] - 33:7, 122:9, 203:11, 252:24, 253:19, 254:11, 261:11 truly [1] - 240:3 trump [1] - 206:22 trust [1] - 207:9 Trustees [8] - 127:19, 136:16, 136:19, 136:20, 159:23, 160:22, 175:10, 186:2 trusting [1] - 53:14 truth [9] - 111:25, 113:20, 170:13, 171:22, 178:20, 181:13, 184:15, 185:5, 214:16 try [22] - 5:1, 85:1, 86:20, 89:7,	90:13, 93:13, 101:17, 101:23, 102:11, 109:17, 111:2, 112:5, 124:15, 154:15, 202:23, 203:13, 203:14, 203:15, 205:17, 232:12, 256:22, 266:19 trying [10] - 31:16, 91:4, 104:8, 106:8, 107:3, 112:9, 112:10, 124:9, 228:18, 267:17 turn [49] - 5:13, 25:9, 31:22, 48:15, 49:5, 51:11, 56:19, 66:20, 89:10, 89:15, 94:8, 94:10, 96:22, 99:23, 102:8, 102:20, 105:3, 107:8, 111:7, 119:24, 121:13, 136:4, 137:16, 143:4, 156:16, 158:19, 159:18, 159:25, 166:13, 181:20, 189:18, 194:21, 205:23, 210:13,	212:19, 213:17, 214:25, 218:12, 231:13, 233:8, 237:23, 239:21, 241:14, 252:1, 257:11, 260:22, 262:9, 262:25, 263:3 turned [1] - 84:20 turns [2] - 84:16, 264:10 tweaked [2] - 232:21, 233:22 tweaks [1] - 241:7 twice [3] - 58:23, 81:7, 251:25 two [53] - 3:14, 9:17, 11:10, 11:21, 12:23, 22:13, 23:12, 37:7, 52:23, 53:5, 53:24, 57:20, 60:7, 67:23, 75:21, 84:10, 87:14, 88:17, 90:21, 100:9, 115:24, 117:18, 119:5, 130:18, 134:9, 136:13, 136:21, 136:23, 137:10, 137:21, 138:18, 155:14, 164:7, 169:5,	171:13, 171:14, 172:23, 198:13, 204:19, 204:20, 204:21, 205:11, 213:25, 220:25, 227:5, 232:3, 241:24, 243:11, 246:12, 249:22, 251:9, 258:8, 258:11 two-page [1] - 172:23 two-year [5] - 84:10, 90:21, 169:5, 171:13, 258:11 type [12] - 5:14, 5:18, 17:22, 42:13, 43:23, 107:19, 236:2, 241:10, 251:24, 258:15, 259:21, 266:19 Type [1] - 22:13 types [2] - 249:20, 258:4 typical [2] - 224:18, 228:2 U ultimately [2] - 89:6, 126:2 Um-hum [1] - 263:10 um-hum [7] - 116:21, 139:9, 215:8, 237:24, 247:18, 257:17,	263:1 unachieva ble [3] - 127:6, 128:1, 129:5 Under [1] - 143:13 under [26] - 6:10, 10:5, 31:6, 97:7, 97:19, 110:24, 112:11, 125:21, 128:9, 128:19, 136:9, 143:15, 157:13, 166:16, 186:16, 190:18, 215:6, 215:10, 215:11, 235:5, 238:4, 239:25, 240:21, 241:20, 255:2 understan dings [1] - 8:5 understoo d [9] - 10:10, 23:10, 38:14, 107:23, 133:3, 183:22, 183:23, 204:16, 217:10 undo [1] - 267:4 unequivoc ally [1] - 120:16 unfair [1] - 255:23 unfortunat ely [2] - 101:16, 226:21 uniform [1] - 268:8 unilaterall y [1] -	181:15 unique [1] - 11:21 United [1] - 81:8 universal [1] - 227:16 universe [1] - 121:11 University [5] - 40:20, 78:12, 164:4, 165:24 unless [5] - 6:15, 12:16, 111:15, 168:11, 246:3 unlikely [3] - 200:24, 228:10, 228:15 unnecess ary [1] - 123:25 unrealistic [2] - 123:25, 128:1 unreasona ble [1] - 261:13 up [54] - 3:11, 10:5, 10:8, 31:15, 35:2, 40:7, 43:5, 63:22, 72:15, 74:2, 80:1, 82:5, 82:7, 83:15, 84:4, 89:11, 96:12, 102:8, 109:20, 109:21, 109:24, 114:23, 120:15, 143:20, 144:14, 145:5, 150:15,	151:6, 184:10, 188:15, 222:1, 226:12, 226:14, 227:2, 227:18, 228:13, 229:15, 236:25, 238:16, 242:6, 242:9, 243:13, 245:24, 246:4, 246:5, 249:21, 250:11, 258:6, 260:9, 264:12, 264:15, 265:23, 268:10 update [1] - 232:6 upload [1] - 230:21 uploaded [3] - 226:17, 230:18, 250:18 ups [1] - 251:24 uptake [1] - 101:21 Urban [1] - 40:19 useful [5] - 179:23, 208:24, 209:12, 229:17, 251:19 utilization [1] - 135:24 utilize [3] - 33:17, 236:8, 260:7 utilized [3] - 25:24, 30:7, 258:16 utilizing [1] - 135:21 V validate [1]	- 144:24 validity [1] - 249:1 Valley [1] - 1:14 value [2] - 209:10, 227:4 Value [1] - 220:24 values [1] - 251:7 variation [1] - 255:15 variety [3] - 17:11, 17:20, 20:19 various [8] - 12:2, 13:2, 26:16, 122:3, 128:25, 180:9, 192:8, 262:5 vast [4] - 26:17, 28:8, 60:6, 62:16 verified [1] - 255:21 verify [5] - 50:12, 50:19, 175:24, 176:1, 203:3 verifying [1] - 204:9 version [3] - 131:11, 240:6, 240:9 versus [5] - 32:7, 61:14, 62:6, 184:19, 243:21 vertical [1] - 64:22 via [2] - 109:4, 192:17 Vice [3] - 164:10, 164:18, 235:5 Vice-	President [2] - 164:10, 164:18 victim [1] - 194:13 view [9] - 81:15, 108:22, 134:4, 134:10, 181:7, 200:19, 256:21, 256:23, 265:12 viewed [2] - 181:1, 198:18 violating [1] - 187:25 violation [1] - 70:1 virtually [8] - 28:23, 73:18, 75:3, 92:12, 150:22, 194:1, 236:22, 247:11 vis [2] - 42:7 vis-a-vis [1] - 42:7 vision [10] - 84:8, 84:10, 86:4, 90:3, 90:7, 93:22, 103:22, 148:12, 167:8, 172:25 visited [1] - 222:8 visual [1] - 66:18 VOLUME [1] - 1:1 voluminou s [1] - 90:5 vote [6] - 87:24, 88:5, 88:7, 89:1, 92:23, 178:22 voted [3] - 87:25,
--	--	--	--	--	---	---	--	---

92:25, 94:6 votes [1] - 88:1	weeks [2] - 87:14, 211:5 weighted [2] - 67:17, 67:18 west [1] - 258:25 whatnot [1] - 161:19 whatsoever r [1] - 245:2 white [3] - 32:10, 32:23, 89:11 whole [8] - 14:6, 104:4, 223:20, 230:2, 235:7, 236:11, 253:24, 255:10 wide [1] - 255:15 wider [1] - 29:19 willing [3] - 122:5, 122:12, 167:23 window [3] - 61:2, 236:25, 242:1 winter [8] - 239:5, 241:21, 241:23, 241:25, 242:11, 243:16, 244:16, 244:20 wise [1] - 117:21 wish [4] - 146:2, 227:11, 231:4, 231:11 withdraw [2] - 172:7, 179:15 Witness [39] - 19:10, 22:23, 27:10, 48:16, 49:6,	51:12, 53:16, 66:22, 89:17, 94:9, 95:16, 105:6, 120:1, 121:16, 123:15, 125:13, 130:14, 132:9, 143:6, 156:18, 157:2, 157:9, 158:21, 160:2, 174:19, 178:8, 181:22, 208:20, 213:19, 215:2, 215:4, 218:17, 231:18, 233:10, 237:25, 241:15, 247:19, 252:4, 257:16 WITNESS [28] - 2:3, 17:3, 22:4, 30:24, 31:3, 43:7, 71:11, 75:20, 93:18, 102:25, 118:8, 127:21, 127:24, 130:19, 130:24, 131:8, 151:4, 157:4, 162:12, 219:8, 221:12, 221:15, 261:23, 264:1, 267:25, 269:4, 269:10, 269:21 witness	[26] - 8:7, 12:3, 14:24, 15:3, 15:11, 31:16, 76:12, 76:19, 76:23, 77:2, 94:11, 99:24, 107:9, 119:10, 124:22, 124:24, 127:12, 131:16, 136:7, 139:10, 166:14, 219:10, 219:19, 260:24, 263:2, 263:6 witnesses [6] - 3:21, 3:24, 4:19, 9:23, 10:13, 11:25 word [3] - 177:4, 257:4 word-for- word [1] - 177:4 words [16] - 24:20, 34:25, 35:5, 60:8, 74:21, 109:22, 115:14, 157:22, 167:13, 168:12, 169:18, 186:17, 191:9, 193:21, 202:21, 202:22 work-force [1] - 17:13 workers [3] - 108:9, 264:14 workforce [5] - 79:12, 80:6,	82:20, 83:3, 83:12 works [3] - 164:3, 223:2, 251:4 worksheet s [1] - 56:5 World [1] - 258:12 world [1] - 246:2 worldwide [1] - 81:4 worried [2] - 88:20, 187:16 worst [1] - 203:9 wow [1] - 19:24 write [1] - 23:22 writing [7] - 16:8, 17:22, 25:21, 35:10, 36:2, 98:10, 188:18 written [8] - 27:20, 35:9, 66:19, 88:2, 90:25, 133:19, 227:11, 232:18 wrote [3] - 53:14, 106:1, 178:1	29:4, 29:6, 29:18, 30:9, 32:8, 32:13, 34:4, 38:3, 38:22, 38:23, 38:25, 39:7, 40:11, 43:12, 43:16, 45:19, 48:22, 49:11, 49:18, 51:21, 52:2, 52:18, 53:9, 53:12, 54:7, 54:13, 54:14, 54:22, 56:21, 57:4, 60:12, 60:17, 61:12, 62:3, 62:12, 62:19, 66:16, 68:22, 68:24, 69:2, 69:9, 69:12, 76:8, 80:17, 81:12, 82:4, 84:10, 90:21, 97:12, 98:6, 98:15, 98:17, 98:19, 98:20, 98:21, 98:23, 98:25, 99:7, 108:9, 108:10, 108:11, 111:13, 111:23, 113:2,	113:5, 117:15, 119:18, 121:25, 122:2, 122:17, 122:18, 126:8, 126:18, 126:23, 126:25, 133:17, 133:21, 133:22, 134:1, 135:8, 140:10, 142:4, 149:24, 151:11, 163:1, 169:5, 171:13, 171:17, 179:24, 184:23, 185:1, 190:12, 193:25, 199:14, 199:15, 200:6, 200:10, 203:22, 203:25, 210:18, 212:25, 213:1, 213:3, 213:5, 214:6, 214:7, 214:8, 215:24, 216:16, 216:18, 216:23, 217:3, 220:16, 228:20, 228:21, 228:22, 229:5, 229:13, 230:21, 230:22, 237:8, 238:16, 238:18, 238:21, 239:7, 239:12, 239:13, 239:15,	239:18, 240:15, 240:18, 241:5, 241:7, 241:25, 242:14, 253:16, 254:5, 255:3, 255:4, 255:21, 257:22, 258:11, 258:12, 258:22, 260:18, 260:19, 261:9, 262:12, 262:22, 263:14, 264:21, 269:9 Year [4] - 180:17, 180:18, 180:19, 180:22 year's [2] - 232:4, 262:18 year-long [1] - 179:24 Yearly [1] - 255:2 years [37] - 15:25, 16:10, 23:12, 26:10, 26:19, 36:9, 52:23, 53:5, 53:24, 53:25, 57:20, 78:20, 115:3, 115:24, 119:5, 119:17, 126:15, 142:14, 154:1, 171:14, 172:1, 184:21, 193:18, 204:19, 204:20, 204:21,	205:4, 205:11, 220:20, 220:23, 222:8, 226:3, 236:7, 253:4, 258:8, 267:10, 267:20 yesterday [4] - 9:15, 11:7, 237:10, 237:12 York [1] - 225:3 younger [4] - 93:5, 116:15, 118:17, 119:20 yourself [1] - 161:4 youth [2] - 104:1, 104:11 Yvonne [1] - 175:3
								Z
								zero [4] - 63:17, 63:18, 154:9, 218:3 zoning [3] - 150:5, 188:14, 188:16