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IN THE UNITED STATES BANKRUPTCY COURT

FOR THE EASTERN DISTRICT OF CALIFORNIA, SACRAMENTO DIVISION

HIGHLANDS COMMUNITY CHARTER AND TECHNICAL SCHOOLS, Debtor and Debtor in Possession.	Case No. 26-25868 Chapter 11 Adv No. 26-02134
HIGHLANDS COMMUNITY CHARTER AND TECHNICAL SCHOOLS, Plaintiff, **v.** **TWIN RIVERS UNIFIED SCHOOL DISTRICT BOARD OF TRUSTEES; CALIFORNIA STATE BOARD OF EDUCATION,** Defendants.	**DEFENDANT CALIFORNIA STATE BOARD OF EDUCATION'S REQUEST FOR JUDICIAL NOTICE IN SUPPORT OF OPPOSITION TO MOTION FOR ORDER EXTENDING STAY TO THE REVOCATION APPEAL** Hearing: November 10, 2026 Time: 11:00 a.m. Place: 32 Judge The Honorable Christopher D. Jaime

INTRODUCTION

Defendant State Board of Education (SBE) in the above-captioned adversary proceeding hereby requests that the Court take judicial notice of Exhibits A through Q, pursuant to Rule 201 of the Federal Rules of Evidence, in support of SBE's Opposition to plaintiff Highlands Community Charter and Technical Schools' Motion for Order Extending the Stay to the

Revocation Appeal Under Bankruptcy Code Sections 105(a) and 362 and for all other permissible purposes.

DISCUSSION

Federal Rule of Bankruptcy Procedure 9017 provides that the Federal Rules of Evidence shall apply in cases under the Federal Bankruptcy Code. Federal Rule of Evidence 201 provides that a court may take judicial notice of "a fact not subject to reasonable dispute because it . . . can be accurately and readily determined from sources whose accuracy cannot be reasonably questioned." The Court "must take judicial notice if a party requests it and the court is supplied with the necessary information." Fed. R. Evid. 201(c).

Exhibits A through Q consist of public documents of various governmental agencies related to Debtor and Plaintiff Highlands Community Charter and Technical Schools (Debtor) and the Revocation Appeal. This information is relevant because it shows that the Revocation Appeal does not deal with any pecuniary interest, and is directly relevant to SBE's argument that the police and regulatory power exception and the state educational licensure exception to the automatic stay apply to the Revocation Appeal. These documents are also relevant to SBE's arguments opposing Debtor's request for a discretionary stay.

1. Highlands Community Charter Schools (HCCS) Notice of Violation, dated June 12, 2025, located at https://simbli.eboardsolutions.com/SB_Meetings/ViewMeeting.aspx?S=36030476&MID=54735&Tab=Minutes, a true and correct copy of which is attached to the accompanying Exhibit List as Exhibit A.
2. California Innovative Career Academy (CICA) Notice of Violation, dated June 12, 2025, located at https://simbli.eboardsolutions.com/SB_Meetings/ViewMeeting.aspx?S=36030476&MID=54735&Tab=Minutes, a true and correct copy of which is attached to the accompanying Exhibit List as Exhibit B.
3. California Department of Education's ACCS Meeting Agenda Notice, dated September 25, 2026, and SBE Policy 01-04 re: ACCS, dated April 2002, located at

https://www.cde.ca.gov/be/cc/cs/documents/charterschools.pdf, a true and correct copy of which is attached to the accompanying Exhibit List as Exhibit C.

4. Outreach and Technical Assistance Network, California AE Provider Directory, located at https://otan.us/Resources/Home/ProviderDirectory, a true and correct copy of which is attached to the accompanying Exhibit List as Exhibit D.

5. Capital Adult Education, Adult Education Career & Workforce Preparation Fall 2025, located at https://www.capitaladulted.org/Content/Downloads/pdf/2025/Career%20&%20Workforce%20Infographic%20Fall%202025%20-%20Final.pdf, a true and correct copy of which is attached to the accompanying Exhibits List as Exhibit E.

6. School Sites – John Muir Charter Schools, located at https://johnmuircs.com/school-sites/?filter-location=101#, a true and correct copy of which is attached to the accompanying Exhibit List as Exhibit F.

7. HCCS' Response to Notice of Violation, dated September 26, 2025, located at https://simbli.eboardsolutions.com/Meetings/Attachment.aspx?S=36030476&AID=1387823&MID=54735, a true and correct copy of which is attached to the accompanying Exhibit List as Exhibit G.

8. CICA's Response to Notice of Violation, dated September 26, 2025, located at https://simbli.eboardsolutions.com/Meetings/Attachment.aspx?S=36030476&AID=1387846&MID=54735, a true and correct copy of which is attached to the accompanying Exhibit List as Exhibit H.

9. HCCS Notice of Intent to Revoke, dated November 5, 2025, located at https://simbli.eboardsolutions.com/Meetings/Attachment.aspx?S=36030476&AID=1387822&MID=54735, a true and correct copy of which is attached to the accompanying Exhibit List as Exhibit I.

10. CICA Notice of Intent to Revoke, dated November 5, 2025, located at https://simbli.eboardsolutions.com/Meetings/Attachment.aspx?S=36030476&AID=1387845&MID=54735, a true and correct copy of which is attached to the accompanying

Exhibit List as Exhibit J.

11. Twin Rivers Unified School District Special and Virtual School Board Meeting Minutes dated January 30, 2026, located at https://simbli.eboardsolutions.com/SB_Meetings/ViewMeeting.aspx?S=36030476&MID=54735&Tab=Minutes, a true and correct copy of which is attached to the accompanying Exhibit List as Exhibit K.
12. Sacramento County Board of Education (SCBOE) Board Agenda, dated May 19, 2026, located at https://scoe.community.highbond.com/Portal/MeetingInformation.aspx?Id=407, a true and correct copy of which is attached to the accompanying Exhibit List as Exhibit L.
13. SCBOE May 19, 2026 Board Minutes, located at https://scoe.community.highbond.com/Portal/MeetingInformation.aspx?Id=407, a true and correct copy of which is attached to the accompanying Exhibit List as Exhibit M.
14. Advisory Commission on Charter Schools Meeting Agenda, dated October 6, 2026, located at https://www.cde.ca.gov/be/cc/cs/accsnotice100626.asp, a true and correct copy of which is attached to the accompanying Exhibit List as Exhibit N.
15. Twin Rivers Unified School District Regular and Virtual School Board Meeting Minutes, dated June 16, 2026, located at https://simbli.eboardsolutions.com/SB_Meetings/ViewMeeting.aspx?S=36030476&MID=68365&Tab=Agenda&enIID=kgEYplusYbfFpjQ3w3vLMNX8w%3D%3D, a true and correct copy of which is attached to the accompanying Exhibit List as Exhibit O.
16. HCCS Notice of Violation, dated August 6, 2026, located at https://simbli.eboardsolutions.com/Meetings/Attachment.aspx?S=36030476&AID=1643509&MID=76004, a true and correct copy of which is attached to the accompanying Exhibit List as Exhibit P.
17. CICA Notice of Violation, dated August 6, 2026, located at https://simbli.eboardsolutions.com/Meetings/Attachment.aspx?S=36030476&AID=1643572&MID=76004, a true and correct copy of which is attached to the accompanying

Exhibit List as Exhibit Q.

Based on the foregoing, SBE respectfully requests that the Court take judicial notice of Exhibits A through Q.

Dated: October 27, 2026

Respectfully submitted,

ROB BONTA
Attorney General of California
ANJANA N. GUNN
Supervising Deputy Attorney General



COLIN D. SCHOELL
Deputy Attorney General
Attorneys for Defendant
State Board of Education

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Exhibit A

Board of Trustees

Basim Elkarra
President

Stacey Bastian
Vice President

Christine Jefferson
Clerk

Michael Baker
Member

Sharon Reichelt
Member

Rebecca Sandoval
Member

Sascha Vogt
Member

Superintendent
Steve Martinez, Ed.D.

To inspire each student to extraordinary achievement every day

June 12, 2025

VIA OVERNIGHT DELIVERY AND EMAIL (without exhibits)

Bill McGuire, Executive Director
Highlands Community Charter and Technical Schools
1333 Grand Ave.
Sacramento, CA 95838
bill.mcguire@hccts.org

Highlands Community Charter and Technical Schools Board of Directors:
Ernie Daniels - erniedaniels7@gmail.com
Sharon Rocco - silvr01@yahoo.com
Matt Powers - powersmatt@comcast.net
Sonja Cameron - scameron1945@gmail.com
Rick Jones - captainrick513@gmail.com
Mary DeChance - mary.dechance@hccts.org
Mike Reid - mike.reid@hccts.org

RE: Notice of Violation Pursuant to Education Code Section 47607
Highlands Community Charter School

Dear HCCTS Board of Directors and Mr. McGuire:

With this letter, the Twin Rivers Unified School District ("District") Board of Trustees ("Board"), the authorizer for Highlands Community Charter School ("HCCS" or "Charter School"), is providing this Notice of Violation and a reasonable opportunity to remedy the violations stated herein, pursuant to Education Code section 47607 and Title 5, sections 11965 et. seq. of the California Code of Regulations.

In accordance with Title 5, section 11968.5.2(a) and (b), of the California Code of Regulations ("Section 11968.5.2"), the District provides this Notice of Violation to the Charter School's governing body at least seventy-two (72) hours prior to the District's **June 17, 2025**, Board Meeting during which the District's Board of Trustees will consider whether to issue this Notice in accordance with applicable law. In conformity with Section 11968.5.2(a), the Charter School is hereby provided with notice of the following proposed action by the Board:

> **PLEASE TAKE NOTICE** that at or about **6:00 p.m.** on **June 17, 2025**, the Twin Rivers Unified School District Board of Trustees will hold a board meeting at the District Office, 5115 Dudley Blvd., McClelland Park, California, and consider whether to issue this Notice of Violation under Education Code Section 47607, based upon HCCS' material violations of the conditions, standards, or procedures of its Charter; failure to meet generally accepted accounting principles, or engaged in fiscal mismanagement; and violations of law.

All relevant documents related to the proposed action to issue the Notice of Violation are attached as Exhibits. HCCS is in material violation of the conditions, standards, and procedures set forth in its Charter, has failed to meet generally accepted accounting principles, or engaged in fiscal mismanagement, and is in violation of the law as further described below.

I. BACKGROUND

The Board initially approved the petition for the establishment of HCCS in 2014 for a term running through June 30, 2019. On or about March 5, 2019, the Board conditionally approved the petition to renew HCCS' Charter for a five-year term from July 1, 2019, through June 30, 2024 ("Charter").[1] HCCS is operated and governed independently by Highlands Community Charter and Technical Schools ("HCCTS"), a California nonprofit public benefit corporation, and its Board of Directors.

The District and the Charter School also entered into a Memorandum of Understanding ("MOU") on or about May 19, 2019, to document the arrangement and agreement between the parties regarding HCCS' program, operation, structure, and obligations. Subsequent amendments to the MOU approved by the Board extended its term through June 30, 2027. On or about January 23, 2024, the District and HCCS subsequently agreed to Amendment No. 3 of the MOU ("MOU Amendment No. 3") which, among other things, confirmed the District's authorization of specified locations HCCS had established for charter school operations and made other clarifications regarding the process for approval of any new facility locations, facility safety expectations, and supervisorial oversight.

MOU Amendment No. 3 provides in part:

> "The terms of the MOU are intended by the District and Charter School to become part of the standards and procedures set forth in the Charter School's Charter approved by the District ("Charter"). Along with the Charter, this MOU will govern the relationship between the District and the Charter School regarding the operation of the Charter School. To the extent the terms of the MOU is/are inconsistent with any terms of the Charter, the MOU shall control. In addition, if the Charter is silent on an issue addressed by the MOU, the MOU shall control. As such, any violation of MOU by Charter School that also constitutes grounds for revocation per Education Code section 47607 will be treated and enforced by the District in the same manner, subject to Education

[1] Pursuant to Education Code section 47607.4 (enacted by SB 114), "all charter schools whose term expires on or between January 1, 2022, and June 30, 2025, inclusive, shall have their term extended by two years, and all charter schools whose term expires on or between January 1, 2024, and June 30, 2027, inclusive, shall have their term extended by one additional year." Therefore, HCCS' Charter was automatically extended by three additional years by operation of law and currently expires June 30, 2027.

> Code Section 47607 and applicable implementing regulations, as it would any other violation constituting a ground for revocation." [2] (Emphasis added.)

As the charter authorizer, the District is responsible for overseeing HCCS pursuant to the Education Code. This oversight responsibility is in place to ensure HCCS is operating in compliance with the conditions, standards, or procedures set forth in its Charter, meeting legal requirements of law, meeting and/or pursuing the pupil outcomes identified in its charter, and engaging in sound fiscal practices. (Ed. Code, § 47607(f).) Specifically, Education Code section 47607(f) provides the following:

> A charter may be revoked by the chartering authority if the chartering authority finds, through a showing of substantial evidence, that the charter school did any of the following:
>
> (1) Committed a material violation of any of the conditions, standards, or procedures set forth in the charter.
> (2) Failed to meet or pursue any of the pupil outcomes identified in the charter.
> (3) Failed to meet generally accepted accounting principles or engaged in fiscal mismanagement.
> (4) Violated any law.

This Notice of Violation ("Notice") sets forth:

(1) The Charter School's alleged specific material violations of a condition, standard, or procedure set out in the Charter School's Charter pursuant to Education Code section 47607(f)(1); the Charter School's alleged fiscal mismanagement or specific failure to follow generally accepted accounting principles pursuant to Education Code section 47607(f)(3); and the specific provisions of law that the Charter School allegedly failed to follow pursuant to Education Code section 47607(f)(4), in conformity with Title 5, section 11965(f) of the California Code of Regulations;

(2) All evidence relied upon by the chartering authority in determining the Charter School engaged in any of the acts or omissions identified in Section 47607(f)(1) including the date and duration of the alleged violation(s), showing the violations is/are both material and uncured, and that the alleged violations occurred within a reasonable period of time before a notice of violation is issued; and

(3) The period of time that the chartering authority has concluded is a reasonable period of time for the Charter School to remedy or refute the identified violations. In identifying the time period that will serve as the charter school's reasonable opportunity to remedy the identified violations, the District has considered the amount of time reasonably necessary to remedy each identified violation.

(Title 5, Cal. Code Regs, § 11965(f)(1)-(3).)

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[2] "Charter School" as used in the MOU Amendment No. 3 collectively refers to Highlands Community Charter and Technical Schools and Highlands Community Charter School.

Accordingly, the District hereby places HCCS on notice that should it fail to submit to the District a detailed, written response addressing each identified violation which shall include the refutation, remedial action taken, or proposed remedial action by the Charter School specific to each alleged violation, on or before **September 26, 2025**, the Board may proceed with the process for revoking HCCS' Charter.

II. VIOLATIONS OF THE CHARTER

HCCS has committed the following material violations of the conditions, standards, or procedures set forth in the Charter and the MOU:

A. Grade Level Changes

Education Code section 47604(a)(4) provides in part: "After receiving approval of its petition, a charter school that proposes to expand operations to one or more additional sites or grade levels shall request a material revision to its charter and shall notify the chartering authority of those additional locations or grade levels."

HCCS' Charter only authorizes the Charter School to provide instruction to students in grades 1, 2, and 12. However, HCCS has operated and received state apportionment for students enrolled in grades 9 and 10 without submitting a material revision request, in violation of its Charter and Education Code § 47604(a)(4).

By correspondence dated August 28, 2024, HCCTS sent a letter to the District stating that HCCS had added grade 9 and 10 through a non-material revision to its Charter based on the approval of District staff on October 29, 2020. The District sent an inquiry to HCCTS on September 30, 2025, requesting evidence to support HCCTS' statement that the District has approved the change in grades through non-material revision. The District reviewed the documentation provided by HCCTS and with correspondence dated February 3, 2025, the District informed the Charter School that it failed to notify the District before changing the approved grade levels. *(See Exhibits A and B.)*

B. Location Changes

On or about January 23, 2024, the District and HCCTS agreed to the MOU Amendment No. 3 which included a list of approved locations for HCCS' charter school operations. The MOU Amendment No. 3 includes the express requirement for HCCS to submit a written request to the District if the "Charter School seeks to establish operations at one or more additional locations(s) or move any of its existing location(s), including satellite facilities or resource centers…" HCCS' enrollment reports submitted beginning with July 2024 through March 2025 reflect students enrolled at locations that are not reflected in the current MOU Amendment No. 3.

In addition, on October 3, 2024, October 17, 2024, and November 7, 2024, the HCCTS Board of Directors approved multiple locations for HCCS operations which are not included in the list of approved locations identified in MOU Amendment No. 3. The District has sent multiple communications regarding HCCTS' addition of locations without submitting a material revision request. In a Notice of Concern and Request for Information dated April 23, 2025, the District outlined specific steps that must be taken to address discrepancies and comply with MOU Amendment No. 3. To date, no material revision request has been submitted for these locations

and HCCS continues to operate at these locations in violation of the MOU Amendment No. 3 and Education Code section 47605(a)(4). *(See Exhibits A, C, and H.)*

Additionally, HCCTS has failed to provide fully executed copies of lease agreements as requested in the District's April 23, 2025, Notice of Concern/Request for Information. As the chartering authority, the District is entitled to information and documentation regarding the Charter School's operations (Ed. Code, § 47604.3). The failure to timely provide such information interferes with the District's oversight obligations

III. VIOLATIONS OF LAW

HCCS has committed the following violations of law:

A. Failure to Submit Annual Independent Audit Report

Education Code section 47064.33(a) requires that all charter schools file certain periodic financial reports, including annual audits. Likewise, section 47064.33(b) recognizes the importance for the charting authority to rely on these and any other financial reports in carrying out its oversight duties and "monitoring the fiscal condition of [a] charter school." (Ed. Code, § 47064.33(b).) Additionally, Education Code section 47605(m) requires charter schools to, "...transmit a copy of its annual, independent financial audit report for the preceding fiscal year...to its chartering authority...by December 15 of each year." HCCTS requested an extension to the December 15, 2024, deadline for submitting its 2023-24 audit report. The District granted an extension until January 15, 2025, but HCCTS failed to meet this deadline.

On March 19, 2025, the District sent a Request for Information requiring HCCTS to submit the annual independent financial audit report no later than March 31, 2025. When HCCTS failed to comply, the District sent a Notice of Concern to HCCTS dated April 7, 2025 and outlined a requirement for HCCTS to submit the annual report by April 18, 2025. A subsequent Notice of Concern was sent to HCCTS on April 24, 2025 requiring HCCTS to submit the report by May 5, 2025. To date HCCTS' audit report has not been submitted to the District. *(See Exhibit D and H.)*

HCCS is in violation of Education Code sections 47604.33 and 47605, and its own Charter, for failing to complete and submit its 2023-24 annual independent audit report to the District. HCCS' failure to provide its annual audit report for 2023-24, hinders the District's ability to properly carry out its duties as charter authorizer to oversee the Charter School's operations and monitor its fiscal condition.

B. Credential Misassignments

Education Code section 47605(l) provides in part: "Teachers in charter schools shall hold the Commission on Teacher Credentialing certificate, permit, or other document required for the teacher's certificated assignment. These documents shall be maintained on file at the charter school and are subject to periodic inspection by the chartering authority."

HCCS has provided instruction to its students using teachers who do not hold the appropriate credential as required by the Education Code. In correspondence dated March 17, 2025, HCCTS represented that Nancy Mora, Credentials Technician from San Diego County Office of

Education ("SDCOE"), provided them with a recommendation that the Adult Education Credentials would be the appropriate credential for HCCTS teachers of record in a general education K-12 assignment. The District inquired with the California Commission on Teacher Credentialing ("CTC") and in correspondence dated March 11, 2025, received clarification confirming that the SDCOE's interpretation was incorrect: "While the credential was not designed only for providing instruction in an adult setting like the Designated Subjects Adult Education teaching credential, both the Multiple Subject and Single Subject teaching credentials authorize teaching in classes for adults in the respective classroom settings…" HCCTS failed to seek guidance from the CTC regarding credential requirements, but instead relied on faulty information from the Ms. Mora resulting in disallowed ADA. *(Exhibit E.)*

C. Failure to Track Minimum Instructional Minutes

Education Code 47612.5(e)(1) states: "For purposes of calculating average daily attendance for classroom-based instruction apportionments, at least 80 percent of the instructional time offered by the charter school shall be at the schoolsite, and the charter school shall require the attendance of all pupils for whom a classroom-based apportionment is claimed at the schoolsite for at least 80 percent of the minimum instructional time required…"

HCCS' average class sizes have far exceeded classroom capacity with averages as high as 227 students. As a result, and as observed by District representatives during site visits and noted as part of the 2024-25 Attendance Audit conducted by CFE Consultant Dennis Snelling, HCCS students were observed arriving and leaving continuously without intending to stay for instruction. It was also observed that students were routinely sent home with packets or instructed to attend only part of the instructional day due to limited classroom capacity. The District believes that these practices resulted in students receiving significantly less than 80% in-person instruction and demonstrates that the HCCS did not require attendance of all pupils. The District authorized 2024-25 Attendance Audit also noted that attendance records were discarded, thereby removing any documented evidence of student attendance, which is necessary to verify the accuracy of enrollment reported for ADA. The above demonstrates HCCS' violation of the law. *(See Exhibit E.)*

D. Violation of WIOA Exclusive Partnership Agreement

During its 2024–25 oversight review, the District discovered that HCCTS had allowed individuals who were not enrolled students to participate in its Career Technical Education (CTE) Truck Driving program. This practice violates the legal requirement that instruction be provided exclusively in partnership with Workforce Innovation and Opportunity Act (WIOA) programs. According to HCCTS, this practice began in 2014 at the direction of a Board member, was supported by the Executive Director, and continued with Board approval through the 2024–25 school year. The issue was previously raised during the 2018 FCMAT audit of HCCS. In a letter dated June 22, 2018, HCCTS asserted that Education Code sections 47612.1(a) and 47605.1 requires a charter school "provide instruction exclusively in partnership with WIOA," but does not require the charter school to "operate exclusively in partnership with" WIOA. While the District agrees with the interpretation of law as outlined by HCCTS in its letter dated June 22, 2018, the practice of providing instruction to non-students as part of HCCTS' partnership

with the Volunteers of America, Local 185 Union, Sacramento County Sheriff's Office, and the Sacramento Police Department, violates this agreement. *(See Exhibit E and H.)*

IV. FISCAL MISMANAGEMENT

HCCS has failed to meet generally accepted accounting principles, and/or engaged in fiscal mismanagement as follows:

A. San Diego Administrative Location

As approved by the HCCTS Board of Directors on or about August 4, 2022, HCCTS secured a site at 406 9th Avenue, Suite 310, San Diego, CA 92101 ("San Diego site"). HCCTS represents that the San Diego site is used for administrative purposes despite having no students in or near the area. However, public records show the location is marketed as luxury office condominiums, with Suite 310 (HCCTS' suite) advertised as having a "dedicated balcony with unparalleled view of Petco Park" and being the highest priced suite among the listed units for this address at the purchase price amount of $725,000.

This costly expenditure of a public funds on an administrative condominium located nowhere near HCCS student locations constitutes fiscal mismanagement of public funds. *(See Exhibit F and H.)*

B. Marysville 2 Location

The "Marysville 2" site at 1431 C Street, Marysville, CA ("Marysville 2"), was identified by HCCTS in both Exhibit B of the approved MOU Amendment No. 3 and a December 29, 2023, site list as a location for HCCS Career Technical Education (CTE) programs. However, during a site visit on March 4, 2024, the District's representative confirmed the site is not an instructional facility but a baseball field and no students were enrolled at the site. Further investigation by the District revealed HCCTS donated $25,000 for upgrades to the field, including $12,500 to sponsor the Marysville Drakes, a privately operated professional baseball team. This use of public funds for a private sports team raises serious concerns about misuse of educational resources.

The District issued a Notice of Concern and request for information on Mach 14, 2024 regarding the baseball field. HCCTS replied on April 5, 2024 stating that the donation was a "sponsorship" and that HCCTS received benefits which were intended to "attract new students". The District issued additional Notices of Concern/Requests for information on June 17, 2024, August 15, 2024, October 1, 2024, and February 19, 2025. HCCTS responded to these communications on July 23, 2024, September 25, 2024, January 14, 2025, and March 21, 2025. HCCTS' January 14, 2025 letters included a copy of a termination agreement between HCCTS and the City of Marysville.

Per a termination agreement HCCTS and the City of Marysville terminated the lease effective November 30, 2024. However, the termination agreement obligates HCCTS to continue paying $33,639.80 in lease payments annually through April 30, 2026. Additionally, HCCTS sold publicly funded equipment (valued at $52,494.34) to the City of Marysville for $1.00 as outlined in the November 30 termination agreement. While HCCTS potentially has the option per the

termination agreement to have the equipment returned if HCCTS leases the Marysville 2 property in the future, the option is subject to agreement by the City. The ongoing lease payments, the disposal of equipment at a nominal price, and the initial misrepresentation of the site's intended use constitutes fiscal mismanagement. *(See Exhibit G.)*

V. CONCLUSION AND REMEDY PERIOD

Please be advised that the District views HCCS' material violations of the conditions, standards, or procedures of its Charter, failure to meet generally accepted accounting principles, or engaged in fiscal mismanagement, and violations of law as grounds to issue this Notice of Violation and the District may pursue further steps towards revocation of the Charter if these violations are not remedied.

Section 11968.5.2(c) describes a charter school governing body's obligation once a Notice of Violation is received:

> Upon receipt of a Notice of Violation, the charter school's governing body, as described in the school's charter, if it chooses to respond, shall take the following actions:
>
> (1) Submit to the chartering authority a detailed, written response addressing each identified violation which shall include the refutation, remedial action taken, or proposed remedial action by the charter school specific to each alleged violation; the written response shall be due by the end of the remedy period identified in the Notice of Violation; and
>
> (2) Attach to its written response supporting evidence of the refutation, remedial action, or proposed remedial action, if any, including written reports, statements, and other appropriate documentation.

The District provides HCCTS with a reasonable remedy period of up to and including **September 26, 2025**, to provide the written response described above.

While the District appreciates and acknowledges HCCTS' responsiveness to various requests for information and notices of concern in other areas over the past twelve months, HCCTS has either failed to remedy multiple areas of concern despite its receipt of multiple information requests and notices of concern from the District or makes promises of future improvements without offering viable plans that either have been implemented or are capable of being implemented by HCCTS.

As a result and since the District views HCCS' material violations of the conditions, standards, or procedures of its Charter and MOU, failure to meet generally accepted accounting principles, or engaged in fiscal mismanagement, and violations of law as grounds for revocation, the District has determined that the point has been reached where it is necessary to initiate the first step in the formal revocation process contained in the Education Code, which is the issuance of a Notice of Violation per Education Code section 47607(g) and Title 5, Cal. Code of Regulations, section 11968.5.2.

Sincerely,

Steve Martinez, Ed. D
Superintendent

cc: Dave Gordan, Sacramento County Superintendent of Schools (dgordon@scoe.net)

Enclosures: Exhibits A-H

Exhibit B

Board of Trustees

Basim Elkarra
President

Stacey Bastian
Vice President

Christine Jefferson
Clerk

Michael Baker
Member

Sharon Reichelt
Member

Rebecca Sandoval
Member

Sascha Vogt
Member

Superintendent
Steve Martinez, Ed.D.

To inspire each student to extraordinary achievement every day

June 12, 2025

VIA OVERNIGHT DELIVERY AND E-MAIL (without exhibits)

Bill McGuire, Executive Director
Highlands Community Charter and Technical Schools
1333 Grand Ave.
Sacramento, CA 95838
bill.mcguire@hccts.org

Highlands Community Charter and Technical Schools Board of Directors:
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Matt Powers - powersmatt@comcast.net
Sonja Cameron - scameron1945@gmail.com
Rick Jones - captainrick513@gmail.com
Mary DeChance - mary.dechance@hccts.org
Mike Reid - mike.reid@hccts.org

RE: Notice of Violation Pursuant to Education Code Section 47607
California Innovative Career Academy

Dear HCCTS Board of Directors and Mr. McGuire:

With this letter, the Twin Rivers Unified School District ("District") Board of Trustees ("Board"), the authorizer for California Innovative Career Academy ("CICA" or "Charter School"), is providing this Notice of Violation and a reasonable opportunity to remedy the violations stated herein, pursuant to Education Code section 47607 and Title 5, sections 11965 et. seq. of the California Code of Regulations.

In accordance with Title 5, section 11968.5.2(a) and (b), of the California Code of Regulations ("Section 11968.5.2"), the District provides this Notice of Violation to the Charter School's governing body at least seventy-two (72) hours prior to the District's **June 17, 2025**, Board Meeting at which the District's Board of Trustees will consider whether to issue this this Notice in accordance with applicable law. In conformity with Section 11968.5.2(a), the Charter School is hereby provided with notice of the following proposed action by the Board:

PLEASE TAKE NOTICE that at or about **6:00 p.m.** on **June 17, 2025**, the Twin Rivers Unified School District Board of Trustees will hold a board meeting at the District Office, 5115 Dudley Blvd., McClelland Park, California, and consider whether to issue this Notice of Violation under Education Code Section 47607, based upon CICA's material violations of the conditions, standards, or procedures of its Charter; failure to meet generally accepted accounting principles, or engaged in fiscal mismanagement; and violations of law.

All relevant documents related to the proposed action to issue the Notice of Violation are attached as Exhibits. CICA is in material violation of the conditions, standards, and procedures set forth in its Charter, has failed to meet generally accepted accounting principles, or engaged in fiscal mismanagement, and is in violation of the law as further described below.

I. BACKGROUND

On or about June 25, 2019, the Board conditionally approved the petition for the establishment of CICA with a give-year charter a term from July 1, 2019, through June 30, 2024 ("Charter").[1] CICA is operated and governed independently by Highlands Community Charter and Technical Schools ("HCCTS"), a California nonprofit public benefit corporation, and its Board of Directors.

The District and the Charter School also entered into a Memorandum of Understanding ("MOU") on or about February 25, 2020, to document the arrangement and agreement between the parties regarding CICA's program, operation, structure, and obligations. Subsequent amendments to the MOU approved by the Board extended its term through June 30, 2027. On or about January 23, 2024, the District and CICA subsequently agreed to Amendment No. 3 of the MOU ("MOU Amendment No. 3") which, among other things, confirmed the District's authorization of specified locations CICA had established for charter school operations and made other clarifications regarding the process for approval of any new facility locations, facility safety expectations, and supervisorial oversight.

MOU Amendment No. 3 provides in part:

"The terms of the MOU are intended by the District and Charter School to become part of the standards and procedures set forth in the Charter School's Charter approved by the District ("Charter"). Along with the Charter, this MOU will govern the relationship between the District and the Charter School regarding the operation of the Charter School. To the extent the terms of the MOU is/are inconsistent with any terms of the Charter, the MOU shall control. In addition, if the Charter is silent on an issue addressed by the MOU, the MOU shall control. As such, any violation of MOU by Charter School that also constitutes grounds for revocation per Education Code section 47607 will be treated and enforced by the District in the same manner, subject to Education Code Section 47607 and

[1] Pursuant to Education Code section 47607.4 (enacted by SB 114), "all charter schools whose term expires on or between January 1, 2022, and June 30, 2025, inclusive, shall have their term extended by two years, and all charter schools whose term expires on or between January 1, 2024, and June 30, 2027, inclusive, shall have their term extended by one additional year." Therefore, CICA's Charter was automatically extended by three additional years by operation of law and currently expires June 30, 2027.

applicable implementing regulations, as it would any other violation constituting a ground for revocation." [2] (Emphasis added.)

As the charter authorizer, the District is responsible for overseeing CICA pursuant to the Education Code. This oversight responsibility is in place to ensure CICA is operating in compliance with the conditions, standards, or procedures set forth in its Charter, meeting legal requirements of law, meeting and/or pursuing the pupil outcomes identified in its charter, and engaging in sound fiscal practices. (Ed. Code, § 47607(f).)

Specifically, Education Code section 47607(f) provides the following:

> A charter may be revoked by the chartering authority if the chartering authority finds, through a showing of substantial evidence, that the charter school did any of the following:
>
> (1) Committed a material violation of any of the conditions, standards, or procedures set forth in the charter.
> (2) Failed to meet or pursue any of the pupil outcomes identified in the charter.
> (3) Failed to meet generally accepted accounting principles or engaged in fiscal mismanagement.
> (4) Violated any law.

The District has determined that CICA has materially violated the conditions, standards, and procedures of its Charter, failed to meet generally accepted accounting principles or engaged in fiscal mismanagement, and violated the law as set forth below, warranting issuance of this Notice of Violation. Relevant documents are attached to this Notice as Exhibits.

This Notice of Violation ("Notice") sets forth:

(1) The Charter School's alleged specific material violations of a condition, standard, or procedure set out in the Charter School's Charter pursuant to Education Code section 47607(f)(1); the Charter School's alleged fiscal mismanagement or specific failure to follow generally accepted accounting principles pursuant to Education Code section 47607(f)(3); and the specific provisions of law that the Charter School allegedly failed to follow pursuant to Education Code section 47607(f)(4), in conformity with Title 5, section 11965(f) of the California Code of Regulations;

(2) All evidence relied upon by the chartering authority in determining the Charter School engaged in any of the acts or omissions identified in Section 47607(f)(1) including the date and duration of the alleged violations, showing the violation(s) is/are both material and uncured, and that the alleged violation(s) occurred within a reasonable period of time before a notice of violation is issued; and

(3) The period of time that the chartering authority has concluded is a reasonable period of time for the Charter School to remedy or refute the identified violations. In identifying the time period that will serve as the charter school's reasonable

[2] "Charter School" as used in the MOU Amendment No. 3 collectively refers to Highlands Community Charter and Technical Schools and CICA.

opportunity to remedy the identified violations, the District has considered the amount of time reasonably necessary to remedy each identified violation.

(Title 5, Cal. Code Regs, § 11965(f)(1)-(3).)

Accordingly, the District hereby places HCCS on notice that should it fail to submit to the District a detailed, written response addressing each identified violation which shall include the refutation, remedial action taken, or proposed remedial action by the Charter School specific to each alleged violation, on or before **September 26, 2025**, the Board may proceed with the process for revoking HCCS' Charter.

II. VIOLATIONS OF THE CHARTER

CICA has committed the following material violations of the conditions, standards, or procedures set forth in the Charter and the MOU:

A. Grade Level Changes

Education Code section 47604(a)(4) provides in part: "After receiving approval of its petition, a charter school that proposes to expand operations to one or more additional sites or grade levels shall request a material revision to its charter and shall notify the chartering authority of those additional locations or grade levels."

CICA's Charter only authorizes the Charter School to provide instruction to students in grades 1, 2, and 12. However, CICA enrolled students in grades 9 and 10 without submitting a material revision request, in violation of its Charter and Education Code section 47604(a)(4).

By correspondence dated August 28, 2024, HCCTS sent a letter to the District stating that CICA had added grade 9 and 10 through a non-material revision to its Charter based on the approval of District staff on October 29, 2020. The District sent an inquiry to HCCTS on September 30, 2025, requesting evidence to support HCCTS' statement the District has approved the change in grades through non-material revision. The District reviewed the documentation provided by HCCS and with correspondence dated On February 3, 2025, the District informed the Charter School that it had failed to notify the District before changing the approved grade levels. *(See Exhibit A and B.)*

B. Location Changes

On or about January 23, 2024, the District and HCCTS agreed to the MOU Amendment No. 3 which included a list of approved locations for CICA's charter school operations. The MOU Amendment No. 3 includes the express requirement for CICA to submit a written request if the "Charter School seeks to establish operations at one or more additional locations(s) or move any of its existing location(s), including satellite facilities or resource centers…" CICA's enrollment reports submitted beginning with July 2024 through March 2025 reflect students enrolled at locations that are not approved in MOU Amendment No. 3.

In addition, on October 3, 2024, October 17, 2024, and November 7, 2024 the HCCTS Board of Directors approved multiple locations for CICA operations which are not

included in the list of approved locations identified MOU Amendment No. 3. The District has sent multiple communications regarding HCCTS' addition of locations without submitting a material revision request. In a Notice of Concern dated April 23, 2025, the District outlined specific steps that must be taken to address discrepancies and comply with MOU Amendment No. 3. To-date, no material revision request has been submitted for these locations and CICA continues to operate at these locations in violation of the MOU Amendment No. 3 and Education Code section 47605(a)(4). *(See Exhibit A, C, and I.)*

Additionally, HCCTS has failed to provide fully executed copies of lease agreements as requested in the District's April 23, 2025, Notice of Concern/Request for Information. As the chartering authority, the District is entitled to information and documentation regarding the Charter School's operations (Ed. Code, § 47604.3). The failure to timely provide such information interferes with the District's oversight obligations

III. VIOLATIONS OF LAW

CICA has committed the following violations of law:

A. Failure to Submit Annual Independent Audit Report

Education Code section 47064.33(a) requires that all charter schools file certain periodic financial reports, including annual audits. Likewise, section 47064.33(b) recognizes the importance for the charting authority to rely on these and any other financial reports in carrying out its oversight duties and "monitoring the fiscal condition of [a] charter school." (Ed. Code, § 47064.33(b).) Additionally, Education Code § 47605(m) requires charter schools to, "...transmit a copy of its annual, independent financial audit report for the preceding fiscal year...to its chartering authority...by December 15 of each year."

On March 19, 2025, the District sent a Request for Information requiring HCCTS to submit the annual independent financial audit report no later than March 31, 2025. When HCCTS failed to comply, the District sent a Notice of Concern to HCCTS dated April 7, 2025 and outlined a requirement for HCCTS to submit the annual report by April 18, 2025. A subsequent Notice of Concern was sent to HCCTS on April 24, 2025 requiring HCCTS to submit the report by May 5, 2025. To date CICA's audit report has not been submitted to the District. *(See Exhibit D and I.)*

CICA is in violation of Education Code sections 47604.33 and 47605, and its own Charter, for failing to complete and submit its 2023-24 annual independent audit report to the District. CICA's failure to provide its annual audit report for 2023-24, hinders the District's ability to properly carry out its duties as charter authorizer to oversee the Charter School's operations and monitor its fiscal condition.

Failure to respond timely and adequately to inquiries regarding its annual, independent financial audit report and operations at facilities constituting a violation of § 47604.3. *(See Exhibit C and D.)*

B. Credential Misassignments

Education Code section 47605(l) provides in part: "Teachers in charter schools shall hold the Commission on Teacher Credentialing certificate, permit, or other document required for the teacher's certificated assignment. These documents shall be maintained on file at the charter school and are subject to periodic inspection by the chartering authority."

HCCTS has provided instruction to its students using teachers who do not hold the appropriate credential as required by the Education Code. In correspondence dated March 17, 2025, HCCTS represented that Nancy Mora, Credentials Technician from San Diego County Office of Education ("SDCOE"), provided them with a recommendation that the Adult Education Credentials would be the appropriate credential for HCCTS teachers of record in a general education K-12 assignment. The District inquired with the California Commission on Teacher Credentialing ("CTC") and in correspondence dated March 11, 2025, received clarification confirming that the SDCOE's interpretation was incorrect: "While the credential was not designed only for providing instruction in an adult setting like the Designated Subjects Adult Education teaching credential, both the Multiple Subject and Single Subject teaching credentials authorize teaching in classes for adults in the respective classroom settings…" HCCTS failed to seek guidance from the CTC regarding credential requirements, but instead relied on faulty information from the Ms. Mora resulting in disallowed ADA. (*See Exhibit G*)

C. Failure to Track Minimum Instructional Minutes

California Education Code 47612.5 mandates that charter schools provide a minimum number of annual instructional minutes equivalent to those required of traditional public schools. Before March 2025, CICA did not have a process or documentation to ensure compliance with minimum instructional minutes. On September 9, 2024, Melissa Roberson, Director of Accountability and Assessment, HCCTS stated "Due to the nature of independent study, CICA does not currently have an instructional minutes report."

By correspondence dated October 30, 2025, the District notified HCCTS that the requirement to meet minimum instructional minutes was outlined in Education Code 47612.5 and CICA's Charter, which states "CICA will maintain no less than the minimum number of instructional days and minutes required by the Education Code and/or the California Code of Regulations for each grade level served." In the October 30 correspondence, the District requested the documentation that CICA uses to ensure the minimum number of instructional days and minutes are being met.

HCCTS responded on November 26, 2024, and stated that while pacing guides had been created at the beginning of the 2023-24 year to ensure compliance with minimum instructional minutes, HCCTS had only recently submitted the pacing guides to their legal counsel to evaluate the documentation. HCCTS stated that they would "make any necessary adjustments" and provide the District with the information after they were presented to the HCCTS Board of Directors.

By correspondence dated February 19, 2025, the District requested an update regarding the original request regarding how CICA ensures that the minimum number of

instructional days and minutes are being met. On March 24, 2025 HCCTS provided a 20-page response. The March 2025 response from HCCTS failed to adequately address the request and caused additional concerns as outlined below:

- Potential material changes to the instruction model to a Course-Based Independent Study delivery. This would require the HCCTS Board approval as outlined in Education Code 51749.5. If CICA has moved to a Course-Based Independent Study model the District does not believe the pacing guides contain all of the required information that the HCCTS Board of Directors would need to certify the minutes.

- The hours listed for each course are not totaled and, in some cases, do not meet minimum instructional minute requirements as outlined in Education Code 51747.5. Failure to include the total hours fails to provide the District with the originally requested information to outline how CICA ensures the minimum instructional minutes are being met.

- The documentation provided by CICA omitted any explanation for assignments during weeks that might have less than five school days and how the requirements are met for those weeks, which reflects an overall inadequate explanation with their pacing guides.

- HCCTS failed to explain if all students are required to carry a full workload, which is required information in order to determine whether the minimum instructional minutes are being met.

- The April 2025 documentation appears to have errors as some of the assignments show 7.24 hours while others show 7.25 hours. These errors include an issue with the English A course in which there are no time valuations for the "Guided Notes Completion" column. While this may be correct, there is no explanation regarding how this course would total 103.2 hours as represented by HCCTS.

- The District notes additional concerns with the English C and Pre-Algebra A for which total hours and an explanation for discrepancies would be required to fully show the minimum instructional minutes are being met.

- Upon review of the calendar which was attached to HCCTS March 2025 response, the District was unable to verify 204 days. The start date on the calendar is July 8, 2025, which would be more than 204 days, however, the HCCTS May 15, 2025 Board meeting had a completely different calendar which indicates the first day of school as August 6, 2025.

The above demonstrates CICA's fiscal mismanagement and violation of the law. *(See Exhibit E.)*

D. Violation of Exclusive Partnership Agreement

During its 2024–25 oversight review, the District discovered that HCCTS had allowed individuals who were not enrolled students to participate in its Career Technical Education (CTE) Truck Driving program. This practice violates the legal requirement that instruction

be provided exclusively in partnership with Workforce Innovation and Opportunity Act (WIOA) programs. According to HCCTS, this practice began in 2014 at the direction of a Board member, was supported by the Executive Director, and continued with Board approval through the 2024–25 school year. The issue was previously raised during the 2018 FCMAT audit of HCCS. In a letter dated June 22, 2018, HCCTS asserted that Education Code sections 47612.1(a) and 47605.1 requires a charter school "provide instruction exclusively in partnership with WIOA," but does not require the charter school to "operate exclusively in partnership with" WIOA. While the District agrees with the interpretation of law as outlined by HCCTS in its letter dated June 22, 2024, the practice of providing instruction to non-students as part of HCCTS' partnership with the Volunteers of America, Local 185 Union, Sacramento County Sheriff's Office, and the Sacramento Police Department, violates this agreement. *(See Exhibit H)*

VI. FISCAL MISMANAGEMENT

CICA has failed to meet generally accepted accounting principles, and/or engaged in fiscal mismanagement as follows:

A. San Diego Administrative Location

As approved by the HCCTS Board of Directors on or about August 4, 2022, HCCTS secured a site at 406 9th Avenue, Suite 310, San Diego, CA 92101 ("San Diego site"), HCCTS represents that the San Diego site is used for administrative purposes despite having no students in or near the area. However, public records show the location is marketed as luxury office condominiums, with Suite 310 (HCCTS' suite) advertised as having a "dedicated balcony with unparalleled view of Petco Park" and being the highest priced suite among the listed units for this address at the purchase price amount of $725,000.

MOU Amendment No. 3 does not include the San Diego location as an administrative site for CICA. However, on October 3, 2024 and November 17, 2024 HCCTS' Board of Directors adopted the location as an Admin Facility for both HCCS and CICA.

This costly expenditure of a public funds on an administrative condominium located nowhere near CICA student locations constitutes fiscal mismanagement of public funds. *(See Exhibit F and I.)*

V. CONCLUSION AND REMEDY PERIOD

Please be advised that the District views CICA's material violations of the conditions, standards, or procedures of its Charter, failure to meet generally accepted accounting principles, or engaged in fiscal mismanagement, and violations of law as grounds to issue this Notice of Violation and the District may pursue further steps towards revocation of the Charter if these violations are not remedied.

Section 11968.5.2(c) describes a charter school governing body's obligation once a Notice of Violation is received:

> Upon receipt of a Notice of Violation, the charter school's governing body, as described in the school's charter, if it chooses to respond, shall take the following actions:
>
> (1) Submit to the chartering authority a detailed, written response addressing each identified violation which shall include the refutation, remedial action taken, or proposed remedial action by the charter school specific to each alleged violation; the written response shall be due by the end of the remedy period identified in the Notice of Violation; and
>
> (2) Attach to its written response supporting evidence of the refutation, remedial action, or proposed remedial action, if any, including written reports, statements, and other appropriate documentation.

To that end, the District provides HCCTS with a remedy period of up to and including **September 26, 2025**, to provide the written response described above.

While the District appreciates and acknowledges HCCTS' responsiveness to various requests for information and notices of concern in other areas over the past twelve months, HCCTS has either failed to remedy multiple areas of concern despite its receipt of multiple information requests and notices of concern from the District or makes promises of future improvements without offering viable plans that either have been implemented or are capable of being implemented by HCCTS.

As a result and since the District views HCCS' material violations of the conditions, standards, or procedures of its Charter and MOU, failure to meet generally accepted accounting principles, or engaged in fiscal mismanagement, and violations of law as grounds for revocation, the District has determined that the point has been reached where it is necessary to initiate the first step in the formal revocation process contained in the Education Code, which is the issuance of a Notice of Violation per Education Code section 47607(g) and Title 5, Cal. Code of Regulations, section 11968.5.2.

Sincerely,

Steve Martinez, Ed. D
Superintendent

cc: Dave Gordan, Sacramento County Superintendent of Schools (dgordon@scoe.net)

Enclosures: Exhibits A-I

Exhibit C

California State Board of Education Policy

POLICY #	DATE
01-04	April 2002

SUBJECT

Advisory Commission on Charter Schools

REFERENCES

Education Code Sections 33031 and 47634.2(b).

HISTORICAL NOTES

This policy was originally approved in October 2001. Minor technical amendments were made in April 2002.

Establishment. In accordance with the requirements of Education Code Section 47634.2(b), and for purposes of providing for its own government in keeping with Education Code Section 33031, the State Board of Education (State Board) hereby establishes the Advisory Commission on Charter Schools (ACCS).

Membership. The ACCS shall be composed of nine members. Eight of the members shall be appointed by the State Board to two-year terms on a calendar-year basis. The ninth member of the ACCS, who shall be deemed to be appointed by the State Board, represents the State Superintendent of Public Instruction and shall be designated by the State Superintendent. For purposes of the initial appointments to the ACCS, four members shall be designated by the State Board to serve three-year terms in order to establish a proper staggering of appointments. The remainder of the year 2001 shall be disregarded in relation to the terms of office of the initial appointees. Individuals may be re-appointed to subsequent terms on the ACCS without limit. Within the membership of the ACCS, the State Board shall ensure that all of the following groups are represented: school district superintendents, charter schools, teachers, parents (guardians), members of the governing boards of school districts, and county superintendents of schools. A single individual may represent more than one group.

Background Statement. Charter schools are a promising means for generating higher student achievement. The State Board has been assigned by statute a strategic role to ensure that this promise of higher student achievement is realized within a context of sound educational programs and practices, proper financial management, and certain specific requirements of law. The State Board's role includes, but is not limited to, the following:

- Selective granting of charter petitions that have been denied or not renewed by local education agencies, but that the State Board determines to have met statutory requirements.

- Taking appropriate action, including, but not limited to, revocation with respect to State Board-granted and locally-granted charters under specific circumstances set forth in statute.

- Establishing appropriate funding levels for nonclassroom-based charter schools.

- Jointly with the State Superintendent, approving districtwide charter petitions when those petitions are determined to be satisfactory.

- Developing and adopting regulations to implement various provisions of the *Charter Schools Act of 1992* (Part 26.8 of the Education Code, commencing with Section 47600).

- Approving or denying requests to waive otherwise applicable provisions of law.

- Assigning numbers to charter school petitions to ensure that the statutory cap on the number of charter schools is not exceeded.

Duties of the ACCS. The ACCS shall advise the State Board on all aspects of the State Board's duties under the *Charter Schools Act of 1992*. In so doing, the ACCS shall assist the State Board in carrying out the State Board's proper role of ensuring that charter schools realize higher student achievement within a context of sound educational programs and practices, proper financial management, and other specific requirements of law. Priority areas for consideration by the ACCS will include the first three matters listed in the Background Statement above: selective granting of charters; taking appropriate action, including, but not limited to, revocation of charters; and establishing appropriate funding levels for non-classroom based charter schools.

Applicability of *Bagley-Keene Open Meeting Act*. In accordance with law, meetings of the ACCS are subject to the requirements of the *Bagley-Keene Open Meeting Act*.

Chair and Rules of Governance. From among the members of the ACCS, the State Board shall designate a chair. The chair shall typically serve a one-year term in that office, unless otherwise specified by the State Board. The chair may from time to time surrender to another member the duty of presiding over a meeting of the ACCS as he or she deems necessary and appropriate. The ACCS may establish bylaws for its own government as it deems necessary. Unless otherwise addressed in bylaws it may establish, the ACCS shall follow *Robert's Rules of Order (Newly Revised)*. No fewer than five members shall be deemed a quorum of the ACCS for purposes of conducting meetings. Each formal recommendation of the ACCS shall require an affirmative vote of at least five members.

Staff to the ACCS. The California Department of Education (CDE) shall provide staff support for the ACCS, including, agenda preparation, posting of meeting notices, distribution of meeting materials to ACCS members, maintenance of records regarding ACCS recommendations to the State Board, making of travel arrangements and filing of travel claims, and such other staff support as the members of the ACCS may need.

Travel, Lodging, and Other Expenses. Members of the ACCS shall be entitled to receive CDE-purchased airline tickets and reimbursements for travel, lodging, and other expenses only to the extent permitted by applicable provisions of statute and the *State Administrative Manual*.

Frequency of Meetings. The ACCS may hold meetings as necessary based upon the members' assessment of workload in consultation with CDE staff.

Exhibit D

Filed 10/27/26 Case 26-02134 Doc 20

California AE Provider Directory

Search for a Program

Enter a city name, zip code, or address into the Search location text box, choose a result radius from the Radius drop-down list, and select the Find button to search for Adult Education providers. Results within the chosen radius will be displayed below in a list ordered by distance from your search point. Please contact us if you need assistance finding an Adult Education provider.

Search by city, zip, or address

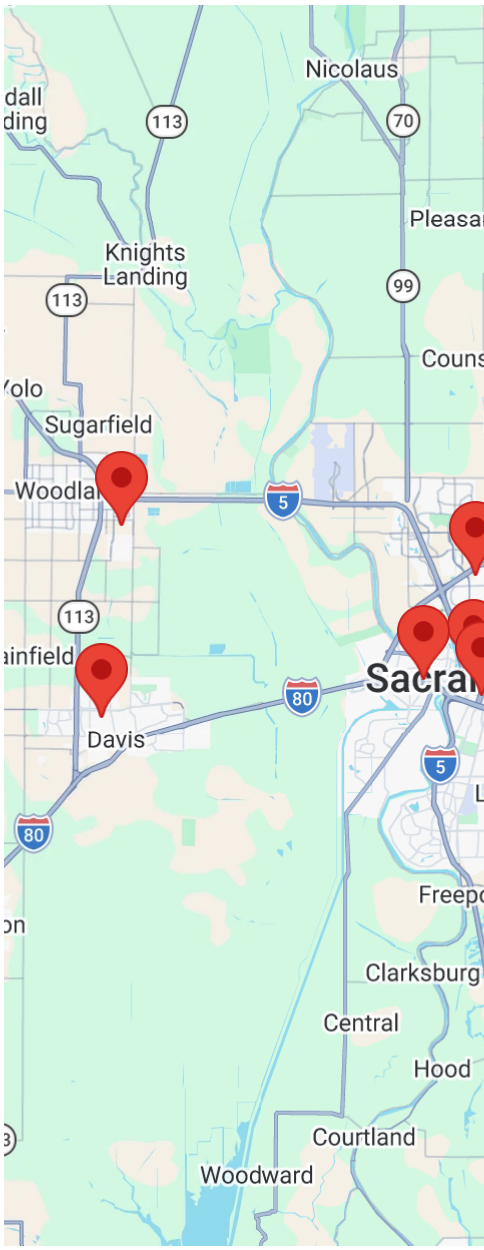
Search location:

Find

Radius:

15 mi

Search by Name



- McClellanCenter (8 miles)
- Sacramento Lao Family Community Inc. (9 miles)
- Center Joint Unified School District (11 miles)
- Folsom Cordova Adult School (11 miles)
- Davis Adult and Community Education (13 miles)
- Director College/Career Readiness & Adult Education Director (14 miles)
- Woodland Community College (14 miles)

Outreach and Technical Assistance Network

P.O. Box 269003

Sacramento, CA 95826-9003

916-228-2580

support@otan.us

Social Media

Keep in touch and follow us on the leading social media channels:

W3C WCAG 2.1 AA

Exhibit E

Filed 10/27/26 Case 26-02134 Doc 20

ADULT EDUCATION CAREER & WORKFORCE PREPARATION
FALL 2025



* IET - Integrated Education and Training: the school offers additional training specifically to ESL students in the industry noted as Integrated Education Training which includes career education, ESL and Job Preparation training. Please check with school for more information.

IN-PERSON NO FEE | ONLINE NO FEE | HYBRID NO FEE | IN-PERSON FEE ($) | ONLINE FEE ($) | HYBRID FEE ($)

Exhibit F

Filed 10/27/26 Case 26-02134 Doc 20

Menu

Map View

Northern California
See School Locations Below ↓

Central California
See School Locations Below ↓

Southern California
See School Locations Below ↓

Find a John Muir Charter School Near You

With 35 locations throughout Northern, Central, and Southern California, John Muir Charter Schools connects students with education, job skills, and career training close to home. Choose from career pathways in Agriculture, Construction, Energy and Power Technology, Forestry and Natural Resources, Public and Community Health, and Tourism and Recreation.

Your Selected

x Northern California Clear All

Showing all 17 results Sort By (Default)

Agriculture
JMCS at Earle Jameson (EJ)
Grass Valley, CA, USA
July 24, 2025
Agriculture
Construction, Energy, & Power Technology
Food Service & Hospitality
Forestry & Natural Resources
Public & Community Health
Tourism & Recreation
July 24, 2030

JMCS at Rancho Cielo Construction and Culinary Academies
710 Old Stage Road Salinas, CA 93912
December 14, 2023
Agriculture
Construction, Energy, & Power Technology
Food Service & Hospitality
Forestry & Natural Resources

JMCS at Richmond YouthBuild
360 S 27th St, Richmond, CA 94804
December 14, 2023
Construction, Energy, & Power Technology

JMCS at Conservation Corps North Bay – Youth Connections Santa Rosa
1260 N. Dutton Ave., Ste. 275 Santa Rosa, CA 95401
December 14, 2023
Forestry & Natural Resources

JMCS at Conservation Corps North Bay – Santa Rosa
3555 Airway Dr, Santa CA 95403
December 14, 2023
Forestry & Natural Resources

JMCS at Sacramento Regional CC
6101 27th Street Sacramento, CA 95822
December 14, 2023
Food Service & Hospitality
Public & Community Health
Tourism & Recreation

Filed 10/27/26 Case 26-02134 Doc 20

Menu

JMCS at Conservation Corps North Bay – San Rafael

27 Larkspur Street San Rafael, CA 94901
December 14, 2023

Forestry & Natural Resources

JMCS at Mendocino CCC

600 East Hill Road, Willits, CA 95490
November 15, 2023

Food Service & Hospitality

Forestry & Natural Resources

JMCS at Siskiyou CCC

1515 South Oregon St., Suite B Yreka, CA 96097
November 15, 2023

Forestry & Natural Resources

JMCS at Sacramento CCC

570 Bercut Drive Sacramento, CA 95811
November 15, 2023

Construction, Energy, & Power Technology

Forestry & Natural Resources

JMCS at Redding CCC

4900 Mountains Lakes Blvd., Suite A Redding, CA 96003
November 15, 2023

Forestry & Natural Resources

JMCS at Placer CCC

3710 Christian Valley Rd Auburn 95602
November 15, 2023

Food Service & Hospitality

Forestry & Natural Resources

JMCS at Solano CCC

1020 Chadbourne Rd. Fairfield, CA 94534
November 15, 2023

Forestry & Natural Resources

JMCS at Monterey Bay CCC

30 Aviation Way Watsonville, CA 95076
November 15, 2023

Forestry & Natural Resources

JMCS at Delta CCC

7000 Newcastle Rd, Stockton, Ca 95215
November 15, 2023

Food Service & Hospitality

Forestry & Natural Resources

JMCS at Chico CCC

341 Huss Dr Chico, CA 95928
November 15, 2023

Forestry & Natural Resources

June 5, 2031

JMCS at Fortuna CCC

1500 Alamar Way Fortuna, CA 95540
June 20, 2023

Food Service & Hospitality

Forestry & Natural Resources

June 4, 2031

Filed 10/27/26 Case 26-02134 Doc 20

Menu

High School That Conforms to You. Not The Other Way Around.

We are a free alternative high school in California equipping 14- to 26-year-olds to earn their diplomas and prepare for fulfilling careers. No matter where you've been, what you've been told, or why you're here, you can graduate from our high school. Our job training and educational, social, and emotional support is designed to fit into your life.

Refer

Partner

Advocate

Enroll

Find a School Site Near You

Request Transcripts

Exhibit G

HIGHLANDS
COMMUNITY CHARTER AND TECHNICAL SCHOOLS

September 26, 2025

Ryan DiGiulio
Chief Business Official
Twin Rivers Unified School District
5115 Dudley Blvd
McClellan Park, CA 95652

Subject: Notice of Violation Pursuant to Education Code 47606 for Highlands Community Charter School

Dear Mr. DiGiulio,

On June 12, 2025, Twin Rivers Unified School District ("TRUSD") provided Highlands Community Charter and Technical Schools ("HCCTS") with a formal Notice of Violation. We recognize the seriousness of the issues outlined and we acknowledge that, under prior leadership, Highlands failed to meet expectations in several important areas. Mistakes were made, and those mistakes have eroded trust.

Since that time, Highlands has undergone a profound transition. With new leadership and outside experts engaged in finance and compliance, we have embraced accountability and implemented sweeping reforms. HCCTS is also in the process of bringing on a new board of directors to lead the school in improved governance and systems of accountability. Changes include:

- New systems for financial oversight and internal controls,
- Stronger credentialing processes in partnership with UMass Global,
- Clearer academic and attendance standards, with daily monitoring,
- Adoption of more than 100 new board policies to strengthen compliance and transparency, and

- A material revision to the HCCS charter which outlines these and other changes to HCCS.

HCCTS is committed to working in close partnership with TRUSD to demonstrate that these changes are not temporary fixes, but lasting improvements. Our goal is to move forward with a constructive relationship, grounded in transparency and shared accountability, to ensure Highlands is in full compliance and able to continue serving our students.

We respectfully submit the enclosed materials as HCCTS' formal response to the Notice of Violation. If you have additional questions or would like further information, please do not hesitate to contact me directly at (617) 823-9341 or jonathan.raymond@hccts.org.

Thank you for your attention and for your ongoing oversight as we work to build a stronger, more accountable Highlands.

Thank you,



Jonathan Raymond
Executive Director
Highlands Community Charter and Technical Schools

I. BACKGROUND

Highlands Community Charter and Technical Schools recognizes and respects TRUSD's role as our authorizer, as outlined in MOU Amendment No. 3 signed on January 23, 2024. This amendment clearly defines the district's oversight responsibilities, including the approval of new facilities, ensuring safe learning environments, and providing supervisorial guidance.

We acknowledge that the Notice of Violation issued on June 12, 2025, falls squarely within TRUSD's responsibilities. We take this notice with the utmost seriousness. Under past leadership, Highlands fell short of meeting expectations in several areas. Mistakes were made, and we own that.

Today, under new leadership,, Highlands is fully committed to addressing every issue raised. In many cases, corrective actions have already been completed; in others, substantial progress is underway. Where issues remain outside of our direct control, we have taken every step possible to mitigate them and are actively working toward full resolution.

This response provides a clear account of the corrective actions already taken, the progress still in motion, and the timelines by which remaining matters will be fully resolved. Our commitment is to demonstrate that Highlands is not only curing past deficiencies but building a sustainable, compliant, and transparent system for the future.

II. VIOLATIONS OF THE CHARTER

A. HCCTS Grade Levels

Education Code section 47604(a)(4) provides in part: "After receiving approval of its petition, a charter school that proposes to expand operations to one or more additional sites or grade levels shall request a material revision to its charter and shall notify the chartering authority of those additional locations or grade levels."

- *There are no exemptions for the requirement to submit a material revision request to change grade levels.*
- *The District is issuing the NOV as part of our oversight responsibilities to address HCCS' failure to submit the required Material Revision request to change grades.*

Education Code section 47605(a)(4) makes clear that a charter school seeking to expand operations to additional sites or grade levels must submit a material revision to its charter and notify its authorizer. HCCTS recognizes that there are no exemptions to this requirement and acknowledges that it did not submit a material revision when grade levels were changed beginning in the 2020–21 school year.

In the 2020-2021 school year, leadership at HCCTS shifted from grades 1, 2, and 12 to grades 9, 10, and 12 in order to:

- Create clarity in the community that HCCS was a high school
- Align more closely with traditional high school programs
- Allow English Language Learners the opportunity to earn high school credits and make progress toward their high school diploma
- Show student progress as students move between grade levels
- Create clear pathways for international high school students and high school students to graduation
- To improve graduation rates

While HCCTS communicated with TRUSD staff regarding these changes (Exhibit A) and believed the adjustments had support, the formal requirement for a material revision was not pursued at that time. We recognize this was a failure of process, and we take responsibility for not following the proper procedures.

Since then, Highlands has taken corrective action. In June 2024, HCCTS began preparing a comprehensive material revision. That revision reflects:

- The addition of grade 11, as requested by TRUSD (Exhibits B & C),
- The removal of grades 1 and 2, and
- The continued offering of grades 9, 10, and 12.

The proposed material revision was completed and board approved on September 18, 2025, see Exhibit D, after which it will be submitted to TRUSD for consideration. This action is intended to fully align Highlands' charter with current practice, CDE guidance, and TRUSD oversight. The proposed revision is attached here as Exhibit E.

Accordingly, this issue will be fully resolved once TRUSD acts on the submitted material revision. If the TRUSD Board does not approve the revision, HCCTS will comply by returning to the grade levels specified in the existing approved charter.

Highlands regrets that this process was not followed in the past. Under new leadership, we are committed to full compliance, clear communication, and a constructive working relationship with TRUSD to ensure that changes moving forward are properly authorized and transparent.

Attached you will find the following documents to support HCCTS' response to this issue:

- Exhibit A: 2024.12.02 HCCTS Response Grade 9 and 10
- Exhibit B: 2024.06.03 TRUSD RFI High School Program

- Exhibit C: 2024.08.28 HCCTS Addition of 11th Grade
- Exhibit D: Board Agenda for September 18, 2025 HCCTS Board of Directors
- Exhibit E: HCCS Material Revision Board approved on September 18, 2025

B. HCCS Locations

MOU Amendment No. 3 provides in part: "The terms of the MOU are intended by the District and Charter School to become part of the standards and procedures set forth in the Charter School's Charter approved by the District ("Charter"). Along with the Charter, this MOU will govern the relationship between the District and the Charter School regarding the operation of the Charter School. To the extent the terms of the MOU is/are inconsistent with any terms of the Charter, the MOU shall control. In addition, if the Charter is silent on an issue addressed by the MOU, the MOU shall control. As such, any violation of MOU by Charter School that also constitutes grounds for revocation per Education Code section 47607 will be treated and enforced by the District in the same manner, subject to Education Code Section 47607 and applicable implementing regulations, as it would any other violation constituting a ground for revocation."

- *October 3, 17 and November 7, 2024 HCCTS Board approved sites/locations that were not included on MOU Amendment No. 3.*
- *On multiple occasions the District notified HCCTS of the requirement to submit a material revision request, before occupying a new location. HCCTS failed to comply.*
- *HCCTS June 1, 2025, newest "tentative" location list still includes sites not approved for operation for HCCS.*
- *The District is issuing the NOV as part of our oversight responsibilities to address HCCS' failure to submit the required Material Revision request before adding new facilities.*

MOU Amendment No. 3 governs the approval and operation of Highlands' facilities and makes clear that any new locations require District authorization through a material revision. Highlands acknowledges that in the past, locations were opened or relocated without first completing the formal material revision process required by the MOU. This was a failure of compliance, and we take responsibility for it.

These missteps were not intentional, but they reflect a lack of attention to detail under prior leadership. Historically, Highlands relied on a more informal process with the District regarding the addition, relocation, or consolidation of sites. In some cases, leadership believed that moves such as opening an additional suite within an existing facility or relocating to a site nearby did not constitute a "new" location requiring a material revision. That interpretation was incorrect, and we recognize that now.

The District's request for an updated site list on June 1, 2025, coincided with a period of significant transition at Highlands, including organizational restructuring and site consolidations. While those circumstances contributed to delays in providing a finalized list, they do not excuse the failure to comply with the MOU requirement.

Highlands has since taken corrective steps. A material revision updating all current operating locations was prepared and sent to the HCCTS Board on September 18, 2025 for submission to TRUSD. Moving forward, Highlands will strictly comply with the requirement to submit a material revision for any facility location change, ensuring that the District is fully informed and that all operations are authorized.

This issue will be fully resolved once the TRUSD Board approves the submitted material revision. If the Board does not approve certain sites, Highlands will immediately limit operations to District-approved locations.

Under new leadership, Highlands is committed to transparency, accuracy, and compliance in its facilities reporting and to maintaining a constructive partnership with TRUSD on all matters related to school sites.

Below are the HCCS locations as approved in the HCCS material revision on September 18, 2025:

HCCA Locations 2025-2026	
Student Serving Locations	
Name	Address
33rd St.	2520 33rd St, Sacramento, CA 95817
37th Ave.	3301 37th Avenue, Sacramento, CA 95824
Boxwood St.	2260 Boxwood Street, Sacramento, CA 95815
Center Pkwy.	7839 Center Parkway, Sacramento, CA 95823
College Oak Dr.	4545 College Oak Drive, Sacramento, CA 95841
Folsom Blvd.	10013 Folsom Blvd, Sacramento, CA 95827
Franklin Blvd.	5961 Franklin Blvd, Sacramento, CA 95824
Hillsdale Blvd.	5655 Hillsdale Blvd, Sacramento, CA 95842
Howe Ave.	1111 Howe Avenue, Sacramento, CA 95825
Hurley Way	3205 Hurley Way, Sacramento, CA 95864
Industrial Pkwy.	8180 Industrial Parkway, Sacramento, CA 95824

Marconi Ave.	3727 Marconi Ave, Sacramento, CA 95821
Old Auburn Rd.	7817 Old Auburn Road, Citrus Heights, CA 95610
Todhunter Ave.	800 Todhunter Avenue, West Sacramento, CA 95605

Administrative Support Locations	
Name	Address
Arden Way	901 Arden Way, Sacramento, CA 95815 (Warehouse/Receiving)
Florin Rd.	3801 Florin Road, Suite 107, Sacramento, CA 95823
Hemlock St.	5537 Hemlock Street, Sacramento, CA 95841

III. ALLEGED VIOLATIONS OF THE LAW

A. HCCTS Annual Independent Audit Report

The Charter School is in violation of Education Code sections 47604.33 and 47605, and its own Charter, for failing to complete and submit its 2023-24 annual independent audit report to the District.

- *HCCTS requested an extension to the December 15, 2024, deadline for submitting its 2023-24 audit report.*
- *The District granted an extension until January 15,2025, but HCCTS failed to meet this deadline and has subsequently missed multiple additional extension deadlines, including March 31, 2025, and April 18,2025.*
- *To-date HCCTS' audit report has not been submitted to the District.*
- *The District is issuing the NOV as part of TRUSD oversight responsibilities to address HCCS' failure to submit the 2023-24 annual independent audit report.*

Education Code sections 47604.33 and 47605, as well as the HCCTS charter, require timely completion and submission of an annual independent audit report. Highlands acknowledges that the 2023–24 audit has not yet been submitted to TRUSD and that multiple deadlines were missed.

Highlands contracted with Eide Bailly to conduct the 2023–24 audit (Exhibit F). While a draft was provided on May 9, 2025, the process has been significantly delayed due to a combination of external and internal factors (Exhibit G). These include:

- Eide Bailly's 2022–23 audit being selected for review by the State Controller, which diverted capacity and slowed the 2023–24 work,

- Errors identified in the draft related to unduplicated pupil counts, which required national-level review and corrections, and

- Additional testing required following the release of the California State Auditor's report, which heightened risk assessments.

Highlands has consistently provided documentation requested by the auditor and followed up on promised delivery timelines as demonstrated in Exhibit J which details an extensive list of document requests fulfilled by HCCTS staff. However, the final report has not yet been released by Eide Bailly. Legal counsel has formally demanded its completion (Exhibit H) and Highlands continues to press for immediate resolution (Exhibit I).

To date, Eide Bailly has not indicated any significant findings in the draft report. While the delay has been deeply frustrating, Highlands has acted in good faith throughout the process, and the draft report demonstrates that we have been cooperative and responsive.

Moving forward, Highlands will ensure timely completion of audits by:

- Holding vendors accountable through stricter contracts and oversight; and

- Engaging with TRUSD earlier in the process to provide status updates and transparency.

We will provide TRUSD with the completed audit report immediately upon its release by Eide Bailly. We regret the delays and are committed to ensuring this problem does not repeat.

Attached you will find the following documents:

- Exhibit F: Eide Bailly Communication Tracker 2024-2025
- Exhibit G: 2025.04.17 Letter from Eide Bailly regarding State Controller and State Auditor
- Exhibit H: 2025.8.5 Letter to Eide Bailly Requesting Production of Audit
- Exhibit I: 2025.9.11 YM&C Follow-up letter to Eide Bailly
- Exhibit J: Document requests from Eide Baily fulfilled by HCCTS

B. HCCTS Credentialing & Misassignments

HCCS has provided instruction to its students using teachers who do not hold the appropriate credential as required by California Education Code, which is a requirement for receipt of ADA funding.

- *HCCTS has submitted ADA revisions for teachers who did not have any credential, but the majority of HCCTS teachers do not have the appropriate, required credentials.*
- *ADA funding is directly tied to appropriately credentialed teachers.*
- *HCCTS relied on guidance from a Credentials Technician from San Diego County Office of Education (SDCOE) and her interpretation of credential requirements, but failed to consult with the CTC.*
- *The District is issuing the NOV as part of our oversight responsibilities to address the disallowed ADA which resulted in misappropriately credentialed teachers.*

Highlands agrees that all teachers must hold valid teaching credentials and that paraeducators should not serve as classroom teachers without them. We acknowledge that, under prior practice, Highlands relied on adult education credentials based on guidance previously received from outside agencies (Exhibit K). While this approach was followed for years without audit findings, it did not meet current expectations from CDE and CTC, and we take responsibility for correcting it.

Beginning in 2024–25, Highlands laid off teachers who did not hold the required credentials and re-staffed classes with appropriately credentialed teachers (Exhibit L). We also undertook a full review of our credentialing and staffing systems to ensure alignment with updated guidance and long-term compliance (Exhibit M).

Key corrective actions include:

- **Credentialing Review:** Examined over 300 staff profiles and held 269 individual consultations with certificated staff to create personalized compliance pathways.

- **Support Systems:** Established a credentialing support team of staff and consultants; built a centralized credentialing database; and partnered with UMass Global to provide flexible, remote intern credential pathways (Exhibit N and Exhibit O), and are hiring mentor teachers (Exhibit P, Exhibit Q, and Exhibit R)

- **Financial and Professional Support:** Adopted Board Policy 4112.3 (Exhibit S) to reimburse staff for exam fees and coursework; approved a K–12 Teacher Retention Incentive (Exhibit T), and aligned hiring timelines with CTC testing windows and permit options.

- **Hiring Reforms:** Suspended instruction in July 2025 to allow time to re-staff with fully credentialed teachers before the school year, implemented structured hiring and rehire processes tied to credential readiness; and issued updated teacher agreements.

- **Governance Safeguards:** Adopted new board policies requiring all certificated staff to hold valid credentials at hire and renewal, mandating use of Frontline to track compliance, and prohibiting nepotism in hiring through Board Policy 4212.8 (Exhibit U).

Through these actions, Highlands has corrected past practices and put in place systems that ensure all teachers moving forward will hold valid K–12 credentials. Instruction has resumed with properly credentialed staff, and we are committed to ongoing monitoring and support to keep Highlands fully compliant.

This issue is now resolved, and Highlands has turned the page with stronger systems that protect both compliance and instructional quality.

Attached you will find evidence of steps taken by HCCTS to fully cure alleged teacher credentialing issues:

- Exhibit K: Email from San Diego County Office of Education Nancy Mora
- Exhibit L: Resolution Of The Board Of Directors Of Highlands Community Charter And Technical Schools Approving Reduction In Force For Credentialed Teachers
- Exhibit M: 4112.2 BP Credentialing Requirements Communications
- Exhibit N: 2025.06.10 Formalized agreement with UMass Global
- Exhibit O: Example of Teacher Agreement HCCTS K-12 Single Subject Credential Pathway
- Exhibit P: Mentor Teacher Job Description (Full Time)
- Exhibit Q: Edjoin Mentor Teacher Job Posting
- Exhibit R: Mentor Teacher at Highlands Community Charter School - Sacramento _ EDJOIN.pdf
- Exhibit S: 4112.3 BP Teacher Credentialing Reimbursements
- Exhibit T: Teacher Retention Bonus Agreement
- Exhibit U: 4212.8 BP - Anti-Nepotism and Employment of Relatives

C. HCCS Instructional Minutes

Demonstrating fiscal mismanagement and its non-compliance with the law, HCCS has received ADA funds while not meeting requirements for collecting ADA apportionment as outlined by the Education Code. Specifically, Education Code 47612.5(e)(1) states: "For purposes of calculating average daily attendance for classroom-based instruction apportionments, at least 80 percent of the instructional time offered by the charter school shall be at the schoolsite, and the charter school shall require the attendance of all pupils for whom a classroom-based apportionment is claimed at the school site for at least 80 percent of the minimum instructional time required..."

- *It was observed by Scott Leaman and Dennis Snelling (TRUSD Contractors/Consultants) that **some** students were being sent home with packets, arriving and leaving continuously without intending to stay, and provided work packets as part of the instructional day.*

- *HCCS submitted ADA revisions for 22-23 and 23-24 school years to address classes taught by non- credentialed teachers and to address items identified by the Attendance Report authored by Dennis Snelling, but the revisions did not address this violation.*
- *Further compounding the issue and contributing to the disallowed ADA, is the fact that HCCS discarded attendance records, thereby removing any documented evidence of student attendance, which is necessary to verify the accuracy of enrollment reported for ADA.*
- *HCCTS is required to address the practices outlined above and the disallowed ADA resulting from the violation of Ed. Code.*
- *The District is issuing the NOV as part of our oversight responsibilities to address HCCS' failure to meet the requirement for at least 80% of instruction to be offered at the school site.*

Highlands Community Charter and Technical Schools (HCCTS) acknowledges that past classroom observations identified instances where ***some*** students arrived late, left early, or were provided instructional packets when departing. However, Highlands is appealing the State Auditor's findings for both schools because it has always maintained a written policy requiring daily attendance that was and is communicated in the student handbook (Exhibit V) and reinforced during new student onboarding.

In regard to disallowed ADA, there were numerous flaws with the state audit process as noted in our request for summary review for Highlands that was filed with the Education Audit Appeals Panel and the formal appeal that was filed with the Education Audit Appeals Panel for CICA. Among them was the assertion in the state audit report that Highlands did not do enough to enforce its attendance policy, which led to the conclusion that the schools owed back a significant amount of apportionment to the state. Please see our attached appeal and supporting documents (Exhibits W & X) for more information on the legal and factual issues in dispute.

It is important for you to know that Highlands staff made substantial efforts to engage students, including phone calls, texts, and emails during the audit period. More than 5,000 outreach contacts specifically regarding attendance were recorded during the state audit period (Exhibit Y). Highlands also offered wrap-around support such as food pantries, clothing closets, and counseling to reduce barriers to attendance. Technology access was suspended when students were disenrolled for non-compliance.

In short, Highlands is appealing the State Auditor findings because we believe that the Auditor misinterpreted the law and did not consider records provided by Highlands that demonstrate efforts to enforce its attendance policy. Because the appeals process is ongoing, we do not have a final decision as of the date of filing this NOV response, but Highlands is diligently pursuing this appeal.

Highlands also recognizes that its handling of paper back-up records for attendance was inconsistent. While PowerSchool serves as the official record of attendance under Education Code § 44809 and 5 C.C.R. § 401, paper records were intended to provide redundancy in case of system outages. Some records were not centralized, creating the perception that they had been discarded. TRUSD staff are welcome to review our paper attendance records at any time. Highlands acknowledges that best practice is to retain these back-up records for at least three years and has committed to doing so going forward (Exhibit Z).

Notwithstanding the fact that Highlands believes in good faith that they met all legal requirements during the period reviewed by the State Auditor, in response to the state audit and district oversight, Highlands has taken the following additional steps:

- Surveyed all sites to confirm the retention of thousands of paper records from the last three years
- Adopted new procedures to ensure consistent retention of both digital and paper records (Exhibit Z)
- Standardized attendance enforcement across sites, with clear protocols for outreach and intervention (Exhibit Y)
- Contracted with Schoolhouse Partners, LCC to complete a forensic audit (Exhibit AB)

Highlands is committed to continuous improvement in this area. We will ensure attendance expectations are consistently communicated, enforcement is applied uniformly across all sites, and records are retained in accordance with law and best practice (Exhibit Z). Our goal is not only compliance, but to strengthen the systems that keep students engaged, supported, and on track to succeed (Exhibit AA).

To improve in the areas of attendance tracking and enforcement, HCCTS has taken corrective action to address and resolve these concerns, as outlined below. HCCS has strengthened both policies and record-keeping practices as follows:

1. Attendance Enforcement
    a. 5111.5 Disenrollment and Involuntary Removal (Revised and Approved 03/20/2025) - Outlines the involuntary disenrollment for students who accumulate ten consecutive unexcused absences despite HCCS staff's efforts to re-engage them (Exhibit AD).
    b. 5113.1 BP Attendance Enforcement (Approved 03/20/2025) - Outlines 80% attendance rule (Exhibit AA)
    c. 5120 BP Satisfactory Academic Progress (Approved 03/20/25) - Outlines students must maintain active attendance. Requires that all manual attendance records, including sign-in sheets, be retained for a minimum of three years in accordance with the California Code of Regulations, Title 5. (Exhibit AC)

d. 5131 BP Student Conduct (Revised and Approved 03/20/2025) - Outlines the ramifications of students who forge attendance records (Exhibit AE)
e. 6164.5 BP Student Success Teams (Revised and Approved 04/25/2025) - Outlines interventions to support students reportedly struggling with attendance (Exhibit AF)

2. Updated Bell Schedules for the 2025-2026
    a. Contains 5 periods rather than 3 periods for the AM schedule (Exhibit AG)
    b. Has only one track (Exhibit AI)
    c. Meets the minimum number of instructional minutes (Exhibit AH)
    d. Has only one PM schedule for all sites, rather than three (as in the 2024-2025 school year) (Exhibit AG)

3. Class Sizes
    a. 6151 BP Class Sizes and Enrollment (Approved 5/15/2025) - Sets class size and enrollment guidelines to support instruction and student success. Ensures manageable student-to-teacher ratios and adapts to program needs. Aligns class sizes with physical space limits and adjusts as needed (Exhibit AJ)
    b. 6170 BP Student-to-Teacher/Paraeducator Ratios (Approved 6/5/2025) - Sets student-to-teacher and paraeducator ratios to support instructional quality and safety. Limits general class sizes to 40:1 and follows legal ratios for independent study. Assigns paraeducators based on need, targeting 1 per 120 students. Provides extra support for students with SST or 504 plans (Exhibit AK)
    c. 7110 BP Physical Classroom Capacity (Approved 5/15/2025) - Defines and enforces classroom capacity limits to comply with safety codes and building regulations. Coordinates capacity limits with enrollment policies to support safe attendance (Exhibit AL)

4. Additional Attendance Measures:
    a. Automated Attendance Notifications: Robocalls and text alerts will immediately notify students of attendance deficiencies.
    b. Enhanced Teacher Training: Teachers will receive strengthened training on attendance monitoring and engagement tracking.
    c. The 80% Attendance Rule: Students must maintain at least 80% attendance to remain engaged in learning, per California Education Code § 51747. (Exhibit AA)
    d. Administrative Spot Checks: School administrators will conduct random compliance checks to ensure adherence to attendance policies.
    e. Updated Tiered Re-engagement Framework: Students with persistent attendance or academic progress issues will follow a structured re-engagement process.

Those who fail to improve despite interventions may be disenrolled in accordance with school policy BP 5111.5. (Exhibit AD)

HCCTS has taken all steps that it can to improve attendance policies, re-engagement strategies, and employee training to ensure students are re-engaged when there are attendance concerns. These changes should fully cure any outstanding concern that the District could have relating to attendance going forward. HCCTS also has taken all steps necessary to pursue its appeals of apportionment findings with regard to the state audit period where it believes that it met all legal requirements. There is nothing more that HCCTS can do with regard to the audit appeals until such time as a decision is made by the Education Audit Appeals Panel

HCCTS Evidence

- Exhibit V: HCCS Student Handbook
- Exhibit W: Request for review to Education Audit Appeals Panel
- Exhibit X: Request for Formal Appeal for CICA
- Exhibit Y: PowerSchool logs related to attendance
- Exhibit Z: 3581 BP Data Retention and Record Management
- Exhibit AA: 5113.1 BP Attendance Enforcement
- Exhibit AB: School House Partners - Forensic Auditors
- Exhibit AC: 5120 BP Satisfactory Academic Progress
- Exhibit AD: 5111.5 Disenrollment and Involuntary Removal
- Exhibit AE: 5131 BP Student Conduct
- Exhibit AF: 6164.5 BP Student Success Teams (SSTs)
- Exhibit AG: Bell Schedule 2025-2026
- Exhibit AH: HCCS Instructional Minutes
- Exhibit AI: Academic Calendar 2025-2026
- Exhibit AJ: 6151 BP Class Sizes and Enrollment
- Exhibit AK: 6170 BP Student-to-Teacher/Paraeducator Ratios
- Exhibit AL: 7110 BP Physical Classroom Capacity

D. HCCTS Exclusive Partnership Agreement

"Instruction must be provided exclusively in partnership with Workforce Innovation and Opportunity Act (WIOA) programs."

- *During its 2024–25 oversight review, the District discovered that HCCTS had allowed individuals who were non-students to participate in its Career Technical Education (CTE) Truck Driving program.*
- *The practice began in 2014 at the direction of a Board member, was supported by the Executive Director, and continued with Board approval through 2024-25.*
- *The WIOA partnership agreement requires instruction to be provided exclusively in partnership with WIOA.*

- *Providing instruction to non-students as part of HCCTS' partnership with the Volunteers of America, Local 185 Union, Sacramento County Sheriff's Office, and the Sacramento Police Department, violates this agreement.*
- *The District is issuing the NOV as part of our oversight responsibilities to address the breach of the exclusive partnership agreement and all resulting funds tied to the agreement.*

Highlands acknowledges that past practices in the Truck Driving program violated the requirements of our Workforce Innovation and Opportunity Act (WIOA) partnership agreement, which stipulates that instruction must be provided exclusively in partnership with WIOA programs. Beginning in 2014, and with the support of prior leadership, non-students were allowed to participate in the program through informal arrangements with outside organizations.

Highlands takes full responsibility for this lapse. Under current leadership, the practice has been ended and corrective steps have been taken to ensure compliance. Specifically:

- A formal investigation was completed by the Director of HR in 2024–25 (Exhibit AM).
- Disciplinary action was taken against an employee.
- A stop notice was issued in December 2024 prohibiting non-student participation (Exhibit AN).
- Between December 2024 and January 2025, Highlands discontinued informal partnerships with Local 185, the Sacramento Police Department, and the Sacramento County Sheriff's Office.
- On January 6, 2025, Highlands officially ended all non-student participation across programs (Exhibit AO).
- The Truck Driving program was suspended and will remain paused until Highlands can ensure full compliance with WIOA requirements, its charter, and the MOU.

These actions have fully cured the issue. Moving forward, Highlands has strengthened oversight of program partnerships, reinforced compliance training for staff, and adopted new safeguards to ensure all instruction aligns exclusively with WIOA requirements. This reflects our commitment to correcting past mistakes, complying with all partnership agreements, and ensuring that every program we operate directly serves only enrolled students.

Attached you will find the following documents showing progress made by HCCTS regarding the truck driving program:

- Exhibit AM: 2025.03.28 Letter from HCCTS detailing investigation into the Truck Driving program

- Exhibit AN: 2024.12.02 TRUSD Findings Regarding Truck Driving
- Exhibit AO: 2024.12.02 Truck Driving Program Follow-up

IV. FISCAL MISMANAGEMENT

A. HCCTS San Diego Location

Engaged in fiscal mismanagement.

- *The condominium advertises being able to "watch the ballgame from your balcony" and is the highest priced unit in the facility.*
- *The decision to engage in this exorbitant real estate transaction, even though students were not in or around the area is questionable.*
- *Compounding the issue is the fact that the admin facility lacks any direct connection to educational services or student benefit demonstrating a fiscal mismanagement.*
- *The District is issuing the NOV as part of our oversight responsibilities to ensure that HCCTS address the fiscal mismanagement.*

Highlands acknowledges that the decision to lease a condominium office in San Diego was a misstep that does not align with our mission or our responsibility to ensure all expenditures directly benefit students. While the space was briefly used by a remote employee and originally intended to support exploration of expansion opportunities, the location did not provide meaningful educational value. We recognize that this was poor judgment under prior leadership and understand the District's concern that this constituted fiscal mismanagement.

Highlands has since vacated the property and taken corrective steps to minimize the financial impact. We engaged Newmark Realty on March 27, 2025, to sublease the space, revised the listing in June 2025, and remains prepared to accept any commercially reasonable offer. While it is not possible to control the timing of sublease offers, Highlands is committed to recouping as much value as possible and bringing this matter to resolution (Exhibit AP and Exhibit AQ).

This decision reflects mistakes of the past. Moving forward, Highlands has implemented stronger financial controls and multi-level approval processes to ensure that all facility and spending decisions are directly tied to student learning and educational services. These safeguards are designed to prevent similar errors and to reinforce our commitment to fiscal responsibility, transparency, and compliance.

Attached below you will find:

- Exhibit AP: Sublease Agreement for San Diego
- Exhibit AQ: Sublease Marketing Materials by Newark Realty

B. HCCS Marysville 2 Location

"engaged in fiscal mismanagement" regarding the allegations listed below:

- *HCCTS terminated the lease effective November 30, 2024, with an agreement that obligates HCCTS to continue paying $33,639.80 in lease payments through April 30, 2026.*
- *HCCTS sold publicly funded equipment (valued at $52,494.34) to the City of Marysville f or $1.00.*
- *The ongoing lease payments, the disposal of equipment at a nominal price, and the initial misrepresentation of the site's intended use constitute fiscal mismanagement.*

Highlands acknowledges that the decision to open and lease the Marysville 2 site under prior leadership was unsound and did not reflect appropriate planning or stewardship of public resources. Entering into the lease and purchasing equipment were poor decisions that created the appearance — and in practice, the reality — of fiscal mismanagement.

In November 2024, Highlands reached a termination agreement with the City of Marysville that ended the lease early (Exhibit AR). While Highlands remains obligated to make lease payments through April 2026, this arrangement resulted in a net savings of approximately $88,000 compared to the original lease terms. The transfer of equipment for $1 was part of the inducement necessary to secure this early termination and avoid further taxpayer losses (Exhibit AS and Exhibit AT).

While this solution limited financial damage, Highlands acknowledges that the initial decision to enter into the lease and purchase equipment without a detailed instructional or operational plan was a mistake. This is an important lesson, and the current administration is committed to ensuring that all future facility decisions are grounded in sound strategic planning, tied directly to student benefit, and compliant with the requirements of MOU Amendment No. 3.

This matter has been resolved to the fullest extent possible given the circumstances created under prior leadership. Moving forward, Highlands has implemented stronger financial controls and multi-level approval processes to ensure that no facility or equipment decisions are made without thorough analysis, transparency, and clear educational purpose. The current administration did not have the ability to prevent or unwind those initial decisions. Instead, our responsibility now is to mitigate losses and resolve the matter as prudently as possible.

Marysville 2 – Lease, Oversight, and Financial Summary Timeline

1. **May 1, 2023 – Lease Execution**
   HCCTS entered into a lease with the City of Marysville for Bryant Field at $2,000/month

with a 3% annual increase. Intended use: CTE training site (landscaping, sports officiating) and community events. (Exhibit AU and Exhibit AV)

2. **June 24, 2023 – Sponsorship Event**
   HCCTS hosted "Highlands Night at the Ballpark" with approximately 250 attendees. This event was conducted under the $25,000 sponsorship agreement with the Marysville Drakes.

3. **March 14, 2024 – First TRUSD Notice of Concern**
   TRUSD raised concerns about the site's use, lack of student enrollment, and legality of the $25,000 sponsorship.

4. **April 5, 2024 – HCCTS Initial Response**
   HCCTS clarified CTE plans, explained the sponsorship as a marketing expense, and explained lease terms.

5. **June 17, 2024 – TRUSD Follow-Up Letter**
   TRUSD questioned the lease-before-enrollment practice and raised student health/safety concerns due to the site's outdoor-only nature.

6. **July 23, 2024 – HCCTS Second Response**
   HCCTS reiterated program planning steps, outlined the plan to expand officiating in August 2024, and confirmed indoor fallback at Marysville 1.

7. **August 15, 2024 – Third TRUSD Notice of Concern**
   TRUSD requested a final decision on the site's future and additional documentation on the sponsorship under Ed Code §47604.3.

8. **September 24, 2024 – HCCTS Response**
   HCCTS acknowledged staffing issues, stated that they had no knowledge of how the $25,000 was used by the Drakes, and confirmed lease termination discussions. (Exhibit AW)

9. **October 16, 2024 – TRUSD Closure of Sponsorship Inquiry**
   TRUSD determined no further action was required regarding the sponsorship and asked to be informed of the lease status. (Exhibit AY)

10. **November 30, 2024 – Lease Termination Executed**
    The lease was mutually terminated. HCCTS agreed to pay $33,639.80 in lease-equivalent payments through April 30, 2026, and transferred $52,494.34 in equipment to the City for $1, with rights to reclaim if HCCTS reuses the site.

11. **January 14, 2025 – HCCTS Lease Termination Report**
    HCCTS formally confirmed lease closure, financial commitments, and equipment disposition with the right of retrieval.

12. **February 19, 2025 – Final HCCTS Report**
    HCCTS documented the marketing event ("Highlands Night at the Ballpark"), confirmed equipment transfer, and noted the option to return if CTE programs are re-established. (Exhibit AZ)

13. **June 9, 2025 – TRUSD Notice of Violations and Revocation Consideration**
TRUSD issued a formal letter identifying alleged violations by HCCTS, including:
    - Misuse of public funds for a private baseball team
    - Program inactivity during the lease term
    - Transfer of $52,000+ in equipment for $1
    - Continuation of lease-equivalent payments post-termination

Evidence

- Exhibit AR: Mutual Termination of Lease Agreement
- Exhibit AS: Marysville_Expenses Chart
- Exhibit AT: Itemized Equipment from Marysville 2
- Exhibit AU: Marysville_Baseball field Lease agreement
- Exhibit AV: Marysville 2_Lease agreement
- Exhibit AW: 2024.09.24 Response NOC_RFI Marysville 2
- Exhibit AY: 2024.10.16 Letter from TRUSD with findings regarding Marysville 2
- Exhibit AZ: 2025.02.19 Letter from HCCTS explaining use of equipment following termination of Marysville 2 lease

V. Employment of Celebrities & Professional Athletes and Use of Public Funds

The District has asked Highlands to provide additional information regarding past employment arrangements for individuals identified as "professional/celebrity athletes." Highlands has previously shared details on this matter and offers the following to close out all outstanding questions.

Under prior leadership, salaries and job classifications for these employees were not aligned with established job descriptions or salary schedules. Highlands acknowledges that this was a mistake and understands the District's concern.

Since then, Highlands has taken corrective action:

- Job descriptions for the relevant positions were updated and formally approved by the Board.

- Roles were reviewed and reclassified to ensure alignment with board-approved duties and appropriate compensation structures.

- These employees are no longer employed by Highlands as of the 2025–26 school year so this is not an ongoing issue..

Highlands also recognizes that these issues were symptomatic of a broader lack of policies and procedures to govern hiring, compensation, and promotions. To address this, Highlands has engaged Jennifer Lopez Consulting, LLC to conduct a comprehensive review of all related

policies, with recommendations due by December 2025. The Board will consider these recommendations to ensure consistent, transparent practices moving forward.

We further acknowledge the State Auditor's finding that the absence of clear policies created the potential for inequity and favoritism. Highlands is committed to fully implementing the Auditor's recommendations and to ensuring that compensation practices are fair, transparent, and aligned with both law and best practice. Recommendations 22 and 23 from the State Audit Report are below, along with our current status of implementation.

Recommendation 22

To ensure that pay is assigned equitably and based on merit and performance, Highlands should implement policies by December 2025 to create a merit-based structure for devising its salary schedules, evaluating staff, assigning salaries and salary increases, and deciding on annual bonus amounts.

HCCTS BP 4111 (Exhibit BA) establishes the requirement for a structured hiring process including screening of candidates, panel interview requirements, and offers of employment. HCCTS Board Policy 4111.2 (Exhibit BB), establishing a structured and equitable promotion process that recognizes demonstrated competence. In alignment with these policies, HCCTS will collaborate with an independent contractor to develop policies and procedures that ensure a fair and consistent pay structure. Additionally, HCCTS has implemented staff evaluations through the third-party platform Frontline, providing a centralized system for storing and referencing all evaluations.

Recommendation 23

To prevent favoritism and pay inequity, Highlands should, by December 2025, implement a policy to adhere to its salary schedules and not allow executive management to approve increases outside of salary schedule limits.

Currently no employees at HCCTS have salaries that are outside of the salary schedule based on their job description. HCCTS's new Chief Operations Officer (COO) is currently reviewing all salaries to identify and address potential pay inequities and continuing to improve the process of determining starting salaries for all employees. The COO will work with an independent contractor to ensure that a comprehensive set of policies and procedures, including salary schedules and pay increases, is in place and fully implemented by January 2026.

Evidence

- Exhibit BA: 4111 BP
- Exhibit BB:4111.2 BP

VI. SUMMARY

This response provides evidence that HCCS has either already fully cured or has taken every possible step to cure all of the concerns raised by the District and will continue to vigorously pursue resolution of the few items that are outside of the school's control.

Exhibit H

HIGHLANDS
COMMUNITY CHARTER AND TECHNICAL SCHOOLS

September 26, 2025

Ryan DiGiulio
Chief Business Official
Twin Rivers Unified School District
5115 Dudley Blvd
McClellan Park, CA 95652

Subject: Notice of Violation Pursuant to Education Code 47606 for California Innovative Career Academy

Dear Mr. DiGiulio,

On June 12, 2025, Twin Rivers Unified School District ("TRUSD") provided Highlands Community Charter and Technical Schools ("HCCTS") with a formal Notice of Violation. We recognize the seriousness of the issues outlined and we acknowledge that, under prior leadership, HCCTS failed to meet expectations in several important areas. Mistakes were made, and those mistakes have eroded trust.

Since that time, CICA has undergone a profound transition. With new leadership and outside experts engaged in finance and compliance, we have embraced accountability and implemented sweeping reforms. HCCTS is also in the process of bringing on a new board of directors to lead the school in improved governance and systems of accountability. Changes include:

- New systems for financial oversight and internal controls,
- Stronger credentialing processes in partnership with UMass Global,
- Clearer academic and attendance standards, with daily monitoring,
- Adoption of more than 100 new board policies to strengthen compliance and transparency, and

- A material revision to CICA's charter which outlines these and other changes.

We are committed to working in close partnership with TRUSD to demonstrate that these changes are not temporary fixes, but lasting improvements. Our goal is to move forward with a constructive relationship, grounded in transparency and shared accountability, to ensure CICA is in full compliance and able to continue serving our students.

We respectfully submit the enclosed materials as HCCTS' formal response to the Notice of Violation. If you have additional questions or would like further information, please do not hesitate to contact me directly at (617) 823-9341 or jonathan.raymond@hccts.org.

Thank you for your attention and for your ongoing oversight as we work to build a stronger, more accountable HCCTS.

Thank you,



Jonathan Raymond
Executive Director
Highlands Community Charter and Technical Schools

I. BACKGROUND

California Innovative Career Academy (CICA) recognizes and respects TRUSD's role as our authorizer, as outlined in MOU Amendment No. 3 signed on January 23, 2024. This amendment clearly defines the district's oversight responsibilities, including the approval of new facilities, ensuring safe learning environments, and providing supervisorial guidance.

We acknowledge that the Notice of Violation issued on June 12, 2025, falls squarely within TRUSD's responsibilities. We take this notice with the utmost seriousness. Under past leadership, California Innovative Career Academy (CICA) fell short of meeting expectations in several areas. Mistakes were made, and we own that.

Today, under new leadership, CICA is fully committed to addressing every issue raised. In many cases, corrective actions have already been completed; in others, substantial progress is underway. Where issues remain outside of our direct control, we have taken every step possible to mitigate them and are actively working toward full resolution.

This response provides a clear account of the corrective actions already taken, the progress still in motion, and the timelines by which remaining matters will be fully resolved. Our commitment is to demonstrate that CICA is not only curing past deficiencies but building a sustainable, compliant, and transparent system for the future.

II. VIOLATIONS OF THE CHARTER

A. CICA Grade Levels

Education Code section 47604(a)(4) provides in part: "After receiving approval of its petition, a charter school that proposes to expand operations to one or more additional sites or grade levels shall request a material revision to its charter and shall notify the chartering authority of those additional locations or grade levels."

- *There are no exemptions for the requirement to submit a material revision request to change grade levels.*
- *The District is issuing the NOV as part of our oversight responsibilities to address CICA' s failure to submit the required Material Revision request to change grades.*

Education Code section 47605(a)(4) makes clear that a charter school seeking to expand operations to additional sites or grade levels must submit a material revision to its charter and notify its authorizer. CICA recognizes that there are no exemptions to this requirement and acknowledges that it did not submit a material revision when grade levels were changed beginning in the 2020–21 school year.

In the 2020-2021 school year, leadership at HCCTS shifted from grades 1, 2, and 12 to grades 9, 10, and 12 for the following reasons:

- Create clarity in the community that HCCS was a high school
- Align more closely with traditional high school programs
- Allow English Language Learners the opportunity to earn high school credits and make progress toward their high school diploma
- Show student progress as students move between grade levelsCreate clear pathways for international high school students and high school students to graduation
- To improve graduation rates

While HCCTS communicated with TRUSD staff regarding these changes (Exhibit A) and believed the adjustments had support, the formal requirement for a material revision was not pursued at that time. We recognize this was a failure of process, and we take responsibility for not following the proper procedures.

Since then, CICA has taken corrective action. In June 2024, HCCTS began preparing a comprehensive material revision. That revision reflects:

- The addition of grade 11, as requested by TRUSD (Exhibits B & C),
- The removal of grades 1 and 2, and
- The continued offering of grades 9, 10, and 12.

The proposed material revision was completed and board approved on September 18, 2025, see Exhibit D, after which it will be submitted to TRUSD for consideration. This action is intended to fully align CICA's charter with current practice, CDE guidance, and TRUSD oversight. The proposed revision is attached here as Exhibit E.

Accordingly, this issue will be fully resolved once TRUSD acts on the submitted material revision. If the TRUSD Board does not approve the revision, HCCTS will comply by returning to the grade levels specified in the existing approved charter.

CICA regrets that this process was not followed in the past. Under new leadership, we are committed to full compliance, clear communication, and a constructive working relationship with TRUSD to ensure that changes moving forward are properly authorized and transparent.

Attached you will find the following documents to support HCCTS' response to this issue:

- Exhibit A: 2024.12.02 HCCTS Response Grade 9 and 10
- Exhibit B: 2024.06.03 TRUSD RFI High School Program
- Exhibit C: 2024.08.28 HCCTS Addition of 11th Grade

- Exhibit D: Board Agenda for September 18, 2025 HCCTS Board of Directors
- Exhibit E: CICA Material Revision September 18, 2025

B CICA Locations

MOU Amendment No. 3 provides in part: "The terms of the MOU are intended by the District and Charter School to become part of the standards and procedures set forth in the Charter School's Charter approved by the District ("Charter"). Along with the Charter, this MOU will govern the relationship between the District and the Charter School regarding the operation of the Charter School. To the extent the terms of the MOU is/are inconsistent with any terms of the Charter, the MOU shall control. In addition, if the Charter is silent on an issue addressed by the MOU, the MOU shall control. As such, any violation of MOU by Charter School that also constitutes grounds for revocation per Education Code section 47607 will be treated and enforced by the District in the same manner, subject to Education Code Section 47607 and applicable implementing regulations, as it would any other violation constituting a ground for revocation."

- *October 3, 17 and November 7, 2024 HCCTS Board approved sites/locations that were not included on MOU Amendment No. 3.*
- *On multiple occasions the District notified HCCTS of the requirement to submit a material revision request, before occupying a new location. HCCTS failed to comply.*
- *HCCTS June 1, 2025, newest "tentative" location list still includes sites not approved for operation for HCCS.*
- *The District is issuing the NOV as part of our oversight responsibilities to address CICA's failure to submit the required Material Revision request before adding new facilities.*

MOU Amendment No. 3 governs the approval and operation of CICA's facilities and makes clear that any new locations require District authorization through a material revision. CICA acknowledges that in the past, locations were opened or relocated without first completing the formal material revision process required by the MOU. This was a failure of compliance, and we take responsibility for it.

These missteps were not intentional, but they reflect a lack of attention to detail under prior leadership. Historically, CICA relied on a more informal process with the District regarding the addition, relocation, or consolidation of sites. In some cases, leadership believed that moves — such as opening an additional suite within an existing facility or relocating to a site nearby — did not constitute a "new" location requiring a material revision. That interpretation was incorrect, and we recognize that now.

The District's request for an updated site list on June 1, 2025, coincided with a period of significant transition at CICA, including organizational restructuring and site consolidations.

While those circumstances contributed to delays in providing a finalized list, they do not excuse the failure to comply with the MOU requirement.

CICA has since taken corrective steps. A material revision updating all current operating locations was prepared and HCCTS Board approved on September 18, 2025 for submission to TRUSD. Moving forward, CICA will strictly comply with the requirement to submit a material revision for any facility location change, ensuring that the District is fully informed and that all operations are authorized.

This issue will be fully resolved once the TRUSD Board approves the submitted material revision. If the Board does not approve certain sites, CICA will immediately limit operations to District-approved locations.

Under new leadership, CICA is committed to transparency, accuracy, and compliance in its facilities reporting and to maintaining a constructive partnership with TRUSD on all matters related to school sites.

Attached you will find the following documents:

CICA Locations for the 2025-2026 school year board approved on September 18, 2025 in the CICA material revision

CICA Locations 2025-2026	
Student Serving Locations	
Name	Address
33rd St.	2520 33rd St, Sacramento, CA 95817
37th Ave.	3301 37th Avenue, Sacramento, CA 95824
Boxwood St.	2260 Boxwood Street, Sacramento, CA 95815
Center Pkwy.	7839 Center Parkway, Sacramento, CA 95823
College Oak Dr.	4545 College Oak Drive, Sacramento, CA 95841
Folsom Blvd.	10013 Folsom Blvd, Sacramento, CA 95827
Franklin Blvd.	5961 Franklin Blvd, Sacramento, CA 95824
Hillsdale Blvd.	5655 Hillsdale Blvd, Sacramento, CA 95842
Howe Ave.	1111 Howe Avenue, Sacramento, CA 95825
Hurley Way	3205 Hurley Way, Sacramento, CA 95864
Industrial Pkwy.	8180 Industrial Parkway, Sacramento, CA 95824
Marconi Ave.	3727 Marconi Ave, Sacramento, CA 95821

Old Auburn Rd.	7817 Old Auburn Road, Citrus Heights, CA 95610
Todhunter Ave.	800 Todhunter Avenue, West Sacramento, CA 95605

Administrative Support Locations	
Name	Address
Arden Way	901 Arden Way, Sacramento, CA 95815 (Warehouse/Receiving)
Florin Rd.	3801 Florin Road, Suite 107, Sacramento, CA 95823
Hemlock St.	5537 Hemlock Street, Sacramento, CA 95841

III. ALLEGED VIOLATIONS OF THE LAW

A. HCCTS Annual Independent Audit Report

The Charter School is in violation of Education Code sections 47604.33 and 47605, and its own Charter, for failing to complete and submit its 2023-24 annual independent audit report to the District.

- *HCCTS requested an extension to the December 15, 2024, deadline for submitting its 2023-24 audit report.*
- *The District granted an extension until January 15,2025, but HCCTS failed to meet this deadline and has subsequently missed multiple additional extension deadlines, including March 31, 2025, and April 18,2025.*
- *To-date HCCTS' audit report has not been submitted to the District.*
- *The District is issuing the NOV as part of TRUSD oversight responsibilities to address HCCS' failure to submit the 2023-24 annual independent audit report.*

Education Code sections 47604.33 and 47605, as well as the HCCTS charter, require timely completion and submission of an annual independent audit report. HCCTS acknowledges that the 2023–24 audit has not yet been submitted to TRUSD and that multiple deadlines were missed.

HCCTS contracted with Eide Bailly to conduct the 2023–24 audit (Exhibit F). While a draft was provided on May 9, 2025, the process has been significantly delayed due to a combination of external and internal factors (Exhibit G). These included:

- Eide Bailly's 2022–23 audit being selected for review by the State Controller, which diverted capacity and slowed the 2023–24 work;

- Errors identified in the draft related to unduplicated pupil counts, which required national-level review and corrections; and

- Additional testing required following the release of the California State Auditor's report, which heightened risk assessments.

HCCTS has consistently provided documentation requested by the auditor and followed up on promised delivery timelines as demonstrated in Exhibit J which details an extensive list of document requests fulfilled by HCCTS staff. However, the final report has not yet been released by Eide Bailly. Legal counsel has formally demanded its completion (Exhibit H) and HCCTS continues to press for immediate resolution (Exhibit I).

To date, Eide Bailly has not indicated any significant findings in the draft report. While the delay has been deeply frustrating, HCCTS has acted in good faith throughout the process, and the draft report demonstrates that we have been cooperative and responsive.

Moving forward, HCCTS will ensure timely completion of audits by:

- Holding vendors accountable through stricter contracts and oversight; and

- Engaging with TRUSD earlier in the process to provide status updates and transparency.

We will provide TRUSD with the completed audit report immediately upon its release by Eide Bailly. We regret the delays and are committed to ensuring this problem does not repeat.

Attached you will find the following documents:

1. Exhibit F: Eide Bailly Communication Tracker 2024-2025
2. Exhibit G: 2025.04.17 Letter from Eide Bailly regarding State Controller and State Auditor
3. Exhibit H: 2025.8.5 Letter to Eide Bailly Requesting Production of Audit
4. Exhibit I: 2025.9.11 YM&C Follow-up letter to Eide Bailly
5. Exhibit J: Document requests from Eide Baily fulfilled by HCCTS

B. HCCTS Credentialing & Misassignments

HCCTS agrees that all teachers must hold valid teaching credentials and that paraeducators should not serve as classroom teachers without them. We acknowledge that, under prior practice, CICA relied on adult education credentials based on guidance previously received from outside agencies (Exhibit K). While this approach was followed for years without audit findings, it did not meet current expectations from CDE and CTC, and we take responsibility for correcting it.

Beginning in 2024–25, CICA laid off teachers who did not hold the required credentials and re-staffed classes with appropriately credentialed teachers (Exhibit L). We also undertook a full review of our credentialing and staffing systems to ensure alignment with updated guidance and long-term compliance (Exhibit M).

Key corrective actions include:

- **Credentialing Review:** Examined over 300 staff profiles and held 269 individual consultations with certificated staff to create personalized compliance pathways.

- **Support Systems:** Established a credentialing support team of staff and consultants; built a centralized credentialing database; and partnered with UMass Global to provide flexible, remote intern credential pathways (Exhibit N and Exhibit O), and are hiring mentor teachers (Exhibit P,Exhibit Q, and Exhibit R)

- **Financial and Professional Support:** Adopted Board Policy 4112.3 (Exhibit S) to reimburse staff for exam fees and coursework; approved a K–12 Teacher Retention Incentive (Exhibit T); and aligned hiring timelines with CTC testing windows and permit options.

- **Hiring Reforms:** Suspended instruction in July 2025 to allow time to re-staff with fully credentialed teachers before the school year; implemented structured hiring and rehire processes tied to credential readiness; and issued updated teacher agreements.

- **Governance Safeguards:** Adopted new board policies requiring all certificated staff to hold valid credentials at hire and renewal, mandating use of Frontline to track compliance, and prohibiting nepotism in hiring through Board Policy 4212.8 (Exhibit U).

Through these actions, CICA has corrected past practices and put in place systems that ensure all teachers moving forward will hold valid K–12 credentials. Instruction has resumed with properly credentialed staff, and we are committed to ongoing monitoring and support to keep CICA fully compliant.

This issue is now resolved, and CICA has turned the page with stronger systems that protect both compliance and instructional quality.

Attached you will find evidence of steps taken by HCCTS to fully cure alleged teacher credentialing issues:

- Exhibit K: Email from San Diego County Office of Education Nancy Mora
- Exhibit L: Resolution Of The Board Of Directors Of Highlands Community Charter And Technical Schools Approving Reduction In Force For Credentialed Teachers

- Exhibit M: 4112.2 BP Credentialing Requirements Communications
- Exhibit N: 2025.06.10 Formalized agreement with UMass Global
- Exhibit O: Example of Teacher Agreement HCCTS K-12 Single Subject Credential Pathway
- Exhibit P: Mentor Teacher Job Description (Full Time)
- Exhibit Q: Edjoin Mentor Teacher Job Posting
- Exhibit R: Mentor Teacher at Highlands Community Charter School - Sacramento _ EDJOIN.pdf
- Exhibit S: 4112.3 BP Teacher Credentialing Reimbursements
- Exhibit T: Teacher Retention Bonus Agreement
- Exhibit U: 4212.8 BP - Anti-Nepotism and Employment of Relatives

C. CICA Instructional Minutes

California Education Code 47612.5 mandates that charter schools provide a minimum number of annual instructional minutes equivalent to those required of traditional public schools.

- *According to HCCTS' email correspondence, before March 2025, CICA did not have a process or documentation to ensure compliance with minimum instructional minutes.*
- *By correspondence dated October 30, 2025, the District notified HCCTS that the requirement to meet minimum instructional minutes was outlined in Education Code 47612.5 and CICA's Charter.*
- *In the October 30 correspondence, the District requested the documentation that CICA uses to ensure the minimum number of instructional days and minutes are being met.*
- *HCCTS' November 26, 2024 included a statement that they would immediately take action to ensure compliance with minimum instructional minutes.*
- *On March 24, 2025 HCCTS provided a 20-page response to the District's October 30th request.*
- *HCCTS' March 24 response has resulted in more questions than answers. Additionally, the initial request in the District's October 30th communication regarding the verification that CICA is complying with the minimum instructional minutes remains unanswered.*
- *The District is issuing the NOV as part of our oversight responsibilities to address CICA's failure to ensure the minimum instructional minutes have been met and the resulting disallowed ADA collected.*

As a traditional independent study school CICIA ensures it meets instructional time requirements by documenting daily student engagement, evaluating work products for time value, and offering synchronous and asynchronous learning opportunities. Pacing guides offer guidance to teachers for assigning work and assigning time-value to the work completed, with the goal of ensuring that the time-value completed should be equivalent to a seat based program. However CICA is not a course-based independent study school and the actual time value-earned depends on the certified teacher's judgment of individual work products and the time-value that teacher deems appropriate based on the teacher's assessment of the pupil's individual needs and capacities.

Engagement with the instructional program and time-value earned per student is tracked by the Assigned Work Record (Exhibit W). The Assigned Work Record contains a record of daily engagement and documentation of the time-value of each completed assignment. Students may only earn time value by engaging on days indicated as instructional days in the HCCTS Academic Calendar (Exhibit V)

It is the nature of traditional independent study that the actual time-value earned by a student can vary depending on the pupil. CICA pacing guides therefore constitute general recommendations for time-value earned per assignment, rather than prescriptions. A student may well earn more or less time value for a given course or assignment depending on the nature of their engagement of the course. The purpose in sharing pacing guides is to demonstrate that any student fully engaged has ample opportunity to participate in the equivalent of the required 64,800 minutes (Exhibit X).

Staffing challenges have since necessitated the adoption of a new calendar by the Board with the start date of August 14, 2025 (Exhibit V).

Please find the attached documents for your reference:

- Exhibit V: Academic Calendar 2025-2026
- Exhibit W: Assigned Work Record Template
- Exhibit X: March 24, 2025 HCCTS letter to TRUSD

D. HCCTS Exclusive Partnership Agreement

"Instruction must be provided exclusively in partnership with Workforce Innovation and Opportunity Act (WIOA) programs."

- *During its 2024–25 oversight review, the District discovered that HCCTS had allowed individuals who were non-students to participate in its Career Technical Education (CTE) Truck Driving program.*
- *The practice began in 2014 at the direction of a Board member, was supported by the Executive Director, and continued with Board approval through 2024-25.*
- *The WIOA partnership agreement requires instruction to be provided exclusively in partnership with WIOA.*
- *Providing instruction to non-students as part of HCCTS' partnership with the Volunteers of America, Local 185 Union, Sacramento County Sheriff's Office, and the Sacramento Police Department, violates this agreement.*
- *The District is issuing the NOV as part of our oversight responsibilities to address the breach of the exclusive partnership agreement and all resulting funds tied to the agreement.*

HCCTS acknowledges that past practices in the Truck Driving program violated the requirements of our Workforce Innovation and Opportunity Act (WIOA) partnership agreement, which stipulates that instruction must be provided exclusively in partnership with WIOA

programs. Beginning in 2014, and with the support of prior leadership, non-students were allowed to participate in the program through informal arrangements with outside organizations.

HCCTS takes full responsibility for this lapse. Under current leadership, the practice has been ended and corrective steps have been taken to ensure compliance. Specifically:

- A formal investigation was completed by the Director of HR in 2024–25 (Exhibit Y)
- Disciplinary action was taken against an employee.
- A stop notice was issued in December 2024 prohibiting non-student participation. (Exhibit Z)
- Between December 2024 and January 2025, HCCTS discontinued informal partnerships with Local 185, the Sacramento Police Department, and the Sacramento County Sheriff's Office.
- On January 6, 2025, HCCTS officially ended all non-student participation across programs. (Exhibit AA)
- The Truck Driving program was suspended and will remain paused until HCCTS can ensure full compliance with WIOA requirements, its charter, and the MOU.

These actions have fully cured the issue. Moving forward, HCCTS has strengthened oversight of program partnerships, reinforced compliance training for staff, and adopted new safeguards to ensure all instruction aligns exclusively with WIOA requirements. This reflects our commitment to correcting past mistakes, complying with all partnership agreements, and ensuring that every program we operate directly serves our enrolled students.

Attached you will find the following documents showing progress made by HCCTS regarding the truck driving program:

- Exhibit Y: 2025.03.28 Letter from HCCTS detailing investigation into the Truck Driving program
- Exhibit Z: 2024.12.02 TRUSD Findings Regarding Truck Driving
- Exhibit AA: 2024.12.02 Truck Driving Program Follow-up

IV. FISCAL MISMANAGMENT

A. HCCTS San Diego Location

Engaged in fiscal mismanagement.

- *The condominium advertises being able to "watch the ballgame from your balcony" and is the highest priced unit in the facility.*
- *The decision to engage in this exorbitant real estate transaction, even though students were not in or around the area is questionable.*
- *Compounding the issue is the fact that the admin facility lacks any direct connection to educational services or student benefit demonstrating a fiscal mismanagement.*
- *The District is issuing the NOV as part of our oversight responsibilities to ensure that HCCTS address the fiscal mismanagement.*

HCCTS acknowledges that the decision to lease a condominium office in San Diego was a misstep that does not align with our mission or our responsibility to ensure all expenditures directly benefit students. While the space was briefly used by a remote employee and originally intended to support exploration of expansion opportunities, the location did not provide meaningful educational value. We recognize that this was poor judgment under prior leadership and understand the District's concern that this constituted fiscal mismanagement.

HCCTS has since vacated the property and taken corrective steps to minimize the financial impact. We engaged Newmark Realty on March 27, 2025, to sublease the space, revised the listing in June 2025, and remains prepared to accept any commercially reasonable offer. While it is not possible to control the timing of sublease offers, HCCTS is committed to recouping as much value as possible and bringing this matter to resolution (Exhibit AB and Exhibit AC).

This decision reflects mistakes of the past. Moving forward, HCCTS has implemented stronger financial controls and multi-level approval processes to ensure that all facility and spending decisions are directly tied to student learning and educational services. These safeguards are designed to prevent similar errors and to reinforce our commitment to fiscal responsibility, transparency, and compliance.

Attached below you will find:

- Exhibit AB: Sublease Agreement for San Diego
- Exhibit AC: Sublease Marketing Materials by Newark Realty

VI. SUMMARY

This response provides evidence that CICA has either already fully cured or has taken every possible step to cure all of the concerns raised by the District and will continue to vigorously pursue resolution of the few items that are outside of the school's control.

Exhibit I

TwinRivers
UNIFIED SCHOOL DISTRICT

November 5, 2025

Board of Trustees

Basim Elkarra
President

Stacey Bastian
Vice President

Christine Jefferson
Clerk

Michael Baker
Member

Sharon Reichelt
Member

Rebecca Sandoval
Member

Sascha Vogt
Member

Superintendent
Steve Martinez, Ed.D.

VIA E-MAIL

Jonathan Raymond, Executive Director
Highlands Community Charter and Technical Schools
1333 Grand Ave.
Sacramento, CA 95838
Jonathan.Raymod@hccts.org

Highlands Community Charter and Technical Schools Board of Directors:
Sharon Rocco - silvr01@yahoo.com
Mary DeChance - Mary.Dechance@hccts.org
Mike Reid - Mike.Reid@hccts.org

RE: Notice of Intent to Revoke – Highlands Community Charter School

Dear HCCTS Board of Directors and Mr. Raymond:

I am writing to notify you that the Twin Rivers Unified School District ("District") Board of Trustees ("Board") at its meeting on November 4, 2025, unanimously approved issuing the enclosed Notice of Intent to Revoke to the Highlands Community Charter School ("HCCS") pursuant to Education Code section 47607 and Title 5, section 11968.5.2, of the California Code of Regulations.

As specified in the Notice of Intent to Revoke, a public hearing will be held on December 2, 2025, regarding revocation of HCCS's Charter. Should you desire to present at the public hearing and will have presentation materials, please contact Sharilyn Warta, District (sharilyn.warta@trusd.net) by no later than November 17, 2025, to coordinate the submission.

Sincerely,

Steve Martinez, Ed. D
Superintendent

cc: Dave Gordan, Sacramento County Superintendent of Schools (dgordon@scoe.net)

Enclosure: Notice of Intent to Revoke (HCCS)

To inspire each student to extraordinary achievement every day

NOTICE OF INTENT TO REVOKE
Highlands Community Charter School

This Notice of Intent to Revoke will be issued upon approval by the Twin Rivers Unified School District Board of Trustees

November 4, 2025

I. BACKGROUND

The Twin Rivers Unified School District ("District") Board of Trustees ("Board") initially approved the petition for the establishment of Highlands Community Charter School ("HCCS" or "Charter School") in 2014 for a term running through June 30, 2019. On or about March 5, 2019, the Board conditionally approved the petition to renew HCCS' Charter for a five-year term from July 1, 2019, through June 30, 2024 ("Charter"). Pursuant to Education Code section 47607.4, HCCS' Charter was automatically extended through June 30, 2027, by operation of law.

On or about May 19, 2019, the District and HCCS entered into a Memorandum of Understanding ("MOU") to document the arrangement and agreement between the parties regarding HCCS' program, operation, structure, and obligations. Subsequent amendments to the MOU approved by the Board extended its term through June 30, 2027. On or about January 23, 2024, the District and HCCS agreed to Amendment No. 3 of the MOU ("MOU Amendment No. 3") among other things, confirming the District's authorization of specified locations HCCS had established for charter school operations and makes other clarifications regarding the process for approval of any new facility locations, facility safety expectations, and supervisorial oversight.

MOU Amendment No. 3 provides in part:

> "The terms of the MOU are intended by the District and Charter School to become part of the standards and procedures set forth in the Charter School's Charter approved by the District ("Charter"). Along with the Charter, this MOU will govern the relationship between the District and the Charter School regarding the operation of the Charter School. To the extent the terms of the MOU is/are inconsistent with any terms of the Charter, the MOU shall control. In addition, if the Charter is silent on an issue addressed by the MOU, the MOU shall control. As such, any violation of MOU by Charter School that also constitutes grounds for revocation per Education Code section 47607 will be treated and enforced by the District in the same manner, subject to Education Code Section 47607 and applicable implementing regulations, as it would any other violation constituting a ground for revocation." [1](Emphasis added.)

HCCS is operated and governed independently by Highlands Community Charter and Technical Schools ("HCCTS"), a California nonprofit public benefit corporation, and its Board of Directors.

Following multiple and varying requests for information and notices of concern over a twelve-month

[1] "Charter School" as used in the MOU Amendment No. 3 collectively refers to Highlands Community Charter and Technical Schools and Highlands Community Charter School.

period, the District determined that HCCTS either failed to remedy multiple areas of concern despite its receipt of multiple information requests and notices of concern from the District or makes promises of future improvements without offering viable plans that either have been implemented or are capable of being implemented by HCCTS. As a result and since the District viewed HCCS' material violations of the conditions, standards, or procedures of its Charter and MOU, failure to meet generally accepted accounting principles, or engaged in fiscal mismanagement, and violations of law as grounds for revocation, the District determined that the point has been reached where it was necessary to initiate the first step in the formal revocation process contained in the Education Code, which is the issuance of a Notice of Violation per Education Code section 47607(g) and Title 5, Cal. Code of Regulations, section 11968.5.2, and at its meeting on June 17, 2025, recommended to the Board that it issue a Notice of Violation to HCCS.

On June 17, 2025, the Board approved issuance of the recommended Notice of Violation ("NOV") to HCCS pursuant to Education Code section 47607. In the NOV, the District identified HCCS' violations and including all evidence relied upon by the District as Exhibits. The NOV also provided HCCS with a reasonable opportunity to respond to and/or remedy the violations by September 26, 2025. The NOV documented specific factual findings and provided evidence to support each of the legal grounds for revocation. *(See NOV and its Exhibits A-H.)*

On September 26, 2025, HCCTS timely submitted its response ("HCCS Response") to the NOV. However, the supporting evidence was not provided to the District until September 29, 2025. *(See HCCS Response dated 9/26/26 and Exhibits A-BB.)*

II. NOTICE OF INTENT TO REVOKE

District staff have evaluated the HCCS Response and all documentation produced by HCCS. After conducting a thorough, objective, and data-driven review, District staff determined that HCCS has sufficiently addressed one of the violations, but has failed to refute to the District's satisfaction, or remedy all of the violations identified in the NOV, and significant violations continue to exist, including material violations of the conditions, standards, or procedures of its charter, and violations of law. Consequently, District staff recommends that the Board issue this Notice of Intent to Revoke and notice of facts in support of revocation to HCCS ("NIR") pursuant to Education Code section 47607 and Title 5, section 11968.5.2 of the California Code of Regulations ("Section 11968.5.2").

Upon the Board's determination that HCCS failed to refute, take remedial action, or propose remedial action specific to each of the alleged violations of the Charter and law identified in the NOV, it will adopt and issue this NIR to HCCS via the HCCTS Board of Directors based on the grounds for revocation set forth below:

1. HCCS committed a material violation of the conditions, standards, or procedures set forth in the charter.

2. HCCS violated any law.

3. HCCS failed to meet generally accepted accounting principles, and/or engaged in fiscal mismanagement.

The findings below and substantial evidence in support of issuing the NIR to HCCS conform to the standards and procedures of Education Code section 47607 and Section 11968.5.2. This report provides the District Board with a summary of the violations identified in the NOV, HCCS' Response, and the District staff's analysis of HCCS Response, and findings.

III. LEGAL AUTHORITY

Per Education Code section 47607(f):

> A charter may be revoked by the chartering authority if the chartering authority finds, through a showing of substantial evidence, that the charter school did any of the following:
>
> (1) Committed a material violation of any of the conditions, standards, or procedures set forth in the charter.
> (2) Failed to meet or pursue any of the pupil outcomes identified in the charter.
> (3) Failed to meet generally accepted accounting principles or engaged in fiscal mismanagement.
> (4) Violated any law.

A chartering authority commences the revocation process with the issuance of a Notice of Violation that includes a reasonable opportunity to remedy the identified violations. (Ed. Code, § 47607(g).) Section 11968.5.2(c) outlines the obligations of a charter school governing body once a Notice of Violation is received:

> Upon receipt of a Notice of Violation, the charter school's governing body, as described in the school's charter, if it chooses to respond, shall take the following actions:
>
> (1) Submit to the chartering authority a detailed, written response addressing each identified violation which shall include the refutation, remedial action taken, or proposed remedial action by the charter school specific to each alleged violation; the written response shall be due by the end of the remedy period identified in the Notice of Violation; and
>
> (2) Attach to its written response supporting evidence of the refutation, remedial action, or proposed remedial action, if any, including written reports, statements, and other appropriate documentation.

Per Section 11968.5.2(d), after conclusion of the reasonable opportunity to remedy period specified in the NOV, the chartering authority:

> [S]shall evaluate the response of the charter school's governing body as described in the school's charter response to the Notice of Violation and any supporting evidence, if submitted, and shall take one of the following actions:

> (1) If the chartering authority has substantial evidence that the charter school has failed to refute to the chartering authority's satisfaction, or remedy a violation identified in the Notice of Violation, continue revocation of the school's charter by issuing a Notice of Intent to Revoke to the charter school's governing body as described in the school's charter; or
>
> (2) Discontinue revocation of the school's charter and provide timely written notice of such action to the charter school's governing body as described in the school's charter.[2]

On a date no later than 30 days after providing the NIR, the chartering authority shall hold a public hearing in the normal course of business, on the issue of whether evidence exists to revoke the charter. No later than 30 days after the public hearing, the chartering authority shall issue a final decision to revoke or decline to revoke the charter, unless the chartering authority and the charter school agree to extend the issuance of the decision by an additional 30 days. (Ed. Code, § 47607(h); Section 11968.5.2(f).)

IV. NOTICE OF FACTS AND FINDINGS IN SUPPORT OF REVOCATION

The factual bases for issuance of this NIR are set forth below. The District incorporates all of the substantial evidence, including supporting documentation included in the NOV.

A. VIOLATIONS OF CHARTER

HCCS has committed the following material violations of the conditions, standards, or procedures set forth in the Charter and the MOU:

Violation of Charter – Grade Level Changes

1. District NOV Findings

Education Code section 47604(a)(4) provides in part: "After receiving approval of its petition, a charter school that proposes to expand operations to one or more additional sites or grade levels shall request a material revision to its charter and shall notify the chartering authority of those additional locations or grade levels."

HCCS' Charter only authorizes the Charter School to provide instruction to students in grades 1, 2, and 12. However, HCCS has operated and received state apportionment for students enrolled in grades 9 and 10 without submitting a material revision request, in violation of its Charter and Education Code section 47605(a)(4).

By correspondence dated August 28, 2024, HCCTS sent a letter to the District stating that HCCS had added grade 9 and 10 through a non-material revision to its Charter based on the approval of District staff on October 29, 2020. The District sent an inquiry to HCCTS on September 30, 2025, requesting

[2] If the chartering authority does not act, as specified in Section 11968.5.2(d), within 60 calendar days of the conclusion of the remedy period specified in the NOV, the revocation process is terminated and the NOV is void.

evidence to support HCCTS' statement that the District has approved the change in grades through non-material revision. The District reviewed the documentation provided by HCCTS and with correspondence dated February 3, 2025, the District informed the Charter School that it failed to notify the District before changing the approved grade levels. *(See NOV Exhibits A and B.)*

2. HCCS Response to NOV

In the HCCS Response, HCCTS acknowledges that Education Code section 47605(a)(4) makes clear that a charter school seeking to expand operations to additional sites or grade levels must submit a material revision to its charter and notify its authorizer, and that HCCTS did not submit a material revision when grade levels were changed beginning in the 2020–21 school year. HCCTS expresses regrets that this process was not followed in the past, and assures the District that under new leadership, HCCTS is committed to full compliance, clear communication, and a constructive working relationship with the District to ensure that changes moving forward are properly authorized and transparent.

To address this violation, HCCTS has submitted a material revision request to the District. HCCTS indicates that the proposed material revision is intended to fully align HCCS' charter with current practice, CDE guidance, and District oversight, and this issue will be fully resolved once the District Board approves the submitted material revision. HCCTS indicates that if the Board does not approve the material revision, HCCTS will comply by returning to the grade levels specified in HCCS' existing approved Charter.

3. District Analysis of HCCS Response and Findings

Staff Finding(s): Remedial Action Insufficiently Addresses this Violation

The remedial plan provided by HCCS is the material revision request submitted to the District on October 10, 2025. The late submission of the material revision, after the conclusion of the remedy period has significantly delayed the District's ability to conduct a comprehensive review before a recommendation must be made regarding this violation. As a result of the late submission, the District cannot make a determination regarding the material revision until the District Board meeting in January 2026.

While HCCTS asserts that it will align grades with what is reflected in the HCCS Charter, the Charter School is currently serving students in grades 9th, 10th, and 12th. The HCCS Response failed to provide any evidence or information as to how the Charter School will transition to approved grades in order to ensure compliance with the current Charter or to add 11th grade (should the material revision be approved). The HCCS Response failed to provide any plans, timelines, or actions that will be taken in order to transition from the current structure to the approved grade levels.

Assertions by HCCTS without sufficient evidence that changes will be made to ensure compliance do not demonstrate that corrective actions have been implemented or that compliance will be achieved. Accordingly, the District has determined that HCCS failed to refute or remedy this violation to the satisfaction of the District.

Violation of Charter – Location Changes

1. **District NOV Findings**

On or about January 23, 2024, the District and HCCTS agreed to the MOU Amendment No. 3 which included a list of approved locations for HCCS' charter school operations. The MOU Amendment No. 3 includes the express requirement for HCCS to submit a written request to the District if the "Charter School seeks to establish operations at one or more additional locations(s) or move any of its existing location(s), including satellite facilities or resource centers... " HCCS' enrollment reports submitted beginning with July 2024 through March 2025 reflect students enrolled at locations that are not reflected in the current MOU Amendment No. 3.

In addition, on October 3, 2024, October 17, 2024, and November 7, 2024, the HCCTS Board of Directors approved multiple locations for HCCS operations which are not included in the list of approved locations identified in MOU Amendment No. 3. The District has sent multiple communications regarding HCCTS' addition of locations without submitting a material revision request. In a Notice of Concern and Request for Information dated April 23, 2025, the District outlined specific steps that must be taken to address discrepancies and comply with MOU Amendment No. 3. To date, no material revision request has been submitted for these locations and HCCS continues to operate at these locations in violation of the MOU Amendment No. 3 and Education Code section 47605(a)(4). *(See NOV Exhibits A, C, and H.)*

Additionally, HCCTS failed to provide fully executed copies of lease agreements as requested in the District's April 23, 2025, Notice of Concern/Request for Information. As the chartering authority, the District is entitled to information and documentation regarding the Charter School's operations (Ed. Code, § 47604.3). The failure to timely provide such information interferes with the District's oversight obligations

2. **HCCS Response to NOV**

HCCTS acknowledges that the MOU Amendment No. 3 governs the approval and operation of HCCS facilities and makes clear that any new locations require District authorization through a material revision. HCCTS also acknowledges that in the past, locations were opened or relocated without first completing the formal material revision process required by the MOU, and that this was a failure of compliance, that HCCTS accepts responsibility for non-compliance.

In the HCCS Response HCCTS assures the District that it has since taken corrective steps, and that moving forward, HCCTS will strictly comply with the requirement to submit a material revision for any facility location change, ensuring that the District is fully informed and that all operations are authorized.

To address this violation, HCCTS has submitted a material revision request to the District. HCCTS indicates this issue will be fully resolved once the District Board approves the submitted material revision. If the Board does not approve certain sites, HCCTS indicates that it will immediately limit operations to District-approved locations.

3. **District Analysis of HCCS Response and Findings**

Staff Finding(s): Remedial Action Insufficiently Addresses this Violation

The remedial plan provided by HCCS is the submission of the material revision request on October 10, 2025. The late submission of the material revision, after the conclusion of the remedy period has significantly delayed the District's ability to conduct a comprehensive review before a recommendation must be made regarding the violation related to locations. As a result of the late submission, the District cannot make a determination regarding the material revision until the District Board meeting in January 2026.

While HCCS asserts that its actions were not intentional, the District's review of the record demonstrates that HCCS knowingly and willfully disregarded multiple Notices of Concern and District communications by repeatedly voting to approve and subsequently occupying new locations despite its receipt of directives and warnings from the District to the contrary.

Despite the assertion that HCCS will align its locations with the Charter, the Charter School is currently operating at locations that have not been approved by the District. In the HCCS Response, the Charter School has failed to provide any details regarding how the leases will be terminated for the locations or the corrective actions that will be taken to ensure continued compliance.

The HCCS Response failed to provide fully executed copies of lease agreements as requested in the District's April 23, 2025, Notice of Concern/Request for Information. The HCCS Response primarily consists of statements asserting that changes will be made after the District Board of Trustees makes a determination regarding the material revision. However, such assertions, without substantive evidence demonstrating actional plans for implementation or corrective action at the operational level, are insufficient to establish compliance or remedy the identified violations. Therefore, the District has determined that HCCS failed to refute or remedy this violation to the satisfaction of the District.

B. VIOLATIONS OF LAW

HCCS has committed the following violations of law:

Violation of Law – Failure to Submit Annual Independent Audit Report

1. District NOV Findings

Education Code section 47064.33(a) requires that all charter schools file certain periodic financial reports, including annual audits. Likewise, section 47064.33(b) recognizes the importance for the charting authority to rely on these and any other financial reports in carrying out its oversight duties and "monitoring the fiscal condition of [a] charter school." (Ed. Code, § 47064.33(b).) Additionally, Education Code section 47605(m) requires charter schools to, "...transmit a copy of its annual, independent financial audit report for the preceding fiscal year...to its chartering authority...by December 15 of each year." HCCTS requested an extension to the December 15, 2024, deadline for submitting its 2023-24 audit report. The District granted an extension until January 15, 2025, but HCCTS failed to meet this deadline.

On March 19, 2025, the District sent a Request for Information requiring HCCTS to submit the annual

independent financial audit report no later than March 31, 2025. When HCCTS failed to comply, the District sent a Notice of Concern to HCCTS dated April 7, 2025 and outlined a requirement for HCCTS to submit the annual report by April 18, 2025. A subsequent Notice of Concern was sent to HCCTS on April 24, 2025 requiring HCCTS to submit the report by May 5, 2025. To date HCCTS' audit report has not been submitted to the District. *(See NOV Exhibits D and H.)*

HCCS is in violation of Education Code sections 47604.33 and 47605, and its own Charter, for failing to complete and submit its 2023-24 annual independent audit report to the District. HCCS' failure to provide its annual audit report for 2023-24, hinders the District's ability to properly carry out its duties as charter authorizer to oversee the Charter School's operations and monitor its fiscal condition.

2. HCCS Response to NOV

HCCTS acknowledges that Education Code sections 47604.33 and 47605, as well as the HCCTS charter, require timely completion and submission of an annual independent audit report, and that the 2023–24 audit has not yet been submitted to the District and that multiple deadlines were missed. However, HCCTS asserts that the delay regarding the final audit report is outside its control and it has consistently provided documentation requested by the auditor Eide Bailly and followed up on promised delivery timelines as demonstrated in Exhibit J of its Response which details an extensive list of document requests fulfilled by HCCTS staff; and even though HCCTS and its legal counsel has formally demanded its completion and continue to press for immediate resolution, the final audit has not been received from Eide Bailly. HCCTS assures that it will provide the District with the completed audit report immediately upon its release by Eide Bailly.

HCCTS further assures that moving forward, it will ensure timely completion of audits by: “Holding vendors accountable through stricter contracts and oversight” and “Engaging with TRUSD earlier in the process to provide status updates and transparency.”

3. District Analysis of HCCS Response and Findings

Staff Finding(s): Remedial Action Insufficiently Addresses this Violation

While HCCTS asserts that its independent auditor Eide Bailly has not indicated any significant findings in the draft report for 2023-24, the District has identified additional violations of law that will need to be reviewed upon completion of the final audit report and will be addressed with HCCTS through the oversight process.

Exhibit H of the HCCS Response is a letter from HCCTS’ legal counsel to the audit firm of Eide Bailly, LLP. In this letter, HCCTS’ legal counsel acknowledges that “Highlands cannot cure the District’s Notice of Violation without the audit report”.

The District does not concur with HCCS’s position that the audit report delay is due solely to factors outside the Charter School’s control. Although HCCS attributes the delay, in part to technical errors and testing requirements arising from the California State Auditor’s review, the State Auditor’s report revealed multiple findings directly attributable to HCCS’ own governance and management practices. The District finds that the delay is a direct and foreseeable consequence of internal failures in governance, fiscal oversight, and academic accountability. The District agrees with the statement made by HCCTS’ legal counsel in Exhibit H of the HCCS Response which noted that this violation cannot be

cured without the final audit report. Therefore, the District has determined that HCCS failed to refute or remedy this violation to the satisfaction of the District.

Violation of Law – Failure to Track Minimum Instructional Minutes

1. **District NOV Findings**

Education Code 47612.5(e)(l) states: "For purposes of calculating average daily attendance for classroom-based instruction apportionments, at least 80 percent of the instructional time offered by the charter school shall be at the schoolsite, and the charter school shall require the attendance of all pupils for whom a classroom-based apportionment is claimed at the schoolsite for at least 80 percent of the minimum instructional time required... "

HCCS' average class sizes have far exceeded classroom capacity with averages as high as 227 students. As a result, and as observed by District representatives during site visits and noted as part of the 2024-25 Attendance Audit conducted by CFE Consultant Dennis Snelling, HCCS students were observed arriving and leaving continuously without intending to stay for instruction. It was also observed that students were routinely sent home with packets or instructed to attend only part of the instructional day due to limited classroom capacity. The District believes that these practices resulted in students receiving significantly less than 80% in- person instruction and demonstrates that the HCCS did not require attendance of all pupils. The District authorized 2024-25 Attendance Audit also noted that attendance records were discarded, thereby removing any documented evidence of student attendance, which is necessary to verify the accuracy of enrollment reported for ADA. The above demonstrates HCCS' violation of the law. *(See NOV Exhibit E.)*

2. **HCCS Response to NOV**

In the HCCS Response HCCTS outlines corrective actions it has taken to improve in the areas of attendance tracking and enforcement, including improved attendance policies, re-engagement strategies, and employee training to ensure students are re-engaged when there are attendance concerns, which HCCTS asserts fully cures any outstanding concern that the District could have relating to attendance going forward. HCCTS also explains that it has taken all steps necessary to pursue its appeals of apportionment findings with regard to the state audit period where it believes that it met all legal requirements. In conclusion, HCCTS represents that there is nothing more that it can do with regard to the audit appeals until such time as a decision is made by the Education Audit Appeals Panel ("EAAP").

3. **District Analysis of HCCS Response and Findings**

Staff Finding(s): Remedial Action Plan Insufficiently Addresses this Violation

While the HCCS Response references a pending decision from the Education Audit Appeal Panel regarding the State Auditor's Report, the District notes that the NOV neither cited nor relied upon any findings from the Auditor's Report. As outlined in the NOV, the District's conclusions were based on direct observations made during site visits and corroborating evidence identified in the District-commissioned Attendance Audit finalized in January 2025.

In Exhibit AI of the HCCS Response, HCCS included a student calendar for the 2025-26 school year. Many of the teacher work days and student minimum days were missing from the calendar. On October

8, 2025 the District sought clarification regarding the discrepancies. HCCTS apologized for the confusion and provided a second calendar, stating that the updated version was correct. A subsequent communication from HCCTS on October 13, 2025 provided a third calendar. HCCTS indicated that they had made another error and they were intending to bring the most recent (October 13) calendar to the HCCTS Board the following week. To-date, HCCTS has not provided the District with the final, HCCTS Board approved student calendar.

The HCCS Response indicates that the Charter School is partially relying on the decision made by the Education Audit Appeal Panel to fully cure and/or remedy this violation. Therefore, the District cannot make the determination that this violation has been remedied or cured without the final determination regarding the EAAP appeal.

Although the District acknowledges the level of detail in HCCS's Response and the reported efforts to increase student engagement, the core issue remains unresolved: students cannot be required to attend at least 80% of the time when classroom capacity does not accommodate all students listed on a teacher's roster. The HCCS Response failed to include documentation verifying classroom capacity, student-to-teacher ratios, or teacher rosters/records necessary to confirm that enrollment does not exceed facility limitations.

The NOV further cited observations of students being sent home with packets and others arriving and leaving intermittently without remaining for instruction. HCCS provided no evidence that these practices have been corrected, communicated to staff, or are being actively monitored for compliance. The District finds that the submission of revised Board Policies, absent corresponding evidence of implementation or oversight, is insufficient to demonstrate that corrective actions have occurred. Accordingly, HCCS's assertions remain unsupported by verifiable evidence. Therefore, the District has determined that HCCS failed to refute or remedy this violation to the satisfaction of the District.

Violation of Law – Credential Misassignments

1. **District NOV Findings**

Education Code section 47605(1) provides in part: "Teachers in charter schools shall hold the Commission on Teacher Credentialing certificate, permit, or other document required for the teacher's certificated assignment. These documents shall be maintained on file at the charter school and are subject to periodic inspection by the chartering authority."

HCCS has provided instruction to its students using teachers who do not hold the appropriate credential as required by the Education Code. In correspondence dated March 17, 2025, HCCTS represented that Nancy Mora, Credentials Technician from San Diego County Office of Education ("SDCOE"), provided them with a recommendation that the Adult Education Credentials would be the appropriate credential for HCCTS teachers of record in a general education K-12 assignment. The District inquired with the California Commission on Teacher Credentialing ("CTC") and in correspondence dated March 11, 2025, received clarification confirming that the SDCOE's interpretation was incorrect: "While the credential was not designed only for providing instruction in an adult setting like the Designated Subjects Adult Education teaching credential, both the Multiple Subject and Single Subject teaching credentials authorize teaching in classes for adults in the respective classroom settings... " HCCTS failed to seek guidance from the CTC regarding credential requirements, but instead relied on faulty information from

the Ms. Mora resulting in disallowed ADA. *(NOV Exhibit E.)*

2. HCCS Response to NOV

In the HCCS Response HCCTS acknowledges that all HCCS teachers must hold valid teaching credentials and that paraeducators should not serve as classroom teachers without them. HCCTS also acknowledges that, under prior practice, HCCTS relied on adult education credentials based on guidance previously received from outside agencies, but since that does not meet current expectations from CDE and CTC, they will take responsibility for correcting it.

The remedial measures outlined in the HCCS Response include the following actions beginning with the 2024–25 school year:

- HCCTS laid off teachers who did not hold the required credentials and re-staffed classes with appropriately credentialed teachers.
- *Credentialing Review*: Examined over 300 staff profiles and held 269 individual consultations with certificated staff to create personalized compliance pathways.
- *Support Systems*: Established a credentialing support team of staff and consultants; built a centralized credentialing database; and partnered with UMass Global to provide flexible, remote intern credential pathways, and are hiring mentor teachers.
- *Financial and Professional Support*: Adopted Board Policy 4112.3 to reimburse staff for exam fees and coursework; approved a K–12 Teacher Retention Incentive, and aligned hiring timelines with CTC testing windows and permit options.
- *Hiring Reforms*: Suspended instruction in July 2025 to allow time to re-staff with fully credentialed teachers before the school year, implemented structured hiring and rehire processes tied to credential readiness; and issued updated teacher agreements.
- *Governance Safeguards*: Adopted new board policies requiring all certificated staff to hold valid credentials at hire and renewal, mandating use of Frontline to track compliance, and prohibiting nepotism in hiring through Board Policy 4212.8.

HCCTS asserts that through these actions, it has corrected past practices and put in place systems that ensure all teachers moving forward will hold valid K–12 credentials, and committed to ongoing monitoring and support to keep HCCS fully compliant.

3. District Analysis of HCCS Response and Findings

Staff Finding(s): Remedial Actions Taken Sufficiently Addressed this Violation

HCCTS acknowledges responsibility for the past errors related to certificated teacher credential misassignments. HCCTS took action to correct the violation with significant staffing layoffs during the 2024-25 school year. The HCCS Response states that the Charter School agrees that all teachers must hold a valid teaching credential. The response included a list of steps that have already been taken.

The District's review of HCCTS' response, the evidence provided, and information collected through the annual oversight activities reflect clear and convincing evidence that HCCTS has changed staffing practices and reformed to comply with the law. The District staff have seen evidence that the HCCTS staff have become more knowledgeable about credentialing options to ensure compliance. HCCTS subsequent actions show a credible shift to K-12 appropriate credentialing. Therefore, the District has

been determined that HCCS remedied this violation to the satisfaction of the District.

Violation of Law – Violation of WIOA Exclusive Partnership Agreement

1. District NOV Findings

During its 2024-25 oversight review, the District discovered that HCCTS had allowed individuals who were not enrolled students to participate in its Career Technical Education ("CTE") Truck Driving program. This practice violates the legal requirement that instruction be provided exclusively in partnership with Workforce Innovation and Opportunity Act ("WIOA") programs.

According to HCCTS, this practice began in 2014 at the direction of a Board member, was supported by the Executive Director, and continued with Board approval through the 2024- 25 school year. The issue was previously raised during the 2018 FCMAT audit of HCCS. In a letter dated June 22, 2018, HCCTS asserted that Education Code sections 47612.l(a) and 47605.1 requires a charter school "provide instruction exclusively in partnership with WIOA," but does not require the charter school to "operate exclusively in partnership with" WIOA. While the District agrees with the interpretation of law as outlined by HCCTS in its letter dated June 22, 2018, the practice of providing instruction to non-students as part of HCCTS' partnership with the Volunteers of America, Local 185 Union, Sacramento County Sheriff Office, and the Sacramento Police Department, violates this agreement. *(See NOV Exhibits E and H.)*

2. HCCS Response to NOV

In the HCCS Response HCCTS acknowledges that past practices in the Truck Driving program violated the requirements of its WIOA partnership agreement, which stipulates that instruction must be provided exclusively in partnership with WIOA programs. Specifically, HCCTS acknowledges that beginning in 2014, and with the support of prior leadership, non-students were allowed to participate in the program through informal arrangements with outside organizations. HCCTS assures that under current leadership, this practice has been ended and the following corrective steps have been taken to ensure compliance including and fully cure the issue:

- A formal investigation was completed by the Director of HR in 2024–25.
- Disciplinary action was taken against an employee.
- A stop notice was issued in December 2024 prohibiting non-student participation.
- Between December 2024 and January 2025, Highlands discontinued informal partnerships with Local 185, the Sacramento Police Department, and the Sacramento County Sheriff's Office.
- On January 6, 2025, Highlands officially ended all non-student participation across programs.
- The Truck Driving program was suspended and will remain paused until Highlands can ensure full compliance with WIOA requirements, its charter, and the MOU.

3. District Analysis of HCCS Response and Findings

Staff Finding(s): Remedial Actions Taken Insufficiently Addressed this Violation

The HCCS Response acknowledges that prior practices violated the requirements of WIOA, which

mandates that instruction be provided exclusively in partnership with WIOA programs. In the HCCS Response, HCCTS restated actions taken prior to the issuance of the NOV and asserted a commitment to correcting past errors and ensuring future compliance. However, the three (3) exhibits submitted were identical to those previously provided to the District and did not offer any new or substantive evidence to refute or remedy the violation.

Due to the absence of additional supporting documentation, the District finds that this violation remains unremedied. Furthermore, the District notes material inconsistencies between statements provided by the CTE Instructor and representations made in the HCCS Response. Accordingly, the District has determined that HCCS failed to refute or remedy this violation to the satisfaction of the District.

C. FISCAL MISMANAGEMENT

HCCS has failed to meet generally accepted accounting principles, and/or engaged in fiscal mismanagement as follows:

HCCS Engaged in Fiscal Mismanagement – San Diego Administrative Location

1. District NOV Findings

As approved by the HCCTS Board of Directors on or about August 4, 2022, HCCTS secured a site at 406 9th Avenue, Suite 310, San Diego, CA 92101 ("San Diego site"). HCCTS represents that the San Diego site is used for administrative purposes despite having no students in or near the area. However, public records show the location is marketed as luxury office condominiums, with Suite 310 (HCCTS' suite) advertised as having a "dedicated balcony with unparalleled view of Petco Park" and being the highest priced suite among the listed units for this address at the purchase price amount of $725,000.

This costly expenditure of a public funds on an administrative condominium located nowhere near HCCS student locations constitutes fiscal mismanagement of public funds. *(See NOV Exhibits F and H.)*

2. HCCS Response to NOV

In the Response HCCTS acknowledges that the decision to lease a condominium office in San Diego was a misstep that does not align with our mission or our responsibility to ensure all expenditures directly benefit students, recognizes that this was poor judgment under prior leadership, and understands the District's concern that this constituted fiscal mismanagement.

HCCTS represents that it has since vacated the property and taken corrective steps to minimize the financial impact, including, engaged Newmark Realty on March 27, 2025, to sublease the space, revised the listing in June 2025, and remains prepared to accept any commercially reasonable offer. HCCTS expressed its committed to recouping as much value as possible and bringing this matter to resolution.

HCCTS also assures that moving forward, it has implemented stronger financial controls and multi-level approval processes to prevent similar errors and ensure that all facility and spending decisions are directly tied to student learning and educational service, reinforcing its commitment to fiscal responsibility, transparency, and compliance.

3. District Analysis of HCCS Response and Findings

Staff Finding(s): Remedial Actions Taken Insufficiently Addressed this Violation

The HCCS Response provides no evidence to support the assertion that the San Diego Site condominium has been vacated. While HCCTS has taken steps to minimize the financial impact, the lease remains active, and associated expenses continue. The District notes that considerable public funds were expended on a facility that has not been used to serve HCCTS students, and no evidence has been provided to demonstrate that these expenditures have been appropriately addressed, mitigated, or remedied. Although the District recognizes the actions taken to reduce ongoing costs, this violation remains unresolved. Therefore, the District has determined that HCCS failed to refute or remedy this violation to the satisfaction of the District.

HCCS Engaged in Fiscal Mismanagement – Marysville 2 Location

1. District NOV Findings

The "Marysville 2" site at 1431 C Street, Marysville, CA ("Marysville 2"), was identified by HCCTS in both Exhibit B of the approved MOU Amendment No. 3 and a December 29, 2023, site list as a location for HCCS Career Technical Education (CTE) programs. However, during a site visit on March 4, 2024, the District's representative confirmed the site is not an instructional facility but a baseball field and no students were enrolled at the site. Further investigation by the District revealed HCCTS donated $25,000 for upgrades to the field, including $12,500 to sponsor the Marysville Drakes, a privately operated professional baseball team. This use of public funds for a private sports team raises serious concerns about misuse of educational resources.

The District issued a Notice of Concern and request for information on Mach 14, 2024 regarding the baseball field. HCCTS replied on April 5, 2024 stating that the donation was a "sponsorship" and that HCCTS received benefits which were intended to "attract new students". The District issued additional Notices of Concern/Requests for information on June 17, 2024, August 15, 2024, October 1, 2024, and February 19, 2025. HCCTS responded to these communications on July 23, 2024, September 25, 2024, January 14, 2025, and March 21, 2025. HCCTS' January 14, 2025, letters included a copy of a termination agreement between HCCTS and the City of Marysville.

Per a termination agreement HCCTS and the City of Marysville terminated the lease effective November 30, 2024. However, the termination agreement obligates HCCTS to continue paying$33,639.80 in lease payments annually through April 30, 2026. Additionally, HCCTS sold publicly funded equipment (valued at $52,494.34) to the City of Marysville for $1.00 as outlined in the November 30 termination agreement. While HCCTS potentially has the option per the termination agreement to have the equipment returned if HCCTS leases the Marysville 2 property in the future, the option is subject to agreement by the City. The ongoing lease payments, the disposal of equipment at a nominal price, and the initial misrepresentation of the site's intended use constitutes fiscal mismanagement. *(See NOV Exhibit G.)*

2. HCCS Response to NOV

In the HCCS Response HCCTS acknowledges that the decision to open and lease the Marysville 2 site

under prior leadership was unsound and did not reflect appropriate planning or stewardship of public resources.

HCCTS explains: "In November 2024, Highlands reached a termination agreement with the City of Marysville that ended the lease early (Exhibit AR). While Highlands remains obligated to make lease payments through April 2026, this arrangement resulted in a net savings of approximately $88,000 compared to the original lease terms. The transfer of equipment for $1 was part of the inducement necessary to secure this early termination and avoid further taxpayer losses (Exhibit AS and Exhibit AT)."

HCCTS represents that this matter has been resolved to the fullest extent possible given the circumstances created under prior leadership, given the inability of current administration to prevent or unwind past decisions. HCCT asserts that all it can do at this time is to mitigate losses and resolve the matter as prudently as possible but assures that its current administration is committed to ensuring that all future facility decisions are grounded in sound strategic planning, tied directly to student benefit, and compliant with the requirements of MOU Amendment No. 3.

3. District Analysis of HCCS Response and Findings

Staff Finding(s): Remedial Actions Taken Insufficiently Addressed this Violation

The lease for the Marysville 2 property remains active through April 30, 2026. Therefore, this violation continues to be ongoing and unresolved. Despite vacating the premises, HCCTS remains financially obligated under the terms of the lease agreement for the Marysville 2 site, resulting in the continued expenditure of public funds for a facility that has never been utilized to serve students.

The District finds that funds expended on this property including, but not limited to, lease payments, utilities, equipment purchases, and a sponsorship/donation, represent an inappropriate use of public. The ongoing financial obligations associated with the lease, the disposal of equipment at a nominal price, and the initial misrepresentation of the site's intended use, collectively demonstrate a pattern of fiscal mismanagement and a failure to exercise appropriate stewardship of public funds. Therefore, the District has determined that HCCS failed to refute or remedy this violation to the satisfaction of the District.

V. CONCLUSION

The District Board has determined based on substantial evidence that HCCS has failed to refute to the District's satisfaction or remedy all the violations set forth in the NOV. Accordingly, the District Board hereby issues this **Notice of Intent to Revoke** to HCCTS as the governing body of HCCS.

PLEASE TAKE NOTICE that a public hearing regarding revocation of HCCS Charter will be held as follows:

Date:	**December 2, 2025**
Time:	**5:30 p.m.**
Location:	**Twin Rivers Unified School District** **5115 Dudley Blvd.** **McClellan Park, California**

The District Superintendent or designee shall send the Notice of Intent to Revoke to:

Highlands Community Charter and Technical Schools
Board of Directors
1333 Grand Ave.
Sacramento, CA 95838-3654

Exhibit J

Twin Rivers
UNIFIED SCHOOL DISTRICT

November 5, 2025

Board of Trustees

Basim Elkarra
President

Stacey Bastian
Vice President

Christine Jefferson
Clerk

Michael Baker
Member

Sharon Reichelt
Member

Rebecca Sandoval
Member

Sascha Vogt
Member

Superintendent
Steve Martinez, Ed.D.

To inspire each student to extraordinary achievement every day

VIA E-MAIL

Jonathan Raymond, Executive Director
Highlands Community Charter and Technical Schools
1333 Grand Ave.
Sacramento, CA 95838
Jonathan.Raymod@hccts.org

Highlands Community Charter and Technical Schools Board of Directors:
Sharon Rocco - silvr01@yahoo.com
Mary DeChance - Mary.Dechance@hccts.org
Mike Reid - Mike.Reid@hccts.org

RE: Notice of Intent to Revoke - California Innovative Career Academy

Dear HCCTS Board of Directors and Mr. Raymond:

I am writing to notify you that the Twin Rivers Unified School District ("District") Board of Trustees ("Board") at its meeting on November 4, 2025, unanimously approved issuing the enclosed Notice of Intent to Revoke to the California Innovative Career Academy ("CICA") pursuant to Education Code section 47607 and Title 5, section 11968.5.2, of the California Code of Regulations.

As specified in the Notice of Intent to Revoke, a public hearing will be held on December 2, 2025, regarding revocation of CICA's Charter. Should you desire to present at the public hearing and will have presentation materials, please contact Sharilyn Warta, District (sharilyn.warta@trusd.net) by no later than November 17, 2025, to coordinate the submission.

Sincerely,

Steve Martinez, Ed. D
Superintendent

cc: Dave Gordan, Sacramento County Superintendent of Schools (dgordon@scoe.net)

Enclosure: Notice of Intent to Revoke (CICA)

Physical Address: 5115 Dudley Blvd. • McClellan, CA 95652
Mailing Address: 3222 Winona Way • North Highlands, CA 95660
(916) 566-1600 • FAX (916) 566-1784 • www.trusd.net

NOTICE OF INTENT TO REVOKE
California Innovative Career Academy

This Notice of Intent to Revoke will be issued upon approval by the Twin Rivers Unified School District Board of Trustees

November 4, 2025

I. BACKGROUND

The Twin Rivers Unified School District ("District") Board of Trustees ("Board") initially approved the petition for the establishment of California Innovative Career Academy ("CICA" or "Charter School") in 2019. On or about June 25, 2019, the Board conditionally approved the petition for a five-year term from July 1, 2019, through June 30, 2024 ("Charter"). Pursuant to Education Code section 47607.4, CICA's Charter was automatically extended through June 30, 2027, by operation of law.

On or about January 16, 2020, the District and CICA entered into a Memorandum of Understanding ("MOU") to document the arrangement and agreement between the parties regarding CICA's program, operation, structure, and obligations. Subsequent amendments to the MOU approved by the Board extended its term through June 30, 2027. On or about January 23, 2024, the District and CICA agreed to Amendment No. 3 of the MOU ("MOU Amendment No. 3") among other things, confirming the District's authorization of specified locations CICA had established for charter school operations and makes other clarifications regarding the process for approval of any new facility locations, facility safety expectations, and supervisorial oversight.

MOU Amendment No. 3 provides in part:

> "The terms of the MOU are intended by the District and Charter School to become part of the standards and procedures set forth in the Charter School's Charter approved by the District ("Charter"). Along with the Charter, this MOU will govern the relationship between the District and the Charter School regarding the operation of the Charter School. To the extent the terms of the MOU is/are inconsistent with any terms of the Charter, the MOU shall control. In addition, if the Charter is silent on an issue addressed by the MOU, the MOU shall control. As such, any violation of MOU by Charter School that also constitutes grounds for revocation per Education Code section 47607 will be treated and enforced by the District in the same manner, subject to Education Code Section 47607 and applicable implementing regulations, as it would any other violation constituting a ground for revocation." [1](Emphasis added.)

CICA is operated and governed independently by Highlands Community Charter and Technical Schools ("HCCTS"), a California nonprofit public benefit corporation, and its Board of Directors.

Following multiple and varying requests for information and notices of concern over a twelve-month period, the District determined that HCCTS either failed to remedy multiple areas of concern despite its receipt of multiple information requests and notices of concern from the District or makes promises of

[1] "Charter School" as used in the MOU Amendment No. 3 collectively refers to Highlands Community Charter and Technical Schools and Highlands Community Charter School.

future improvements without offering viable plans that either have been implemented or are capable of being implemented by HCCTS. As a result and since the District viewed CICA's material violations of the conditions, standards, or procedures of its Charter and MOU, failure to meet generally accepted accounting principles, or engaged in fiscal mismanagement, and violations of law as grounds for revocation, the District determined that the point has been reached where it was necessary to initiate the first step in the formal revocation process contained in the Education Code, which is the issuance of a Notice of Violation per Education Code section 47607(g) and Title 5, Cal. Code of Regulations, section 11968.5.2, and at its meeting on June 17, 2025, recommended to the Board that it issue a Notice of Violation to CICA.

On June 17, 2025, the Board approved issuance of the recommended Notice of Violation ("NOV") to CICA pursuant to Education Code section 47607. In the NOV, the District identified CICAs violations and including all evidence relied upon by the District as Exhibits. The NOV also provided CICA with a reasonable opportunity to respond to and/or remedy the violations by September 26, 2025. The NOV documented specific factual findings and provided evidence to support each of the legal grounds for revocation. *(See NOV and its Exhibits A-H.)*

On September 26, 2025, HCCTS timely submitted its response ("CICA Response") to the NOV. However, the supporting evidence was not provided to the District until September 29, 2025. *(See CICA Response dated 9/26/26 and Exhibits A-BB.)*

II. NOTICE OF INTENT TO REVOKE

District staff have evaluated the CICA Response and all documentation produced by CICA. After conducting a thorough, objective, and data-driven review, District staff determined that CICA has sufficiently addressed one of the violations, but has failed to refute to the District's satisfaction, or remedy all of the violations identified in the NOV, and significant violations continue to exist, including material violations of the conditions, standards, or procedures of its charter, and violations of law. Consequently, District staff recommends that the Board issue this Notice of Intent to Revoke and notice of facts in support of revocation to CICA ("NIR") pursuant to Education Code section 47607 and Title 5, section 11968.5.2 of the California Code of Regulations ("Section 11968.5.2").

Upon the Board's determination that CICA failed to refute, take remedial action, or propose remedial action specific to each of the alleged violations of the Charter and law identified in the NOV, it will adopt and issue this NIR to CICA via the HCCTS Board of Directors based on the grounds for revocation set forth below:

1. CICA committed a material violation of the conditions, standards, or procedures set forth in the charter.
2. CICA violated any law.
3. Failed to meet generally accepted accounting principles, and/or engaged in fiscal mismanagement.

The findings below and substantial evidence in support of issuing the NIR to CICA conform to the standards and procedures of Education Code section 47607 and Section 11968.5.2. This report provides the District Board with a summary of the violations identified in the NOV, CICA's Response, and the District staff's analysis of CICA Response, and findings.

III. LEGAL AUTHORITY

Per Education Code section 47607(f):

> A charter may be revoked by the chartering authority if the chartering authority finds, through a showing of substantial evidence, that the charter school did any of the following:
>
> (1) Committed a material violation of any of the conditions, standards, or procedures set forth in the charter.
> (2) Failed to meet or pursue any of the pupil outcomes identified in the charter.
> (3) Failed to meet generally accepted accounting principles or engaged in fiscal mismanagement.
> (4) Violated any law.

A chartering authority commences the revocation process with the issuance of a Notice of Violation that includes a reasonable opportunity to remedy the identified violations. (Ed. Code § 47607(g).) Section 11968.5.2(c) outlines the obligations of a charter school governing body once a Notice of Violation is received:

> Upon receipt of a Notice of Violation, the charter school's governing body, as described in the school's charter, if it chooses to respond, shall take the following actions:
>
> (1) Submit to the chartering authority a detailed, written response addressing each identified violation which shall include the refutation, remedial action taken, or proposed remedial action by the charter school specific to each alleged violation; the written response shall be due by the end of the remedy period identified in the Notice of Violation; and
>
> (2) Attach to its written response supporting evidence of the refutation, remedial action, or proposed remedial action, if any, including written reports, statements, and other appropriate documentation.

Per Section 11968.5.2(d), after conclusion of the reasonable opportunity to remedy period specified in the NOV, the chartering authority:

> [S]shall evaluate the response of the charter school's governing body as described in the school's charter response to the Notice of Violation and any supporting evidence, if submitted, and shall take one of the following actions:
>
> (1) If the chartering authority has substantial evidence that the charter school has failed to refute to the chartering authority's satisfaction, or remedy a violation identified in the Notice of Violation, continue revocation of the school's charter by issuing a Notice of Intent to Revoke to the charter school's governing body as described in the school's charter; or

(2) Discontinue revocation of the school's charter and provide timely written notice of such action to the charter school's governing body as described in the school's charter.[2]

On a date no later than 30 days after providing the NIR, the chartering authority shall hold a public hearing in the normal course of business, on the issue of whether evidence exists to revoke the charter. No later than 30 days after the public hearing, the chartering authority shall issue a final decision to revoke or decline to revoke the charter, unless the chartering authority and the charter school agree to extend the issuance of the decision by an additional 30 days. (Ed. Code, § 47607(h); Section 11968.5.2(f).)

IV. NOTICE OF FACTS AND FINDINGS IN SUPPORT OF REVOCATION

The factual bases for issuance of this NIR are set forth below. The District incorporates all of the substantial evidence, including supporting documentation included in the NOV.

A. VIOLATIONS OF CHARTER

CICA has committed the following material violations of the conditions, standards, or procedures set forth in the Charter and the MOU:

Violation of Charter – Grade Level Changes

1. District NOV Findings

Education Code section 47604(a)(4) provides in part: "After receiving approval of its petition, a charter school that proposes to expand operations to one or more additional sites or grade levels shall request a material revision to its charter and shall notify the chartering authority of those additional locations or grade levels."

CICA's Charter only authorizes the Charter School to provide instruction to students in grades 1, 2, and 12. However, CICA enrolled students in grades 9 and 10 without submitting a material revision request, in violation of its Charter and Education Code section 47605(a)(4).

By correspondence dated August 28, 2024, HCCTS sent a letter to the District stating that CICA had added grade 9 and 10 through a non-material revision to its Charter based on the approval of District staff on October 29, 2020. The District sent an inquiry to HCCTS on September 30, 2025, requesting evidence to support HCCTS' statement the District has approved the change in grades through non-material revision. The District reviewed the documentation provided by CICA and with correspondence dated On February 3, 2025, the District informed the Charter School that it had failed to notify the District before changing the approved grade levels. *(See NOV Exhibits A and B.)*

[2] If the chartering authority does not act, as specified in Section 11968.5.2(d), within 60 calendar days of the conclusion of the remedy period specified in the NOV, the revocation process is terminated and the NOV is void.

2. CICA Response to NOV

In the CICA's Response, HCCTS acknowledges that Education Code section 47605(a)(4) makes clear that a charter school seeking to expand operations to additional sites or grade levels must submit a material revision to its charter and notify its authorizer, and that HCCTS did not submit a material revision when grade levels were changed beginning in the 2020–21 school year. HCCTS expresses regrets that this process was not followed in the past, and assures the District that under new leadership, HCCTS is committed to full compliance, clear communication, and a constructive working relationship with the District to ensure that changes moving forward are properly authorized and transparent.

To address this violation, HCCTS has submitted a material revision request to the District. HCCTS indicates that the proposed material revision is intended to fully align CICA's charter with current practice, CDE guidance, and District oversight, and this issue will be fully resolved once the District Board approves the submitted material revision. HCCTS indicates that if the Board does not approve the material revision, HCCTS will comply by returning to the grade levels specified in CICA's existing approved Charter.

3. District Analysis of CICA Response and Findings

Staff Finding(s): Remedial Action Insufficiently Addresses this Violation

The remedial plan provided by CICA is the material revision request submitted to the District on October 10, 2025. The late submission of the material revision, after the conclusion of the remedy period has significantly delayed the District's ability to conduct a comprehensive review before a recommendation must be made regarding this violation. As a result of the late submission, the District cannot make a determination regarding the material revision until the District Board meeting in January 2026.

While HCCTS asserts that it will align grades with what is reflected in the CICA Charter, the Charter School is currently serving students in grades 9th, 10th, and 12th. The CICA Response failed to provide any evidence or information as to how the Charter School will transition to approved grades in order to ensure compliance with the current Charter or to add 11th grade (should the material revision be approved). The CICA Response failed to provide any plans, timelines, or actions that will be taken in order to transition from the current structure to the approved grade levels.

Assertions by HCCTS without sufficient evidence that changes will be made to ensure compliance do not demonstrate that corrective actions have been implemented or that compliance will be achieved. Accordingly, the District has determined that CICA failed to refute or remedy this violation to the satisfaction of the District.

Violation of Charter – Location Changes

1. District NOV Findings

On or about January 23, 2024, the District and HCCTS agreed to the MOU Amendment No. 3 which included a list of approved locations for CICA's charter school operations. The MOU Amendment No. 3 includes the express requirement for CICA to submit a written request if the "Charter School seeks to establish operations at one or more additional locations(s) or move any of its existing location(s),

including satellite facilities or resource centers…" CICA's enrollment reports submitted beginning with July 2024 through March 2025 reflect students enrolled at locations that are not approved in MOU Amendment No. 3.

In addition, on October 3, 2024, October 17, 2024, and November 7, 2024 the HCCTS Board of Directors approved multiple locations for CICA operations which are not included in the list of approved locations identified MOU Amendment No. 3. The District has sent multiple communications regarding HCCTS' addition of locations without submitting a material revision request. In a Notice of Concern dated April 23, 2025, the District outlined specific steps that must be taken to address discrepancies and comply with MOU Amendment No. 3. To-date, no material revision request has been submitted for these locations and CICA continues to operate at these locations in violation of the MOU Amendment No. 3 and Education Code section 47605(a)(4). *(See NOV Exhibits A, C, and I.)*

Additionally, HCCTS has failed to provide fully executed copies of lease agreements as requested in the District's April 23, 2025, Notice of Concern/Request for Information. As the chartering authority, the District is entitled to information and documentation regarding the Charter School's operations (Ed. Code, § 47604.3). The failure to timely provide such information interferes with the District's oversight obligations

2. CICA Response to NOV

HCCTS acknowledges that the MOU Amendment No. 3 governs the approval and operation of CICA facilities and makes clear that any new locations require District authorization through a material revision. HCCTS also acknowledges that in the past, locations were opened or relocated without first completing the formal material revision process required by the MOU, and that this was a failure of compliance, that HCCTS accepts responsibility for non-compliance.

In the CICA Response HCCTS assures the District that it has since taken corrective steps, and that moving forward, HCCTS will strictly comply with the requirement to submit a material revision for any facility location change, ensuring that the District is fully informed and that all operations are authorized.

To address this violation, HCCTS has submitted a material revision request to the District. HCCTS indicates this issue will be fully resolved once the District Board approves the submitted material revision. If the Board does not approve certain sites, HCCTS indicates that it will immediately limit operations to District-approved locations.

3. District Analysis of CICA Response and Findings

Staff Finding(s): Remedial Action Insufficiently Addresses this Violation

The remedial plan provided by CICA is the submission of the material revision request on October 10, 2025. The late submission of the material revision, after the conclusion of the remedy period has significantly delayed the District's ability to conduct a comprehensive review before a recommendation must be made regarding the violation related to locations. As a result of the late submission, the District cannot make a determination regarding the material revision until the District Board meeting in January 2026.

While CICA asserts that its actions were not intentional, the District's review of the record demonstrates that CICA knowingly and willfully disregarded multiple Notices of Concern and District communications by repeatedly voting to approve and subsequently occupying new locations despite its receipt of directives and warnings from the District to the contrary.

Despite the assertion that CICA will align its locations with the Charter, the Charter School is currently operating at locations that have not been approved by the District. In the CICA Response, the Charter School has failed to provide any details regarding how the leases will be terminated for the locations no longer used by CICA or the corrective actions that will be taken to ensure continued compliance.

The CICA Response primarily consists of statements asserting that changes will be made after the District Board of Trustees makes a determination regarding the material revision. However, such assertions, without substantive evidence demonstrating actional plans for implementation or corrective action at the operational level, are insufficient to establish compliance or remedy the identified violations. Therefore, the District has determined that CICA failed to refute or remedy this violation to the satisfaction of the District.

B. VIOLATIONS OF LAW

CICA has committed the following violations of law:

Violation of Law – Failure to Submit Annual Independent Audit Report

1. District NOV Findings

Education Code section 47064.33(a) requires that all charter schools file certain periodic financial reports, including annual audits. Likewise, section 47064.33(b) recognizes the importance for the charting authority to rely on these and any other financial reports in carrying out its oversight duties and "monitoring the fiscal condition of [a] charter school." (Ed. Code, § 47064.33(b).) Additionally, Education Code § 47605(m) requires charter schools to, "...transmit a copy of its annual, independent financial audit report for the preceding fiscal year...to its chartering authority...by December 15 of each year."

On March 19, 2025, the District sent a Request for Information requiring HCCTS to submit the annual independent financial audit report no later than March 31, 2025. When HCCTS failed to comply, the District sent a Notice of Concern to HCCTS dated April 7, 2025 and outlined a requirement for HCCTS to submit the annual report by April 18, 2025. A subsequent Notice of Concern was sent to HCCTS on April 24, 2025 requiring HCCTS to submit the report by May 5, 2025. To date CICA's audit report has not been submitted to the District. *(See NOV Exhibits D and I.)*

CICA is in violation of Education Code sections 47604.33 and 47605, and its own Charter, for failing to complete and submit its 2023-24 annual independent audit report to the District. CICA's failure to provide its annual audit report for 2023-24, hinders the District's ability to properly carry out its duties as charter authorizer to oversee the Charter School's operations and monitor its fiscal condition.

2. CICA Response to NOV

HCCTS acknowledges that Education Code sections 47604.33 and 47605, as well as the HCCTS charter, require timely completion and submission of an annual independent audit report, and that the 2023–24 audit has not yet been submitted to the District and that multiple deadlines were missed. However, HCCTS asserts that the delay regarding the final audit report is outside its control and it has consistently provided documentation requested by the auditor Eide Bailly and followed up on promised delivery timelines as demonstrated in Exhibit J of its Response which details an extensive list of document requests fulfilled by HCCTS staff; and even though HCCTS and its legal counsel has formally demanded its completion and continue to press for immediate resolution, the final audit has not been received from Eide Bailly. HCCTS assures that it will provide the District with the completed audit report immediately upon its release by Eide Bailly.

HCCTS further assures that moving forward, it will ensure timely completion of audits by: "Holding vendors accountable through stricter contracts and oversight" and "Engaging with TRUSD earlier in the process to provide status updates and transparency."

3. District Analysis of CICA Response and Findings

Staff Finding(s): Remedial Action Insufficiently Addresses this Violation

While HCCTS asserts that its independent auditor Eide Bailly has not indicated any significant findings in the draft report for 2023-24, the District has identified additional violations of law that will need to be reviewed upon completion of the final audit report and will be addressed with HCCTS through the oversight process.

Exhibit H of the CICA Response is a letter from HCCTS' legal counsel to the audit firm of Eide Bailly, LLP. In this letter, HCCTS' legal counsel acknowledges that "Highlands cannot cure the District's Notice of Violation without the audit report".

The District does not concur with CICA's position that the audit report delay is due solely to factors outside the Charter School's control. Although CICA attributes the delay, in part to technical errors and testing requirements arising from the California State Auditor's review, the State Auditor's report revealed multiple findings directly attributable to CICA's own governance and management practices. The District finds that the delay is a direct and foreseeable consequence of internal failures in governance, fiscal oversight, and academic accountability. The District agrees with the statement made by HCCTS' legal counsel from Exhibit H of the CICA Response which noted that this violation cannot be cured without the final audit report. Therefore, the District has determined that CICA failed to refute or remedy this violation to the satisfaction of the District.

Violation of Law – Failure to Track Minimum Instructional Minutes

1. District NOV Findings

California Education Code 47612.5 mandates that charter schools provide a minimum number of annual instructional minutes equivalent to those required of traditional public schools. Before March 2025, CICA did not have a process or documentation to ensure compliance with minimum instructional minutes. On September 9, 2024, Melissa Roberson, Director of Accountability and Assessment, HCCTS stated "Due to the nature of independent study, CICA does not currently have an instructional minutes report."

By correspondence dated October 30, 2025, the District notified HCCTS that the requirement to meet minimum instructional minutes was outlined in Education Code 47612.5 and CICA's Charter, which states "CICA will maintain no less than the minimum number of instructional days and minutes required by the Education Code and/or the California Code of Regulations for each grade level served." In the October 30 correspondence, the District requested the documentation that CICA uses to ensure the minimum number of instructional days and minutes are being met.

HCCTS responded on November 26, 2024, and stated that while pacing guides had been created at the beginning of the 2023-24 year to ensure compliance with minimum instructional minutes, HCCTS had only recently submitted the pacing guides to their legal counsel to evaluate the documentation. HCCTS stated that they would "make any necessary adjustments" and provide the District with the information after they were presented to the HCCTS Board of Directors.

By correspondence dated February 19, 2025, the District requested an update regarding the original request regarding how CICA ensures that the minimum number of instructional days and minutes are being met. On March 24, 2025 HCCTS provided a 20-page response. The March 2025 response from HCCTS failed to adequately address the request and caused additional concerns as outlined below:

- Potential material changes to the instruction model to a Course-Based Independent Study delivery. This would require the HCCTS Board approval as outlined in Education Code 51749.5. If CICA has moved to a Course-Based Independent Study model the District does not believe the pacing guides contain all of the required information that the HCCTS Board of Directors would need to certify the minutes.

- The hours listed for each course are not totaled and, in some cases, do not meet minimum instructional minute requirements as outlined in Education Code 51747.5. Failure to include the total hours fails to provide the District with the originally requested information to outline how CICA ensures the minimum instructional minutes are being met.

- The documentation provided by CICA omitted any explanation for assignments during weeks that might have less than five school days and how the requirements are met for those weeks, which reflects an overall inadequate explanation with their pacing guides.

- HCCTS failed to explain if all students are required to carry a full workload, which is required information in order to determine whether the minimum instructional minutes are being met.

- The April 2025 documentation appears to have errors as some of the assignments show 7.24 hours while others show 7.25 hours. These errors include an issue with the English A course in which there are no time valuations for the "Guided Notes Completion" column. While this may be correct, there is no explanation regarding how this course would total 103.2 hours as represented by HCCTS.

- The District notes additional concerns with the English C and Pre-Algebra A for which total hours and an explanation for discrepancies would be required to fully show the minimum instructional minutes are being met.

- Upon review of the calendar which was attached to HCCTS March 2025 response, the District was unable to verify 204 days. The start date on the calendar is July 8, 2025, which would be

more than 204 days, however, the HCCTS May 15, 2025 Board meeting had a completely different calendar which indicates the first day of school as August 6, 2025.

The above demonstrates CICA's fiscal mismanagement and violation of the law. *(See NOV Exhibit E.)*

2. CICA Response to NOV

In the CICA Response HCCTS states that the Charter School meets instructional time requirements through documentation of student engagement, evaluation of work product, and offering both synchronous and asynchronous learning opportunities. The CICA Response also points to the pacing guides as the tool that offers teachers guidance to assign work and assess time-value for the work completed. CICA also notes that the non-classroom-based program with the independent study model allows room for teacher judgment on individual work product and the time-value that a teacher may deem appropriate. The Charter School also stated that the assignment work record supports with recording daily engagement an documentation of the time-value. The CICA Response indicated that the pacing guides constitute the general recommendations for time-value assignment and demonstrates that any student who is fully engages has ample opportunity to participate in the required instructional minutes. The CICA response also included a student calendar.

3. District Analysis of CICA Response and Findings

Staff Finding(s): Remedial Action Plan Insufficiently Addresses this Violation

The District's review of the evidence provided revealed multiple deficiencies in the pacing guides and related documentation. Specifically, the pacing guides lack clarity regarding instructional sequence and expectations, and there is insufficient information describing how time values are determined for assignments or instructional activities. Additionally, the methods used to evaluate and score student work are not clearly defined, making it impossible to verify whether students are meeting stated learning objectives.

In Exhibit X of the CICA Response, CICA included a student calendar for the 2025-26 school year. Many of the teacher work days and student minimum days were missing from the calendar. On October 8, 2025 the District sought clarification regarding the discrepancies. HCCTS apologized for the confusion and provided a second calendar, stating that the updated version was correct. A subsequent communication from HCCTS on October 13, 2025 provided a third calendar. HCCTS indicated that they had made another error and they were intending to bring the most recent (October 13) calendar to the HCCTS Board the following week. To-date, HCCTS has not provided the District with the final, HCCTS Board approved student calendar.

The District also identified ongoing concerns with student agreements, including the absence of versions provided in the student's primary language and a general lack of clarity in the content of the agreements. Therefore, the District has determined that CICA failed to refute or remedy this violation to the satisfaction of the District.

Violation of Law – Credential Misassignments

1. District NOV Findings

Education Code section 47605(l) provides in part: "Teachers in charter schools shall hold the Commission on Teacher Credentialing certificate, permit, or other document required for the teacher's certificated assignment. These documents shall be maintained on file at the charter school and are subject to periodic inspection by the chartering authority."

HCCTS has provided instruction to its students using teachers who do not hold the appropriate credential as required by the Education Code. In correspondence dated March 17, 2025, HCCTS represented that Nancy Mora, Credentials Technician from San Diego County Office of Education ("SDCOE"), provided them with a recommendation that the Adult Education Credentials would be the appropriate credential for HCCTS teachers of record in a general education K-12 assignment. The District inquired with the California Commission on Teacher Credentialing ("CTC") and in correspondence dated March 11, 2025, received clarification confirming that the SDCOE's interpretation was incorrect: "While the credential was not designed only for providing instruction in an adult setting like the Designated Subjects Adult Education teaching credential, both the Multiple Subject and Single Subject teaching credentials authorize teaching in classes for adults in the respective classroom settings…" HCCTS failed to seek guidance from the CTC regarding credential requirements, but instead relied on faulty information from the Ms. Mora resulting in disallowed ADA. (*See NOV Exhibit G.*)

2. CICA Response to NOV

In the CICA Response HCCTS acknowledges that all CICA teachers must hold valid teaching credentials and that paraeducators should not serve as classroom teachers without them. HCCTS also acknowledges that, under prior practice, HCCTS relied on adult education credentials based on guidance previously received from outside agencies, but since that does not meet current expectations from CDE and CTC, they will take responsibility for correcting it.
The remedial measures outlined in the CICA Response include the following actions beginning with the 2024–25 school year:

- HCCTS laid off teachers who did not hold the required credentials and re-staffed classes with appropriately credentialed teachers.
- *Credentialing Review*: Examined over 300 staff profiles and held 269 individual consultations with certificated staff to create personalized compliance pathways.
- *Support Systems*: Established a credentialing support team of staff and consultants; built a centralized credentialing database; and partnered with UMass Global to provide flexible, remote intern credential pathways, and are hiring mentor teachers.
- *Financial and Professional Support*: Adopted Board Policy 4112.3 to reimburse staff for exam fees and coursework; approved a K–12 Teacher Retention Incentive, and aligned hiring timelines with CTC testing windows and permit options.
- *Hiring Reforms*: Suspended instruction in July 2025 to allow time to re-staff with fully credentialed teachers before the school year, implemented structured hiring and rehire processes tied to credential readiness; and issued updated teacher agreements.
- *Governance Safeguards*: Adopted new board policies requiring all certificated staff to hold valid credentials at hire and renewal, mandating use of Frontline to track compliance, and prohibiting nepotism in hiring through Board Policy 4212.8.

HCCTS asserts that through these actions, it has corrected past practices and put in place systems that ensure all teachers moving forward will hold valid K–12 credentials, and committed to ongoing monitoring and support to keep CICA fully compliant.

3. District Analysis of CICA Response and Findings

Staff Finding(s): Remedial Actions Taken Sufficiently Addressed this Violation

HCCTS acknowledges responsibility for the past errors related to certificated teacher credential misassignments. HCCTS took action to correct the violation with significant staffing layoffs during the 2024-25 school year. The CICA Response states that the Charter School agrees that all teachers must hold a valid teaching credential. The response included a list of steps that have already been taken.

The District's review of HCCTS' response, the evidence provided, and information collected through the annual oversight activities reflect clear and convincing evidence that HCCTS has changed staffing practices and reformed to comply with the law. The District staff have seen evidence that the HCCTS staff have become more knowledgeable about credentialing options to ensure compliance. HCCTS subsequent actions show a credible shift to K-12 appropriate credentialing. Therefore, the District has been determined that CICA remedied this violation to the satisfaction of the District.

Violation of Law – Violation of WIOA Exclusive Partnership Agreement

1. District NOV Findings

During its 2024–25 oversight review, the District discovered that HCCTS had allowed individuals who were not enrolled students to participate in its Career Technical Education ("CTE") Truck Driving program. This practice violates the legal requirement that instruction be provided exclusively in partnership with Workforce Innovation and Opportunity Act ("WIOA") programs.

According to HCCTS, this practice began in 2014 at the direction of a Board member, was supported by the Executive Director, and continued with Board approval through the 2024–25 school year. The issue was previously raised during the 2018 FCMAT audit of HCCTS. In a letter dated June 22, 2018, HCCTS asserted that Education Code sections 47612.1(a) and 47605.1 requires a charter school "provide instruction exclusively in partnership with WIOA," but does not require the charter school to "operate exclusively in partnership with" WIOA. While the District agrees with the interpretation of law as outlined by HCCTS in its letter dated June 22, 2024, the practice of providing instruction to non-students as part of HCCTS' partnership with the Volunteers of America, Local 185 Union, Sacramento County Sheriff's Office, and the Sacramento Police Department, violates this agreement. *(See NOV Exhibit H.)*

2. CICA Response to NOV

In the CICA Response HCCTS acknowledges that past practices in the Truck Driving program violated the requirements of its WIOA partnership agreement, which stipulates that instruction must be provided exclusively in partnership with WIOA programs. Specifically, HCCTS acknowledges that beginning in 2014, and with the support of prior leadership, non-students were allowed to participate in the program through informal arrangements with outside organizations. HCCTS assures that under current leadership, this practice has been ended and the following corrective steps have been taken to ensure compliance including and fully cure the issue:

- A formal investigation was completed by the Director of HR in 2024–25.
- Disciplinary action was taken against an employee.

- A stop notice was issued in December 2024 prohibiting non-student participation.
- Between December 2024 and January 2025, Highlands discontinued informal partnerships with Local 185, the Sacramento Police Department, and the Sacramento County Sheriff's Office.
- On January 6, 2025, Highlands officially ended all non-student participation across programs.
- The Truck Driving program was suspended and will remain paused until Highlands can ensure full compliance with WIOA requirements, its charter, and the MOU.

3. District Analysis of CICA Response and Findings

Staff Finding(s): Remedial Actions Taken Insufficiently Addressed this Violation

The CICA Response acknowledges that prior practices violated the requirements of the WIOA, which mandates that instruction be provided exclusively in partnership with WIOA programs. In the CICA Response, HCCTS restated actions taken prior to the issuance of the NOV and asserted a commitment to correcting past errors and ensuring future compliance. However, the three (3) exhibits submitted were identical to those previously provided to the District and did not offer any new or substantive evidence to refute or remedy the violation.

Due to the absence of additional supporting documentation, the District finds that this violation remains unremedied. Furthermore, the District notes material inconsistencies between statements provided by the CTE Instructor and representations made in the CICA Response. Accordingly, the District has determined that CICA failed to refute or remedy this violation to the satisfaction of the District.

C. FISCAL MISMANAGEMENT

CICA has failed to meet generally accepted accounting principles, and/or engaged in fiscal mismanagement as follows:

CICA Engaged in Fiscal Mismanagement – San Diego Administrative Location

1. District NOV Findings

As approved by the HCCTS Board of Directors on or about August 4, 2022, HCCTS secured a site at 406 9th Avenue, Suite 310, San Diego, CA 92101 ("San Diego site"), HCCTS represents that the San Diego site is used for administrative purposes despite having no students in or near the area. However, public records show the location is marketed as luxury office condominiums, with Suite 310 (HCCTS' suite) advertised as having a "dedicated balcony with unparalleled view of Petco Park" and being the highest priced suite among the listed units for this address at the purchase price amount of $725,000.

MOU Amendment No. 3 does not include the San Diego location as an administrative site for CICA. However, on October 3, 2024 and November 17, 2024 HCCTS' Board of Directors adopted the location as an Admin Facility for both HCCS and CICA.

This costly expenditure of a public funds on an administrative condominium located nowhere near CICA student locations constitutes fiscal mismanagement of public funds. *(See NOV Exhibits F and I.)*

2. CICA Response to NOV

In the Response HCCTS acknowledges that the decision to lease a condominium office in San Diego was a misstep that does not align with our mission or our responsibility to ensure all expenditures directly benefit students, recognizes that this was poor judgment under prior leadership, and understands the District's concern that this constituted fiscal mismanagement.

HCCTS represents that it has since vacated the property and taken corrective steps to minimize the financial impact, including, engaged Newmark Realty on March 27, 2025, to sublease the space, revised the listing in June 2025, and remains prepared to accept any commercially reasonable offer. HCCTS expressed its committed to recouping as much value as possible and bringing this matter to resolution.

HCCTS also assures that moving forward, it has implemented stronger financial controls and multi-level approval processes to prevent similar errors and ensure that all facility and spending decisions are directly tied to student learning and educational service, reinforcing its commitment to fiscal responsibility, transparency, and compliance.

3. District Analysis of CICA Response and Findings

Staff Finding(s): Remedial Actions Taken Insufficiently Addressed this Violation

The CICA Response provides no evidence to support the assertion that the San Diego Site condominium has been vacated. While HCCTS has taken steps to minimize the financial impact, the lease remains active, and associated expenses continue. The District notes that considerable public funds were expended on a facility that has not been used to serve HCCTS students, and no evidence has been provided to demonstrate that these expenditures have been appropriately addressed, mitigated, or remedied. Although the District recognizes the actions taken to reduce ongoing costs, this violation remains unresolved. Therefore, the District has determined that CICA failed to refute or remedy this violation to the satisfaction of the District.

V. CONCLUSION

The District Board has determined based on substantial evidence that CICA has failed to refute to the District's satisfaction or remedy all the violations set forth in the NOV. Accordingly, the District Board hereby issues this **Notice of Intent to Revoke** to HCCTS as the governing body of CICA.

PLEASE TAKE NOTICE that a public hearing regarding revocation of CICA Charter will be held as follows:

Date:	**December 2, 2025**
Time:	**5:30 p.m.**
Location:	**Twin Rivers Unified School District** **5115 Dudley Blvd.** **McClellan Park, California**

The District Superintendent or designee shall send the Notice of Intent to Revoke to:

Highlands Community Charter and Technical Schools
Board of Directors

1333 Grand Ave.
Sacramento, CA 95838-3654

Exhibit K

Special and Virtual School Board Meeting
01/30/2026 - 12:00 PM
Twin Rivers Unified School District
5115 Dudley Blvd., Bay A, McClellan Park, CA 95652
https://bit.ly/TRUSDYouTube

MEETING MINUTES

Virtual/Livestream Participation:

Our school board meetings will be livestreamed on the Twin Rivers YouTube channel on the day of the board meeting. The video will be launched live five minutes prior to the meeting. The public will be able to provide live comments in a virtual formation for items listed on the Special Board meeting agenda. Please see Instructions for Leaving Public Comment for directions to pre-register to make a live-stream comment. Comments must be submitted by 11:00 A.M. Your comments will be considered at the appropriate time on the agenda.

In-Person Participation:

Members of the public may attend in-person and provide public comment on agenda items listed on the Special Board Meeting agenda by submitting a green public by 12:00 P.M. for Open Session items.

Please Note: If you need a disability-related modification or accommodation, including auxiliary aids or services, to participate in the public meeting, please contact the Superintendent's Office at (916) 566-1745 at least 24 hours before the scheduled Board meeting. [Government Code §54954.2] [Americans with Disabilities Act of 1990, §202.]

The board meeting agenda and supporting documents are available for review on the Twin Rivers Unified School District GAMUT Meetings website. An audio recording of board meetings may be made. Noted on the agenda are approximate times. The Board may adjust the time or sequence of agenda items during the meeting. Regular board meetings shall be adjourned by 10:30 P.M. unless extended to a specific time determined by a majority of the Board. The meeting shall be extended no more than once and subsequently may be adjourned to a later date (Board Bylaw 9323). Presentations will not be accepted from members of the public at board meetings without prior approval by the Superintendent or Board of Trustees.

Translations of board meetings or interpretations at board meetings will be provided by qualified interpreters and are available upon request. To request these translation/interpretation services, please contact the English Learner Services Department at (916) 566-1600, ext. 33419.

Attendance

Voting Members
Christine Jefferson, Board President
Rebecca Sandoval, Board Vice President
Sascha Vogt, Clerk
Michael Baker, Board Member
Stacey Bastian, Board Member
Basim Elkarra, Board Member

Sharon Reichelt, Board Member

Administration Present: Steve Martinez, Ed. D., Superintendent; Gina Carreon, J.D., Chief Human Resources Official; Ryan DiGiulio, Chief Business Official; Marci Bernard, Associate Superintendent, School Leadership.

A. 12:00 P.M. CALL TO ORDER by the President

President Christine Jefferson called the Special and Virtual School Board meeting to order at 12:01 p.m.

1. Introduction of Interpreters

The following interpreters introduced themselves: Laura Orozco, Spanish interpreter.

2. Pledge of Allegiance Led by Trustee Sascha Vogt

Trustee Elkarra led the Pledge of Allegiance.

B. PRESENT/DISCUSS/ACTION - SCHOOL/STAFF

1. ADOPT Resolution No. 1612 Approving Issuance of a Final Decision to Revoke the Charter of California Innovative Career Academy

A motion was made to adopt Resolution No. 1612 Approving Issuance of a Final Decision to Revoke the Charter of California Innovative Career Academy.

Motion made by: Michael Baker
Motion seconded by: Rebecca Sandoval

> ***Voting results:*** Unanimously approved
> Yes: Christine Jefferson
> Yes: Rebecca Sandoval
> Yes: Sascha Vogt
> Yes: Michael Baker
> Yes: Stacey Bastian
> Yes: Basim Elkarra
> Yes: Sharon Reichelt

Motion passed by majority vote: 7 - Yes, 0 - No, 0 - Abstain, 0 - Absent

Ryan DiGiulio stated that at the prior meeting, the Board took action resulting in the decision to move forward with charter revocation. This resolution formally memorialize the Board's decision to revoke CICA's charter.
Teresa Cummings, Deputy Director and Chief Operating Officer for Highlands Community Charter and Technical Schools, addressed the Board regarding the proposed revocation, stating that all staff-requested documentation had been provided and that all Notice of

Violation issues had been cured or refuted. She reported that WASC granted the school a six-year accreditation and that the school is nearing a “fully implemented” report from the State Auditor. She requested additional time and expressed willingness to continue collaborating with the Board and staff.

Araceli Perez addressed the Board acknowledging past audit findings, and emphasized the importance of adult education for underserved residents. She requested increased District investment in Twin Rivers Adult School, including expanded vocational programs for English learners.

Ryan DiGiulio clarified that the motion before the Board was to revoke the CICA’s charter, stating that a “yes” vote would approve revocation, while a “no” vote would decline revocation.

2. ADOPT Resolution No. 1613 Approving Issuance of a Final Decision to Revoke the Charter of Highlands Community Charter School

A motion was made to adopt Resolution No. 1613 Approving Issuance of a Final Decision to Revoke the Charter of Highlands Community Charter School

Motion made by: Michael Baker

Motion seconded by: Rebecca Sandoval

> ***Voting results:*** Unanimously approved
> Yes: Christine Jefferson
> Yes: Rebecca Sandoval
> Yes: Sascha Vogt
> Yes: Michael Baker
> Yes: Stacey Bastian
> Yes: Basim Elkarra
> Yes: Sharon Reichelt

Motion passed by majority vote: 7 - Yes, 0 - No, 0 - Abstain, 0 - Absent

Teresa Cummings, Deputy Director and Chief Operating Officer for Highlands Community Charter and Technical Schools, informed Board President Jefferson, Superintendent Martinez, and the Board of Trustees that WASC recently granted the school a six-year accreditation, cited progress toward full implementation of State Auditor recommendations, and requested that the Board not revoke the charter while expressing appreciation and willingness to continue collaborating with staff.

C. ANNOUNCEMENT OF NEXT MEETING

The Board of Trustees is scheduled to meet again, unless otherwise announced and approved by the Board of Trustees, on Wednesday, February 11, 2026, for a Regular In-Person/Virtual School Board Meeting at 6:00 p.m. (closed session) and 7:00 p.m. (public session) to be held in person at 5115 Dudley Boulevard, Bay A, McClellan Park, CA 95652 and live stream on

the Twin Rivers YouTube channel.

D. ADJOURN

There being no further business of the Board, President Jefferson adjourned the meeting at 12:12 p.m.

E. January 30, 2026, MULTILINGUAL AGENDA

NOTE: The agenda for the January 30, 2026, Special and Virtual School Board meeting was posted and provided in English and Spanish.

Clerk of the Board

Exhibit L

Sacramento County Office of Education

Tuesday, May 19, 2026

BOARD OF EDUCATION MEETING

*****REVISED AGENDA*****

WATCH VIDEO RECORDING

REGULAR SESSION: 6:30 P.M.

LOCATION:
David P. Meaney Education Center
10474 Mather Boulevard
Mather, CA 95655
Zoom Location: 6823 Pera Drive, Rancho Murietta, CA 95683

The meeting may also be observed via Zoom video and/or teleconference.

To view the meeting by computer, tablet, or smart phone, go to:
https://scoe.zoom.us/j/94507538412

To listen by phone: Primary Number: 669-900-6833, Secondary Number: 346-248-7799

Enter Meeting ID: 945 0753 8412

Accommodating Individuals with Special Needs
The Sacramento County Office of Education encourages those with disabilities to participate fully in the public meeting process. If you need a disability-related modification or accommodation, including auxiliary aids or services, to participate in the public meeting, contact the Superintendent's Office at (916) 228-2410 or wwatson@scoe.net at least 48 hours before the scheduled Board meeting so that we may make every reasonable effort to accommodate you. [Government Code § 54953.2; Americans with Disabilities Act of 1990, § 202 (42 U.S.C. § 12132).]

The Mission of the Sacramento County Office of Education (SCOE) is to provide leadership, build partnerships, and implement innovative programs and policies that ensure opportunity and access to empowering educational experiences for each and every learner.

1. **Call to Order and Roll Call**
2. **Pledge of Allegiance**
3. **Land Acknowledgement**
4. **Visitor Presentations**

A. **Public Comment**

Anyone may appear at the Board meeting to provide public comment regarding any item on the agenda or regarding any matter that is within the Board's subject matter jurisdiction. However, the Board may not take action on any item not on the agenda except as authorized by Government Code section 54954.2. If possible, notify the Board President or Board Secretary in writing prior to the meeting if you wish to testify.

Individuals wishing to speak in person before the Board are requested to complete a public comment form. Speakers will be called in the order in which the cards are received.

Public comment via Zoom teleconference may be made by using the raised hand feature in Zoom during the agenda item to be addressed. The speaker will be identified by their Display Name in Zoom when called upon to speak. Those joining the meeting via Zoom are requested to display their full name so there is no confusion when called upon to speak. Public comments will be received until the public comment period has elapsed.

Comments are limited to a maximum of two (2) minutes per speaker per agenda item, and individuals are limited to a single comment per agenda item.

Please contact contactscoe@scoe.net before the meeting if you have any questions about the public comment process.

B. **Employee Organizations**

5. Approval of Minutes

A. **No Minutes**

6. Adoption of Agenda

7. Official Correspondence

8. Superintendent's Report

A. **Superintendent's Report**

B. **SCOE 2026 Classified School Employee of the Year - Xanthi Soriano**
BACKGROUND:

Teagan Hackbarth, Transition Specialist at El Centro Jr./Sr. High School, is the Sacramento County Office of Education’s 2026 Classified School Employee of the Year. As one of the first people students meet, Teagan creates a welcoming space where they feel respected and ready to engage. She supports students with résumés, job applications, college and FAFSA forms, and connections to needed services. She also reaches beyond campus through home visits and direct support to families. Teagan developed the ROADS program to guide students through career exploration, skill-building, and postsecondary planning. She also strengthens the staff community by recognizing colleagues, celebrating milestones, and bringing people together. Her approach builds trust, improves morale, and strengthens the team while helping students gain direction and

confidence in a school environment where both students and staff feel supported.

RECOMMENDED ACTION: The Superintendent recommends that the Sacramento County Board of Education approve commendation of Teagan Hackbarth as the Sacramento County Office of Education 2026 Classified School Employee of the Year and that the Board present her with a plaque commemorating this honor.

9. New Business - Charter Schools

A. **NOTICE OF PUBLIC HEARING, Discussion, and Action on California Innovative Career Academy Charter Revocation Appeal - Teresa Stinson**

A public hearing will be held on May 19, 2026, to review and consider the California Innovative Career Academy's (CICA) appeal of its charter revocation. The hearing will be held at the Sacramento County Office of Education located at 10474 Mather Boulevard in Mather, California during the Sacramento County Board of Education's regular meeting, which is scheduled to commence at 6:30 p.m. At the conclusion of the hearing, the Board may take action on CICA's charter revocation appeal.

BACKGROUND:

On January 30, 2026, the Twin Rivers Unified School District (District) Board of Trustees revoked the charter of the CICA. On February 27, 2026, CICA submitted a timely charter revocation appeal to the Sacramento County Board of Education (County Board).

The CICA charter revocation appeal and accompanying documents are available for viewing at the following link:

https://scoenet-my.sharepoint.com/:f:/g/personal/mylah_vargas_scoe_net/IgA-dsOxK8kBT6YR89m_CRVTAd8DKlQsqyzlvd_ado9Mn54

Personally identifiable information (i.e., student names, student ID numbers, and contact information) have been redacted from the appeal documents. The documents also include written arguments submitted by CICA and the District on April 21, 2026 in response to the Sacramento County Office of Education's invitation.

POTENTIAL OUTCOMES:

The Education Code identifies three potential outcomes for charter revocation appeals:

- The County Board "may reverse the revocation decision if the county board of education determines that the findings made by the chartering authority under subdivision (h) are not supported by substantial evidence." (Ed. Code, § 47607, subd. (i)(2).)
- The County Board may affirm the revocation if it finds that the findings of the District Board are supported by substantial evidence. (Ed. Code, § 47607, subd. (i)(2).)
- If the County Board does not issue a decision on the appeal within 90 days of receipt, the Charter School may appeal the revocation to the State Board of Education (SBE). (Ed. Code, § 47607, subd. (i)(3).) If the County Board

does not issue a decision within 90 days, the District's decision is upheld, pending any further appeal. (Cal. Code Regs., tit. 5, § 11968.5.4, subd. (b).)

If the County Board upholds the revocation or does not issue a decision on the appeal, the Charter School may appeal to the SBE. If the County Board reverses the revocation, the District may appeal to the SBE. (Ed. Code, § 47607, subds. (i)(2), (3).)

If the County Board (without further appeal) or SBE reverse the revocation, the Charter School would return to authorization by the District. (Ed. Code, § 47607, subd. (k).)

The Sacramento County Office of Education (SCOE) Analysis of the CICA charter revocation appeal is attached.

Following the public hearing and review and consideration of the CICA appeal and SCOE Analysis, the Board may take action on CICA's charter revocation appeal. Proposed Resolutions are attached for the Board's consideration.

FINAL_SCOE Analysis HCCS CICA Charter Revocation Appeals_05-06-26.pdf

Proposed Res. No. 26-16A Affirming the TRUSD Board of Trustees' Decision to Revoke the CICA.pdf

Proposed Res. No. 26-16B Reversing the TRUSD Board of Trustees' Decision to Revoke the CICA.pdf

RECOMMENDED ACTION: The Superintendent recommends that the County Board conduct a public hearing and review and consider the California Innovative Career Academy charter revocation appeal and SCOE's Analysis and consider taking action on the revocation appeal.

B. **NOTICE OF PUBLIC HEARING, Discussion, and Action on Highlands Community Charter School Revocation Appeal - Teresa Stinson**

A public hearing will be held on May 19, 2026, to review and consider the Highlands Community Charter School's (HCCS) appeal of its charter revocation. The hearing will be held at the Sacramento County Office of Education located at 10474 Mather Boulevard in Mather, California during the Sacramento County Board of Education's regular meeting, which is scheduled to commence at 6:30 p.m. At the conclusion of the hearing, the Board may take action on HCCS's charter revocation appeal.

BACKGROUND:

On January 30, 2026, the Twin Rivers Unified School District (District) Board of Trustees revoked the charter of the HCCS. On February 27, 2026, HCCS submitted a timely charter revocation appeal to the Sacramento County Board of Education (County Board).

The HCCS charter revocation appeal and accompanying documents are available for viewing at the following link:

https://scoenet-my.sharepoint.com/:f:/g/personal/mylah_vargas_scoe_net/IgDswDdrUlcnQpFGMv

PxA8j3AesjosS6e-laPMpA27sG-RY

Personally identifiable information (i.e., student names, student ID numbers, and contact information) have been redacted from the appeal documents. The documents also include written arguments submitted by HCCS and the District on April 21, 2026, in response to the Sacramento County Office of Education's invitation.

POTENTIAL OUTCOMES:

The Education Code identifies three potential outcomes for charter revocation appeals:

- The County Board "may reverse the revocation decision if the county board of education determines that the findings made by the chartering authority under subdivision (h) are not supported by substantial evidence." (Ed. Code, § 47607, subd. (i)(2).)
- The County Board may affirm the revocation if it finds that the findings of the District Board are supported by substantial evidence. (Ed. Code, § 47607, subd. (i)(2).)
- If the County Board does not issue a decision on the appeal within 90 days of receipt, the Charter School may appeal the revocation to the State Board of Education (SBE). (Ed. Code, § 47607, subd. (i)(3).) If the County Board does not issue a decision within 90 days, the District's decision is upheld, pending any further appeal. (Cal. Code Regs., tit. 5, § 11968.5.4, subd. (b).)

If the County Board upholds the revocation or does not issue a decision on the appeal, the Charter School may appeal to the SBE. If the County Board reverses the revocation, the District may appeal to the SBE. (Ed. Code, § 47607, subds. (i)(2), (3).)

If the County Board (without further appeal) or SBE reverse the revocation, the Charter School would return to authorization by the District. (Ed. Code, § 47607, subd. (k).)

The Sacramento County Office of Education (SCOE) Analysis of the HCCS charter revocation appeal is attached.

Following the public hearing and review and consideration of the HCCS appeal and SCOE Analysis, the Board may take action on HCCS's charter revocation appeal. Proposed Resolutions are attached for the Board's consideration.

FINAL_SCOE Analysis HCCS CICA Charter Revocation Appeals_05-06-26.pdf

Proposed Res. No. 26-17A Affirming the TRUSD Board of Trustees' Decision to Revoke the HCCS.pdf

Proposed Res. No. 26-17B Reversing the TRUSD Board of Trustees' Decision to Revoke the HCCS.pdf

RECOMMENDED ACTION: The Superintendent recommends that the County Board conduct a public hearing and review and consider the Highlands Community Charter School revocation appeal and SCOE's Analysis and consider taking action on the revocation appeal.

10. New Business - Adoption of Consent Agenda

RECOMMENDED ACTION: Motion to Adopt Consent Agenda.

A. **Superintendent's Report on Personnel Transactions**

Superintendent's Report on Personnel Transactions 5.19.26.pdf

B. **Award Diplomas to Court and Community School Students - Jacqueline White/Michael Kast**

BACKGROUND:

The following 24 students are scheduled to graduate from each of their respective schools and they have completed all requirements for high school graduation:

Nathaniel S. Colley, Sr. - Senior Extension

- 3 Candidates

El Centro Jr./Sr. High School

- 1 Candidate

Elinor Lincoln Hickey Community School

- 1 Candidate

Elinor Lincoln Hickey Senior Extension

- 6 Candidates

North Area Community School

- 2 Candidates

North Area Senior Extension

- 11 Candidates

SUPERINTENDENT'S RECOMMENDATION: The Superintendent recommends that the Board approve the issuance of a high school diploma to these 24 students who have completed all requirements for graduation.

11. New Business - Approval of Contracts - Nicolas Schweizer

A. **No Contracts**

12. New Business - Authorization to Submit Grant Applications/Service Contracts and Accept Funding if Awarded; and Approval of Contracts, Positions, and Other Expenditures Associated with the Grants as Outlined in the Proposed Budget - David W. Gordon

RECOMMENDED ACTION: Motion to approve.

A. **K12 Strong Workforce Program-High Quality Advisory for Student Advancement Grant - Jacqueline White**

Department/Cabinet Member: College & Career Readiness/Jacqueline White

Funding Source: California Community College Chancellor's Office

Amount Requested: $350,000

Fiscal Year(s): 2027-2028

Program Description: SCOE will plan, organize, and facilitate robust Regional Career Technical Education (CTE) Advisory Meetings, focusing on high-wage, high-demand career opportunities and employer engagement, to enhance the quality and content of CTE programs. Objectives include Strengthening the Regional Advisory Structure, Expanding Employer and District Engagement during Regional Advisory Meetings, and Delivering Targeted Professional Development for all CTE staff, including administrators, counselors, teacher, etc.

New Position: None

Subcontracts: SCOE will enter into subcontracts, as necessary, to ensure the successful implementation of the grant. The subcontracts will support the completion of tasks outlined in the grant's scope of work and will help fulfill all deliverables in alignment with the expectations and requirements set forth by the grantor.

Evaluation Component: Quarterly expenditure reports and a final expenditure report with narrative will be submitted in the NOVA system by November 30, 2028.

Detailed Budget Attached

K12 Strong Workforce Program-High Quality Advisory for Student Advancement Grant Budget Page.pdf

RECOMMENDED ACTION: Motion to approve.

13. New Business - Other

A. **Authorization of Continued Emergency Contracting Pursuant to Public Contract Code Sections 22035 and 22050, and Adoption of Resolution No. 26-12 to Continue Authorization for Emergency Contracting of SCOE-Owned Portable at Dudley Elementary School - Nicolas Schweizer**

BACKGROUND:

At its April 10, 2026, meeting, the Board adopted Resolution No. 26-04 to authorize emergency contracting and relocate and install a portable at Dudley Elementary School. Public Contract Code Section 22050 requires the Board to review this emergency action at each subsequent meeting until the project is complete.

SCOE operates an essential student program at Dry Creek Elementary within the Twin Rivers Unified School District, and the district is now exercising its right to reclaim this classroom space for the upcoming term, leaving this SCOE Foundations program site without a facility. To ensure the continuity of educational services, SCOE has reached an agreement with Center Joint Unified School District to house the program at Dudley Elementary School by utilizing a SCOE-owned portable currently in storage. However, the Division of the State Architect is requiring mandatory site-performance upgrades for this new location.

The loss of the current site and the immediate need to house SCOE Foundation students creates a situation where any delay, due to following the standard bidding process to contract for the required upgrades, would result in a loss of essential public services. This action is necessary to ensure the classroom is legally

occupiable and safe before the start of the next session.

UPDATE: Since the Board adopted Resolution No. 26-04, staff continue to with HED (architectural firm) on project design in preparation for Division of State Architecture (DSA) review and project quoting.

Resolution 26-12 Continued Authorization_Dudley Elementary Portable.pdf

RECOMMENDED ACTION: The Superintendent recommends that the Board consider and adopt Resolution No. 26-12 to continue the authorization for emergency contracting so that we can ensure uninterrupted services for our SCOE Foundation students.

B. **Authorization of Emergency Contracting Pursuant to Public Contract Code Sections 22035 and 22050, and Adoption of Resolution No. 26-15 for Fire Remediation and Reconstruction of the CTE Construction Classroom at Elinor Lincoln Hickey Jr./Sr. High School – Nicolas Schweizer**

BACKGROUND:

On April 30, 2026, a fire occurred within SCOE's Career Technical Education (CTE) Construction Classroom at Elinor Lincoln Hickey Jr./Sr. High School ("Hickey"). Preliminary visual inspections and photographic evidence confirm significant damage to the interior facility, including:

- **Walls and Cabinetry:** Charring and smoke damage to storage and structural surfaces.
- **Ceiling and Flooring:** Damage to the overhead systems and floor coverings, requiring potential abatement and replacement.
- **Systems Integrity:** Possible compromise of electrical and HVAC systems within the classroom envelope.
- **Equipment:** Damage to CTE equipment, network switches, and computers.

The loss of this specialized instructional space prevents SCOE from delivering the CTE Construction curriculum and poses an immediate safety risk to the campus if left unaddressed. While a full structural and environmental assessment is pending, the visible damage constitutes an emergency that requires immediate intervention.

To ensure the continuity of educational services and to protect the facility from further environmental degradation (such as mold or structural weakening), SCOE must bypass the formal competitive bidding process. This action is necessary to immediately secure contractors for:

- **Hazardous Material Testing and Remediation:** Ensuring the site is safe from soot, ash, and smoke toxins.
- **Structural and Interior Reconstruction:** Replacing damaged walls, cabinetry, and finishes to return the classroom to an occupiable state.

Pursuant to Public Contract Code Sections 22035 and 22050, any delay resulting from the standard bidding process would impair SCOE's ability to provide essential public services and would extend the period during which students are displaced from their vocational training program.

FISCAL IMPACT: To be determined based on final assessment and insurance coverage. Initial emergency costs will be funded through General Fund - Deferred

Maintenance with reimbursement sought through SCOE's insurance provider.

Emergency Contracting Resolution Hickey CTE No. 26-15.pdf

RECOMMENDED ACTION: The Superintendent recommends that the Board adopt Resolution No. 26-15, declaring an emergency and authorizing staff to enter into the necessary contracts for the remediation and reconstruction of the Hickey CTE Construction Classroom.

C. **Adoption of Resolutions No. 26-13 and No. 26-14 Pay Absent Board Member - David W. Gordon**

Per Sacramento County Board of Education Bylaw 9260 (attached), Board members may be paid for any meeting when absent if the Board, by resolution duly adopted and included in its minutes, finds that at the time of the meeting, he or she was performing services outside the meeting on behalf of the board, he or she was ill, on jury duty, or the absence was due to hardship deemed acceptable by the Board.

The attached resolutions state that Trustees Alfred Brown and Vanessa Caigoy were absent on April 21, 2026 due to performing services outside the meeting on behalf of the Board, and that the Board finds this to be an acceptable hardship.

Resolutions + BB 9260.pdf

RECOMMENDED ACTION: Motion to approve.

D. **First Reading of Revisions to Board Policy 5113 - Pupil Attendance and Truancy - Policy Committee - Teresa Stinson**
BACKGROUND:

Attached is Board Policy 5113 - Pupil Attendance and Truancy. All proposed revisions are indicated by strikeouts and bold underlined additions.

The Policy Committee reviewed Board Policy 5113 - Pupil Attendance and Truancy on April 28, 2026, and recommended that the policy be presented to the Board for First Reading.

5113 BP Pupil Attendance and Truancy

This item is provided for information, and no action is required by the Board.

SUPERINTENDENT'S RECOMMENDATION: The Superintendent concurs with the recommendation of the Policy Committee that Board Policy 5113 - Pupil Attendance and Truancy be submitted to the Board of Education for First Reading.

E. **First Reading of Revisions to Board Policy 6146.1 - Graduation Requirements - Policy Committee - Teresa Stinson**
BACKGROUND:

Attached is Board Policy 6146.1 - Graduation Requirements. All proposed revisions are indicated by strikeouts and bold underlined additions. Policy Committee edits are indicated in blue font.

The Policy Committee reviewed Board Policy 6146.1 - Graduation Requirements on

April 28, 2026, and recommended that the policy be presented to the Board for First Reading as amended.

6146.1 BP Graduation Requirements

This item is provided for information, and no action is required by the Board.

SUPERINTENDENT'S RECOMMENDATION: The Superintendent concurs with the recommendation of the Policy Committee that Board Policy 6146.1 - Graduation Requirements be submitted to the Board of Education for First Reading.

F. **First Reading of Proposed New Board Bylaw 9006 - Board Calendar - Policy Committee - Teresa Stinson**
BACKGROUND:

Attached is proposed new Board Bylaw 9006 - Board Calendar. Policy Committee edits are indicated in blue font.

The Policy Committee reviewed Board Bylaw 9006 - Board Calendar on April 28, 2026, and recommended that the policy be presented to the Board for First Reading as amended.

9006 BB Board Calendar

This item is provided for information, and no action is required by the Board.

SUPERINTENDENT'S RECOMMENDATION: The Superintendent concurs with the recommendation of the Policy Committee that Board Bylaw 9006 - Board Calendar be submitted to the Board of Education for First Reading.

G. **First Reading of New Board Policy 5131.8 - Mobile Communication Devices - Policy Committee - Teresa Stinson**
BACKGROUND:

Attached is new Board Policy 5131.8 - Mobile Communication Devices. Policy Committee edits are indicated in blue font.

The Policy Committee reviewed Board Policy 5131.8 - Mobile Communication Devices on April 28, 2026, and recommended that the policy be presented to the Board for First Reading as amended.

5131.8 BP Mobile Communication Devices

This item is provided for information, and no action is required by the Board.

SUPERINTENDENT'S RECOMMENDATION: The Superintendent concurs with the recommendation of the Policy Committee that Board Policy 5131.8 - Mobile Communication Devices be submitted to the Board of Education for First Reading.

14. Board Reports, Comments, and Ideas

A. **Board Member Suggestions on Future Agenda Items ("Idea Log")**

B. **Board Members**

C. **Board President**

D. **Committees**

15. Items for Distribution

A. **May Events and Site Visits**

16. Schedule of Future Board Meetings

A. **June 9, 2026 Regular Board Meeting at 6:30 p.m.**

B. **June 23, 2026 Closed Session at 4:00 p.m.**

C. **June 23, 2026 Regular Board Meeting at 6:30 p.m.**

17. Adjournment

RECOMMENDED ACTION: Motion to Adjourn the meeting.

Exhibit M

Sacramento County Office of Education

Tuesday, May 19, 2026
BOARD OF EDUCATION MEETING

Minutes – Unapproved

1. Call to Order and Roll Call

President Corona Sabeniano called the regular meeting to order at 6:37 p.m. Other Board members present were Alfred Brown *(via Zoom)*, Harold Fong, Paul Keefer, Vanessa Caigoy, Bina Lefkovitz, and Heather Davis. Youth County Board Member Nairobi Dunbar was present.

Also present were David W. Gordon, Superintendent and Secretary to the Board, Dr. Nancy Herota, Deputy Superintendent; General Counsel Teresa Stinson; Associate Superintendents Nicolas Schweizer and Brent Malicote, Assistant Superintendents Jacqueline "Jackie" White, Navdeep Purewal, and Michael Kast; Executive Director Jerry Jones; and Executive Assistant Wende Watson.

2. Pledge of Allegiance

The Pledge of Allegiance was recited in the Board Study Session prior to this meeting.

3. Land Acknowledgement

A Land Acknowledgement was read in the Board Study Session prior to this meeting.

4. Visitor Presentations

A. **Public Comment**

There were public comments made by the following individuals: John Taylor regarding the Black Student Landscape Analysis; Jim Melrose regarding Board oversight; and Rebecca Mayo regarding negotiations.

There were also comments on Zoom from the following individuals regarding the removal of a School Based Mental Health and Wellness Clinician: Leona K., Kasia H., Sandra V., Kao Ye T., Michaela L., and Elijah Y.

There was a public comment from Katie K. on Zoom regarding SCOE Board's responsibility to taxpayers.

B. **Employee Organizations**

Wendi Beatty, CSEA President provided a Union report.

5. Approval of Minutes

A. No Minutes

6. Adoption of Agenda

Adoption of the Agenda

Moved by: Keefer; seconded by: Caigoy

Yes: Brown, Lefkovitz, Fong, Davis, Corona Sabeniano, Keefer, Caigoy

Preferential Vote: Yes: Dunbar

Motion Carried

7. Official Correspondence

There was no official correspondence.

8. Superintendent's Report

A. **Superintendent's Report**

Thanked Trustee Caigoy for coming to our celebratory event in support of our more than 2,400 multilingual students who received their State Seal of Biliteracy certificates on May 7, 2026.

Also on May 7, as well as on May 8, 2026, we honored 11 graduates from schools in our Foundations Academy led by Michael Kast and his special education team. Thanked Trustees Caigoy, Keefer, and Lefkovitz for attending.

On May 12 and 13, 2026, SCOE hosted a Wellness Summit in partnership with California State University, Sacramento entitled, “Dreaming Forward: Building SEL Systems for Collective Thriving and Transformation.” The summit brought educators, students, partners, and leaders together to strengthen social-emotional learning systems and focus on how we build conditions where students and adults can thrive.

On May 12, 2026, the California State Board of Education voted for the inclusion of the State Seal of Civic Engagement as a measure within the California School Dashboard’s College and Career Indicator. This move is a significant step toward elevating civic learning alongside academic and career readiness and making civic learning more visible and accessible to all students.

Congratulated Lisa Saenz on her nomination for the Juvenile Court, Community, and Alternative Schools Administrators of California (JCCASAC) Teacher of the Year program. She was honored May 14, 2026, during the 56th Annual JCCASAC Conference in San Francisco as one of California's top educators in alternative education.

Leila Vera, Project Specialist II with Cal-SOAP, has been selected as *Sacramento State College of Education’s 2026 County Office of Education Partner of the Year*. Leila was nominated for her outstanding mentorship of school counseling trainees and interns, her strong supervision during field placements, and the many ways she helps prepare future school counselors to serve students. She will be formally recognized at Sacramento State’s *Stronger Together* celebration on September 25.

On Friday, May 22, we will celebrate our Senior Extension graduates at the Scottish Rite Masonic Center. We will also celebrate Leo A. Palmiter Jr./Sr. High School students at their 8th Grade Promotion on May 26, at Palmiter and High School Graduation on May 27, also at Palmiter.

Draft

B. **Sacramento County Office of Education's 2026 Classified School Employee of the Year - Xanthi Soriano**

Teagan Hackbarth, Transition Specialist at El Centro Jr./Sr. High School, was recognized and honored as the Sacramento County Office of Education's 2026 Classified School Employee of the Year.

9. New Business - Charter Schools

A. **NOTICE OF PUBLIC HEARING, Discussion, and Action on California Innovative Career Academy Charter Revocation Appeal - Teresa Stinson**

A public hearing was held to review and consider the California Innovative Career Academy's (CICA) appeal of its charter revocation.

B. **NOTICE OF PUBLIC HEARING, Discussion, and Action on Highlands Community Charter School Revocation Appeal - Teresa Stinson**

A public hearing was held to review and consider the Highlands Community Charter School's (HCCS) appeal of its charter revocation.

Public Hearing opened at 7:09 p.m.

SCOE General Counsel Teresa Stinson provided a summary of SCOE's Analysis of the charter revocation appeals.

The following representatives presented on behalf of California Innovative Career Academy and Highlands Community Charter School: Jonathan Raymond, Executive Director; Jerry Simmons and Darryl Steinberg, Legal Counsel.

The following representatives presented on behalf of Twin Rivers Unified School District: Ryan Degiulio, Chief Business Official, and their attorney, William Schuetz of Dannis Woliver Kelley.

The following individuals made public comments regarding this agenda item: Hossam Buzgheia, Melissa Roberson, Shaina Miranda, Julieanne Neal, Oscar Aguilar, Alejandro, Romero, Zarmina Noori Wordak, Svitlana Iotko, Nate Garcia, Sadaf Hobib, Jonathan Richardson, Bill Knowlten, Kathy Chao Rothberg, Arezo Akbari, Ceyeb Freidenfelt, Omar Karamkhil, Shariulla Hotak, Eid Mohammad Noori, Ahmad Ibrahimi, Paryma Azizi, Michael Strelo-Smith, Nikkie Ramon-Tewksbury, Sahar Ahmadi, Adiba Hadid, Anna Mozghova, Maria Sandoval, Iurii Efimov, Karla Rios, Anibal Meza, Adam Graham, Laura Kerr, Sean Frame, Ann Aguilar, Esteban Numz, Isabella Suleiman, Kaila Rios, Kent Mendoza, Tyrique Shipp, Sonya Bonnett, Mari Candela, Fabian Gutierrez, Jazmine Adrincula, Luis Gonzalez, Zena Williams, Said Najahizada, and Valerie Bryan.

Public Hearing Closed at 9:33 p.m.

Given that it was nearing 10:00 p.m. and there was still business to conduct, pursuant to Board Bylaw 9323, Trustee Caigoy moved to waive the four-hour Board meeting limit and extend the meeting until the completion of all agendized business; seconded by Fong.

Yes: Brown, Lefkovitz, Fong, Davis, Corona Sabeniano, Keefer, Caigoy
Preferential Vote: Yes: Dunbar
Motion Carried

The Board asked questions, discussed, and deliberated on the CICA and HCCS charter revocation appeals.

Trustee Fong moved to adopt Resolution No. 26-16A Affirming the Twin Rivers Unified School District Board of Trustees' Decision to Revoke the California Innovative Career Academy; seconded by Keefer.

Yes: Corona Sabeniano, Fong, Keefer
No: Caigoy, Brown, Davis, Lefkovitz
Preferential Vote: Abstain: Dunbar
Motion Failed

Trustee Davis moved to adopt Resolution No. 26-16B Reversing the Twin Rivers Unified School District Board of Trustees' Decision to Revoke the California Innovative Career Academy; seconded by Brown.

Yes: Caigoy, Brown, Davis, Lefkovitz
No: Corona Sabeniano, Fong, Keefer
Preferential Vote: Abstain: Dunbar
Motion Carried

Trustee Davis moved to adopt Resolution No. 26-17B Reversing the Twin Rivers Unified School District Board of Trustees' Decision to Revoke the Highlands Community Charter School; seconded by Brown.

Yes: Caigoy, Brown, Davis, Lefkovitz
No: Corona Sabeniano, Fong, Keefer
Preferential Vote: Abstain: Dunbar
Motion Carried

10. New Business - Adoption of Consent Agenda

RECOMMENDED ACTION: Motion to Adopt Consent Agenda.

Moved by: Caigoy; seconded by: Keefer

Yes: Brown, Lefkovitz, Fong, Davis, Corona Sabeniano, Keefer, Caigoy

Preferential Vote: Yes: Dunbar

Motion Carried

A. **Superintendent's Report on Personnel Transactions**

B. **Award Diplomas to Court and Community School Students - Jacqueline White/Michael Kast**

Assistant Superintendent Kast announced 24 graduates including three candidates from Nathaniel S. Colley, Sr. - Senior Extension, one candidate from El Centro Jr./Sr. High School, one candidate from Elinor Lincoln Hickey Community School, six candidates from Elinor Lincoln Hickey Senior Extension, two candidates from North Area Community School, and 11 candidates from North Area Senior Extension.

11. New Business - Approval of Contracts - Nicolas Schweizer

A. **No Contracts**

12. New Business - Authorization to Submit Grant Applications/Service Contracts and Accept Funding if Awarded; and Approval of Contracts, Positions, and Other Expenditures Associated with the Grants as Outlined in the Proposed Budget - David W. Gordon

RECOMMENDED ACTION: Motion to approve.

Moved by: Davis; seconded by: Caigoy

Yes: Brown, Lefkovitz, Fong, Davis, Corona Sabeniano, Keefer, Caigoy

Preferential Vote: Yes: Dunbar

Motion Carried

A. **K12 Strong Workforce Program - High-Quality Advisory for Student Advancement Grant - Jacqueline White**

13. New Business - Other

A. **Authorization of Continued Emergency Contracting Pursuant to Public Contract Code Sections 22035 and 22050, and Adoption of Resolution No. 26-12 to Continue Authorization for Emergency Contracting of SCOE-Owned Portable at Dudley Elementary School - Nicolas Schweizer**

Trustee Keefer made a motion to adopt Resolution No. 26-12 to continue the authorization for emergency contracting so that we can ensure uninterrupted services for our SCOE Foundation students; seconded by Caigoy.

Yes: Brown, Lefkovitz, Fong, Davis, Corona Sabeniano, Keefer, Caigoy

Preferential Vote: Yes: Dunbar

Motion Carried

B. **Authorization of Emergency Contracting Pursuant to Public Contract Code Sections 22035 and 22050, and Adoption of Resolution No. 26-15 for Fire Remediation and Reconstruction of the CTE Construction Classroom at Elinor Lincoln Hickey Jr./Sr. High School – Nicolas Schweizer**

Trustee Keefer made a motion to adopt Resolution No. 26-15, declaring an emergency and authorizing staff to enter into the necessary contracts for the remediation and reconstruction of the Hickey CTE Construction Classroom; Seconded by Caigoy.

Yes: Brown, Lefkovitz, Fong, Davis, Corona Sabeniano, Keefer, Caigoy
Preferential Vote: Yes: Dunbar
Motion Carried

C. **Adoption of Resolutions No. 26-13 and No. 26-14 Pay Absent Board Member - David W. Gordon**

RECOMMENDED ACTION: Motion to approve.
Moved by: Lefkovitz; seconded by: Keefer
Yes: Lefkovitz, Fong, Davis, Corona Sabeniano, Keefer
Abstain: Brown, Caigoy
Preferential Vote: Abstain: Dunbar
Motion Carried

D. **First Reading of Revisions to Board Policy 5113 - Pupil Attendance and Truancy - Policy Committee - Teresa Stinson**

This item is provided for information, and no action is required by the Board.

E. **First Reading of Revisions to Board Policy 6146.1 - Graduation Requirements - Policy Committee - Teresa Stinson**

This item is provided for information, and no action is required by the Board.

F. **First Reading of Proposed New Board Bylaw 9006 - Board Calendar - Policy Committee - Teresa Stinson**

This item is provided for information, and no action is required by the Board.

G. **First Reading of New Board Policy 5131.8 - Mobile Communication Devices - Policy Committee - Teresa Stinson**

This item is provided for information, and no action is required by the Board.

14. Board Reports, Comments, and Ideas

A. **Board Member Suggestions on Future Agenda Items ("Idea Log")**

Trustee Keefer requested a plan for engaging students in policy changes.

Trustee Caigoy requested that a retreat date be scheduled.

Trustee Lefkovitz requested that a SCOE representative connect with Black Parents United and requested a communication explaining the Board's role with charters.

B. **Board Members**

Youth County Board Member Dunbar thanked SCOE Staff Charlie Gilmore and Veronica Ruiz for their support and collaboration with the Student Advisory Counsel.

Trustee Caigoy thanked Associate Superintendent Nick Schweizer for the Board Study Session budget presentation.

Trustee Keefer suggested that community members preview the Black Student Success Collective report scheduled for the June 9, 2026 Board meeting.

Draft

Trustees Brown, Fong, Davis, and Lefkovitz had no reports.

C. **Board President**
No report.

D. **Committees**

15. Items for Distribution

A. **May Events and Site Visits**

16. Schedule of Future Board Meetings

A. **June 9, 2026 Regular Board Meeting at 6:30 p.m.**

B. **June 23, 2026 Closed Session at 4:00 p.m.**

C. **June 23, 2026 Regular Board Meeting at 6:30 p.m.**

17. Adjournment

RECOMMENDED ACTION: Motion to Adjourn the meeting.
Moved by: Keefer; seconded by: Fong
Yes: Brown, Lefkovitz, Fong, Davis, Corona Sabeniano, Keefer, Caigoy
Preferential Vote: Yes: Dunbar
Motion Carried
The meeting was adjourned at 11:29 p.m.

Respectfully submitted,

Jacqueline White
Secretary to the Board

Date approved:

Draft

Exhibit N

October 2026 ACCS Meeting Agenda

Advisory Commission on Charter Schools (ACCS) October 6, 2026, meeting notice of agenda items and attachments.

Advisory Commission on Charter Schools Meeting Notice

An Advisory Body to the California State Board of Education

Tuesday, October 6, 2026
9:30 a.m. to 1:30 p.m.±*

California Department of Education
1430 N Street, Room 1101
Sacramento, CA 95814-5901

Commissioners

- Helio Brasil (participating remotely)**
- Andrew Crowe (participating remotely)**
- Todd Finnell (participating remotely)**
- Erika Jones (participating remotely)
- Derek King (participating remotely)**
- Ric Reyes[1]
- Matt Taylor (participating remotely)
- Mike Walsh (participating remotely)**

California State Board of Education Liaisons

- Cynthia Glover Woods
- Sharon Olken

**Updated on October 5, 2026, to add an indication that these ACCS commissioners will participate remotely.

Agenda

- Call to Order
- Salute to Flag
- Welcome and Introductions
- Review and Adoption of Previous Meeting Notes/Minutes (Action)
  - Preliminary Meeting Notes for June 2, 2026
- Charter Schools Division Update
- Review/Reordering of Meeting Agenda
- Public Comment[2]

Agenda Item

Item 01

Item 01 (DOCX)

Type of Action: Action, Information

Subject: Consideration of a Determination of Funding Request as Required for Nonclassroom-Based Charter Schools Pursuant to California *Education Code* Sections 47612.5 and 47634.2, and Associated *California Code of Regulations*, Title 5.

- Item 01 Attachment 1: Proposed Recommendation for a Nonclassroom-Based Determination of Funding Request (XLSX)
- Item 01 Attachment 2: Determination of Funding Request from Phoenix Charter Academy College View (Charter #2126) (DOCX)

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Item 02

Item 02 (DOCX; **REVISED** 30-Sep-2026)***

Type of Action: Action, Information

Subject: Appeal of a County Board of Education's Reversal of a Charter Revocation: Consider Whether the Twin Rivers Unified School District's Revocation of the Charter of Highlands Community Charter School Is Supported by Substantial Evidence, Pursuant to California *Education Code* Section 47607(i)(4).

- Item 02 Attachment 1: California Department of Education Charter School Appeal Review (DOCX; **REVISED** 30-Sep-2026)***
- Item 02 Attachment 2: Notice of Appeal from Twin Rivers Unified School District (PDF)
- Item 02 Attachment 3: Administrative Record, as submitted by Twin Rivers Unified School District (PDF; 588MB)

Filed 10/27/26 Case 26-02134 Doc 20

- Item 02 Attachment 4: Charter School Written Opposition to District Appeal, submitted by Highlands Community Charter School (PDF)
- Item 02 Attachment 5: District Reply to Charter School Written Opposition, submitted by Twin Rivers Unified School District (PDF)

***Revised on September 30, 2026, to restore the text of the footnotes in Attachment 1, which was inadvertently omitted when the document was prepared for web posting, and to correct citations in the Item and Attachment 1.

Public Comment

- October 2026 Meeting - Items 2 and 3 Public Comment 1

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Item 03

Item 03 (DOCX; **REVISED** 30-Sep-2026)****

Type of Action: Action, Information

Subject: Appeal of a County Board of Education's Reversal of a Charter Revocation: Consider Whether the Twin Rivers Unified School District's Revocation of the Charter of California Innovative Career Academy Is Supported by Substantial Evidence, Pursuant to California *Education Code* Section 47607(i)(4).

- Item 03 Attachment 1: California Department of Education Charter School Appeal Review (DOCX; **REVISED** 30-Sep-2026)****
- Item 03 Attachment 2: Notice of Appeal from Twin Rivers Unified School District (PDF)
- Item 03 Attachment 3: Administrative Record, as submitted by Twin Rivers Unified School District (PDF; 681MB)
- Item 03 Attachment 4: Charter School Written Opposition to District Appeal, submitted by California Innovative Career Academy (PDF)
- Item 03 Attachment 5: District Reply to Charter School Written Opposition, submitted by Twin Rivers Unified School District (PDF)

****Revised on September 30, 2026, to insert the word “not” into a sentence on page 15 of Attachment 1 to accurately reflect the California Department of Education’s analysis that the lease for the San Diego facility was not terminated until November 15, 2025, and to correct citations in the Item and Attachment 1.

Public Comment

- October 2026 Meeting - Items 2 and 3 Public Comment 1

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Exhibit O

M. 8. ADOPT Resolution No. 1649 Approving the Appeal of the Sacramento County Board of Education's Decision Regarding the Revocation of Highlands Community Charter School and California Innovative Career Academy to the State Board of Education

Quick Summary / Abstract

The District is the chartering authority of Highlands Community Charter School (HCCS) and California Innovative Career Academy (CICA). HCCS and CICA are operated and governed independently by Highlands Community Charter and Technical Schools (HCCTS) and its Board of Directors.

Based upon the substantial evidence demonstrating that HCCS and CICA failed to refute and/or remedy multiple violations identified in the prior issued Notice of Violation, District Staff recommended that the Board approve issuance of the Notice of Intent to Revoke and notice of facts in support of revocation (Notice of Intent to Revoke) to HCCS and CICA pursuant to Education Code section 47607 and California Code of Regulations, title 5, section 11968.5.2. The Board approved issuance of the Notices of Intent to Revoke at its meeting on November 4, 2025.

On January 30, 2026, the District Board convened at a special meeting and adopted the findings of fact contained in the Notice of Intent to Revoke and its exhibits, as initially set forth in the Notice of Violation, as its written factual findings, supported by substantial evidence specific to HCCS and CICA, and unanimously approved the issuance of a Final Decision to Revoke the HCCS and CICA Charters, effective immediately.

On February 27, 2026, HCCTS timely submitted a Notice of Appeal of the HCCS and CICA revocation decisions to the Sacramento County Board of Education (County Board) pursuant to Education Code section 47607 and California Code of Regulations, title 5, section 11968.5.4, and on May 19, 2026, the County Board, by a vote of 4-3, reversed the District Board's Decision to revoke the HCCS and CICA Charters. Pursuant to California Code of Regulations, title 5, section 11968.5.5, the District Board may elect to appeal the County Board's decision to the State Board of Education within 30 calendar days of receiving the County Board's decision.

By adopting Resolution No. 1649, the Board will approve and authorize the District Superintendent or designee to submit the District's appeal of the Sacramento County Board of Education's decision regarding the revocation of HCCS and CICA to the State Board of Education.

The Superintendent recommends that the Board adopt Resolution No. 1649 Approving the Appeal of the Sacramento County Board of Education's Decision Regarding the Revocation of Highlands Community Charter School and California Innovative Career Academy to the State Board of Education. Contact person: Ryan DiGiulio, Chief Business Official, ryan.digiulio@trusd.net, (916)566-1600 ext. 31203.

Rationale

The District is the chartering authority of Highlands Community Charter School (HCCS) and California Innovative Career Academy (CICA). HCCS and CICA are operated and governed independently by Highlands Community Charter and Technical Schools (HCCTS) and its Board of Directors.

Based upon the substantial evidence demonstrating that HCCS and CICA failed to refute and/or remedy multiple violations identified in the prior issued Notice of Violation, District Staff recommended that the Board approve issuance of the Notice of Intent to Revoke and notice of facts in support of revocation (Notice of Intent to Revoke) to HCCS and CICA pursuant to Education Code section 47607 and California Code of Regulations, title 5, section 11968.5.2. The Board approved issuance of the Notices of Intent to Revoke at its meeting on November 4, 2025.

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By adopting Resolution No. 1649, the Board will approve and authorize the District Superintendent or designee to submit the District's appeal of the Sacramento County Board of Education's decision regarding the revocation of HCCS and CICA to the State Board of Education.

The Superintendent recommends that the Board adopt Resolution No. 1649 Approving the Appeal of the Sacramento County Board of Education's Decision Regarding the Revocation of Highlands Community Charter School and California Innovative Career Academy to the State Board of Education. Contact person: Ryan DiGiulio, Chief Business Official, ryan.digiulio@trusd.net, (916)566-1600 ext. 31203.

Supporting Documents

Resolution No. 1649

Created on 6/9/2026 at 7:12 AM PT by Sharilyn Warta
Last Modified on 6/9/2026 at 3:18 PM PT by Yasmina Flores

Exhibit P

TwinRivers
UNIFIED SCHOOL DISTRICT

Board of Trustees

Christine Jefferson
President

Sascha Vogt
Vice President

Michael Baker
Clerk

Emmanuel Amanfor
Member

Stacey E. Bastian
Member

Basim Elkarra
Member

Sharon Reichelt
Member

Superintendent

Tu Moua Carroz, Ed. D.

To inspire each student to extraordinary achievement every day!

August 6, 2026

VIA OVERNIGHT DELIVERY AND EMAIL

Jonathan Raymond, Executive Director
Highlands Community Charter and Technical Schools
1333 Grand Ave.
Sacramento, CA 95838
jonathan.raymond@hccts.org

Highlands Community Charter and Technical Schools Board of Directors:
Matt Levesque – matt.levesque@hccts.org
Symia Stigler – symia.stigler@hccts.org
Crystal Sheffield – crystal.sheffield@hccts.org
Suleiman Shetab – suleiman.shetab@hccts.org

RE: Notice of Violation Pursuant to Education Code Section 47607
Highlands Community Charter School

Dear HCCTS Board of Directors and Mr. Raymond:

With this letter, the Twin Rivers Unified School District ("District") Board of Trustees ("Board"), as the chartering authority of Highlands Community Charter School ("HCCS" or "Charter School"), is providing this Notice of Violation and a reasonable opportunity to remedy the violations stated herein, pursuant to Education Code section 47607 and Title 5, applicable California Code of Regulations.

In accordance with Title 5, section 11968.5.2(a) and (b), of the California Code of Regulations ("Section 11968.5.2"), the District provides this Notice of Violation to HCCS' governing body at least seventy-two (72) hours prior to the District's **August 11, 2026**, Board Meeting during which the Board will consider whether to issue this Notice of Violation in accordance with applicable law.

In conformity with Section 11968.5.2(a), HCCS is hereby provided with notice of the following proposed action by the Board:

> **PLEASE TAKE NOTICE** that at or about **6:00 p.m.** on **August 11, 2026,** the Twin Rivers Unified School District Board of Trustees will hold a meeting at the District Offices, 5115 Dudley Blvd., McClelland Park, California, and consider whether to issue this Notice of Violation under Education Code section 47607, based upon HCCS' material violation of the conditions, standards, or procedures of its Charter, and violation of law.

All relevant documents related to the proposed action to issue the Notice of Violation are attached as Exhibits. HCCS is in material violation of the conditions, standards, or procedures set forth in its Charter, and in violation of the law as further described below.

I. BACKGROUND

The Board initially approved the petition for the establishment of HCCS in 2014 for a term running through June 30, 2019. On or about March 5, 2019, the Board conditionally approved the petition to renew HCCS' Charter for a five-year term from July 1, 2019, through June 30, 2024 ("Charter"). Per Education Code section 47607.4, HCCS' Charter was automatically extended through June 30, 2027, by operation of law. *(A copy of HCCS' current Charter is attached as Exhibit A).* HCCS is operated and governed independently by Highlands Community Charter and Technical Schools ("HCCTS"), a California nonprofit public benefit corporation, and its Board of Directors.

As part of its oversight duties as chartering authority, the District is responsible for monitoring the fiscal condition of HCCS and whether it is operating in compliance with the conditions, standards, or procedures set forth in its Charter, meeting or pursuing the pupil outcomes identified in its Charter, engaging in fiscal mismanagement, and complying with the law. (Ed. Code, § 47607(f).) Specifically, Education Code section 47607(f) provides the following:

> A charter may be revoked by the chartering authority if the chartering authority finds, through a showing of substantial evidence, that HCCS did any of the following:
>
> (1) Committed a material violation of any of the conditions, standards, or procedures set forth in the charter.
> (2) Failed to meet or pursue any of the pupil outcomes identified in the charter.
> (3) Failed to meet generally accepted accounting principles or engaged in fiscal mismanagement.
> (4) Violated any law.

The District has determined that HCCS materially violated the conditions, standards, and procedures of its Charter, and violated the law as set forth below, warranting issuance of this Notice of Violation. Relevant documents are attached to this Notice of Violation as Exhibits.

This Notice of Violation ("Notice") sets forth:

(1) HCCS' alleged specific material violations of a condition, standard, or procedure set out in the HCCS Charter pursuant to Education Code section 47607(f)(l), and the specific provisions of law that HCCS allegedly failed to follow pursuant to Education Code section 47607(f)(4);

(2) All evidence relied upon by the chartering authority in determining HCCS engaged in any of the acts or omissions identified in the Notice of Violation, including the date and duration of the alleged violations, showing the violations are both material and uncured, and that the alleged violations occurred within a reasonable period of time before a notice of violation is issued; and

(3) The period of time that the chartering authority has concluded is a reasonable period of time for HCCS to remedy or refute the identified violations. In identifying the time period that will serve as HCCS' reasonable opportunity to remedy the identified violations, the District has considered the amount of time reasonably necessary to remedy each identified violation.

(Cal. Code Regs, tit. 5, § 11965(f)(1)-(3).)

Accordingly, the District hereby places HCCS on notice that should it fail to submit to the District a detailed, written response addressing the identified violation which shall include the refutation, remedial action taken, or proposed remedial action by HCCS specific to each alleged violation, on or before **October 9, 2026**, the Board may proceed with the process for revoking HCCS' Charter.

II. VIOLATIONS OF LAW

HCCS has committed the following violations of law:

A. HCCS Failed to File an Independent Financial Audit Report for Fiscal Year 2024-25

Education Code section 47064.33(a) requires that all charter schools file certain periodic financial reports, including annual financial audits. Receipt of these financial reports is needed for the District to perform the oversight duties identified in Education Code section 47604.32(a), including "monitoring the fiscal condition of the charter school." (Ed. Code, § 47064.32(a)(4).) Additionally, Education Code section 47605(m) requires a charter school to, "provide for an annual and independent financial and compliance audit in accordance with Section 41020." Per Education Code section 41020(k)(1):

> On or before January 31 of each year, a report of each local educational agency audit for the preceding fiscal year shall be filed with specified entities, as follows: [...]

> (B) For charter schools, with its chartering authority, the Superintendent, the Controller, and the county superintendent of schools of the county in which the charter school is located, unless the county board of education of the county in which the charter school is located is the chartering authority.[1]

Despite repeated communications, multiple extensions, and numerous opportunities to achieve compliance, HCCS has failed to file its 2024–25 annual independent financial audit report as required by law. As of the date of this Notice, the required audit remains outstanding.

Throughout its communications with the District regarding both the 2023–24 and 2024–25 audits, HCCTS has identified various circumstances that it contends contributed to delays in completing the required audit, including issues involving prior auditors, the State Controller's review processes, contracting delays, and the selection of a new independent audit firm. However, the obligation to ensure completion and timely submission of the annual independent financial audit rests with HCCTS as the entity responsible for operating HCCS in accordance with applicable law. Accordingly, HCCTS' statutory responsibility remains regardless of changes in leadership, staffing transitions, prior audit findings, contractual disputes, or operational challenges. While such circumstances may affect how HCCTS fulfills its legal obligations, they do not relieve the organization of its continuing duty to ensure compliance with mandatory statutory reporting requirements.

The annual independent audit serves a critical public accountability function by providing an independent evaluation of the Charter School's financial statements, internal controls, and compliance with applicable law. Unlike financial reports prepared by the HCCS itself, the annual audit provides independent assurance regarding the Charter School's financial condition and the administration of public funds. HCCS' failure to provide its annual audit report for the 2024-25 fiscal year, hinders the District's ability to properly carry out its duties as chartering authority to oversee the Charter School's operations and monitor its fiscal condition. Without a completed audit, the District is deprived of one of the principal oversight mechanisms established by law for independently evaluating the Charter School's fiscal condition and determining whether public funds are being administered in accordance with applicable legal requirements.

The District's inability to review the required audit is particularly significant in this matter. On March 13, 2026, the State Controller's Office notified HCCS that its desk review determined the

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[1] This content in Education Code sections 47605 and 41020 reflects changes effective July 1, 2026. The prior version of Education Code section 47605(m) in effect at the time HCCS was required to submit its audit report for the 2024-25 fiscal year by December 15, 2025 stated: "A charter school shall transmit a copy of its annual, independent financial audit report for the preceding fiscal year, as described in subparagraph (I) of paragraph (5) of subdivision (c), to its chartering authority, the Controller, the county superintendent of schools of the county in which the charter school is sited, . . . and the department by December 15 of each year." HCCS is out of compliance with both the prior and current version of Education Code section 47605(m) given that to date it has not filed an annual independent financial audit for the 2024-25 fiscal year.

2023–24 independent audit report failed to meet the minimum reporting standards established in the *Guide for Annual Audits of K–12 Local Education Agencies and State Compliance Reporting*. *(See Exhibit B.)* This determination by the State Controller significantly heightened the District's concern regarding HCCS' ability to produce a legally sufficient 2024–25 audit. It also reinforced the importance of obtaining a timely and compliant 2024–25 audit so the District can evaluate HCCS' fiscal condition and verify compliance with applicable law.

During the 2025-26 school year, while conducting annual oversight activities, the District identified ongoing fiscal concerns, including projected deficit spending, reserve depletion, debt obligations, multi-year financial projections, attendance reporting, instructional minute compliance, and other fiscal matters ordinarily addressed through the annual audit process. *(See Exhibit C, May 5, 2025 Second Interim Technical Review Summary.)* The continued absence of the required financial audit materially impairs the District's ability to assess these issues and fulfill the oversight responsibilities required by Education Code section 47604.32.

HCCS' failure to submit the 2024–25 annual independent financial audit report cannot be viewed in isolation. Rather, the circumstances surrounding both the 2023–24 and 2024–25 audit cycles demonstrate a continuing pattern of noncompliance with HCCTS' legal responsibilities. As of the date of this Notice, the 2023–24 audit has not yet been accepted by the State Controller's Office, and the 2024–25 audit likewise remains outstanding. The continuation of these deficiencies under new leadership is significant because it demonstrates that the underlying compliance issues have persisted despite repeated communications, multiple extensions, and substantial opportunities afforded to HCCTS by the District to achieve compliance.

As reflected in the enclosed 2024-25 Independent Audit Report Communication Log and the series of documents referenced therein *(see Exhibit C)*, the District actively worked with HCCTS over an extended period to facilitate compliance. The significance of the Communication Timeline demonstrates that despite repeated accommodations by the District, multiple extensions, and numerous assurances from HCCTS that compliance was forthcoming, HCCS has failed to satisfy one of its most fundamental statutory obligations.

III. VIOLATIONS OF CHARTER

HCCS violated the following conditions, standards, or procedures set forth in its Charter:

A. HCCS Failed to File an Independent Financial Audit Report for Fiscal Year 2024-25

The HCCS Charter on page 153 states:

> An annual independent fiscal audit of the books and records of HCCS is conducted as required by Education Code Sections 47605(b)(5)(I) and 47605(m).
>
> [...]
>
> **9.2: Completing the Audit**

> It is anticipated that the annual audit will be completed within six months of the close of the fiscal year. A copy of the auditor's findings will be forwarded to TRUSD, the County Superintendent of Schools, the State Controller, and to the CDE by the 15th of December of each year.
>
> (Emphasis added.) *(Exhibit A.)*

The HCCS Charter on page 182 states:

> 2. By December 15, an interim financial report for the current fiscal year reflecting changes through October 31. Additionally, on December 15, a copy of HCCS's annual, independent financial audit report for the preceding fiscal year shall be delivered to the State Controller, State Department of Education and County Superintendent of Schools.
>
> (Emphasis added.) *(Exhibit A.)*[2]

As outlined by the evidence provided above and attached as Exhibits, by failing to file an annual independent financial audit report for the 2024-25 fiscal year, HCCS has materially violated the conditions, standards, or procedures set forth in its Charter.

IV. CONCLUSION AND REMEDY PERIOD

Please be advised that the District views HCCS' material violations of the conditions, standards, or procedures of its Charter, and violations of law as grounds to issue this Notice of Violation and the District may pursue further steps towards revocation of HCCS' Charter if these violations are not remedied.

Section 11968.5.2(c) describes a charter school governing body's obligation once a Notice of Violation is received:

> Upon receipt of a Notice of Violation, the charter school's governing body, as described in the school's charter, if it chooses to respond, shall take the following actions:
>
> (1) Submit to the chartering authority a detailed, written response addressing each identified violation which shall include the refutation, remedial action taken, or proposed remedial action by the charter school specific to each alleged violation; the written response shall be due by the end of the remedy period identified in the Notice of Violation; and

[2] Although Education Code sections 47605 and 41020 have been revised effective July 1, 2026, to change the date by when a charter school's annual financial audit report must be filed, the fact remains that as of the date of this Notice, HCCS has not filed an annual independent financial audit for the 2024-25 fiscal year in violation of its Charter.

(2) Attach to its written response supporting evidence of the refutation, remedial action, or proposed remedial action, if any, including written reports, statements, and other appropriate documentation.

The District is providing HCCTS with a reasonable remedy period of up to and including **October 9, 2026**, to provide the written response described above.

The reasonable remedy period is based in part upon HCCTS' own representation regarding the time it needs to achieve compliance. In HCCTS' July 6, 2026 correspondence to the District, it acknowledged that the 2024–25 annual independent financial audit report remained outstanding and requested an extension of the submission deadline to September 30, 2026, explaining that its independent auditor had committed to finalizing the audit report during September 2026. *(See Exhibit C.)* In establishing a remedy period ending October 9, 2026, the District has afforded HCCTS time beyond the extension deadline it requested for submission of its required audit. This deadline is not intended to extend HCCTS' requested completion deadline; rather, it provides HCCTS with a reasonable administrative review period in the event the audit is completed by its auditor near the end of September, allowing sufficient time for HCCTS to receive and review the report.

The District therefore concludes that the remedy period is reasonable under the circumstances as it is based upon the timeline proposed by HCCTS itself while also providing HCCTS with sufficient time to receive and review the report if needed.

As a result, and since the District views HCCS' material violations of its Charter and violations of law as grounds for revocation, the District has determined that the point has been reached where it is necessary to initiate the first step in the formal revocation process with the issuance of a Notice of Violation per Education Code section 47607(g) and Title 5 of the California Code of Regulations, section 11968.5.2.

Sincerely,

Dr. Tu Moua Carroz
Superintendent

cc: David Gordon, Sacramento County Superintendent of Schools (dgordon@scoe.net)

Enclosures: Exhibits A - C

Pages 8-197 Excluded

MALIA M. COHEN
California State Controller

March 13, 2026

Eide Bailly LLP
10681 Foothill Blvd., Ste. 300
Rancho Cucamonga, CA 91730-3831

Re: Rejection Letter – Fiscal Year 2023-24 Highlands Community Charter Audit Report

The State Controller's Office (SCO) has completed our desk review of the referenced entity's annual audit report for the fiscal year ended June 30, 2024. The review found that the audit report did not meet the minimum reporting standards contained in the audit guide, *2023-24 Guide for Annual Audits of K-12 Local Education Agencies and State Compliance Reporting*, and prescribed in Title 5, *California Code of Regulations*, Section 19810.

The attachment to this letter describes the exception(s) noted during the review. The SCO recommends that you correct the exception(s) and modify your report within 30 days from receipt of this letter. Upon receipt, of the revised report, the SCO will review it and notify you and the auditee of the review results. The audit fee percentage stipulated in the audit contract must be withheld until the audit report is certified.

It is important to ensure that a copy of the revised audit report is provided to each recipient of the originally issued audit report. Therefore, your transmittal letter to the SCO must confirm that the revised reports are being forwarded to all recipients, particularly the California Department of Education.

Submit one copy of the revised audit report to the SCO by uploading it to the SCO Data Exchange Portal (DEP) at https://dep.sco.ca.gov/. It is acceptable to submit only the page(s) requiring revision.

For more information about DEP submissions, please visit the K-12 Local Education Agencies, Charter Schools, and Joint Powers Entities (LEAs) webpage at https://sco.ca.gov/aud_k12_lea.html and click on the Data Exchange Portal (DEP) link under Submissions.

If you have any questions regarding this letter or any other LEA audit issue, please contact a member of my LEA Audits staff by email at leaaudits@sco.ca.gov.

Sincerely,



Joel James, Chief
Financial Audits Bureau
Division of Audits

Attachment

cc: Administrator, Highlands Community Charter
Sacramento County Superintendent of Schools
Twin Rivers Unified
Raquel Tucker, Education Fiscal Services Consultant
California Department of Education

Pages 200-230 Excluded

Exhibit Q

TwinRivers
UNIFIED SCHOOL DISTRICT

Board of Trustees

Christine Jefferson
President

Sascha Vogt
Vice President

Michael Baker
Clerk

Emmanuel Amanfor
Member

Stacey E. Bastian
Member

Basim Elkarra
Member

Sharon Reichelt
Member

Superintendent

Tu Moua Carroz, Ed. D.

To inspire each student to extraordinary achievement every day!

August 6, 2026

VIA OVERNIGHT DELIVERY AND EMAIL

Jonathan Raymond, Executive Director
Highlands Community Charter and Technical Schools
1333 Grand Ave.
Sacramento, CA 95838
jonathan.raymond@hccts.org

Highlands Community Charter and Technical Schools Board of Directors:
Matt Levesque – matt.levesque@hccts.org
Symia Stigler – symia.stigler@hccts.org
Crystal Sheffield – crystal.sheffield@hccts.org
Suleiman Shetab – suleiman.shetab@hccts.org

RE: Notice of Violation Pursuant to Education Code Section 47607
California Innovative Career Academy Charter School

Dear HCCTS Board of Directors and Mr. Raymond:

With this letter, the Twin Rivers Unified School District ("District") Board of Trustees ("Board"), as the chartering authority of California Innovative Career Academy Charter School ("CICA" or "Charter School"), is providing this Notice of Violation and a reasonable opportunity to remedy the violations stated herein, pursuant to Education Code section 47607 and Title 5, applicable California Code of Regulations.

In accordance with Title 5, section 11968.5.2(a) and (b), of the California Code of Regulations ("Section 11968.5.2"), the District provides this Notice of Violation to CICA's governing body at least seventy-two (72) hours prior to the District's **August 11, 2026**, Board Meeting during which the Board will consider whether to issue this Notice of Violation in accordance with applicable law.

In conformity with Section 11968.5.2(a), CICA is hereby provided with notice of the following proposed action by the Board:

> **PLEASE TAKE NOTICE** that at or about **6:00 p.m.** on **August 11, 2026**, the Twin Rivers Unified School District Board of Trustees will hold a meeting at the District Offices, 5115 Dudley Blvd., McClelland Park, California, and consider whether to issue this Notice of Violation under Education Code section 47607, based upon CICA's material violation of the conditions, standards, or procedures of its Charter, and violation of law.

All relevant documents related to the proposed action to issue the Notice of Violation are attached as Exhibits. CICA is in material violation of the conditions, standards, or procedures set forth in its Charter, and in violation of the law as further described below.

I. BACKGROUND

On or about June 25, 2019, the Board conditionally approved the petition for the establishment of CICA with a give-year charter a term from July 1, 2019, through June 30, 2024 ("Charter"). Per Education Code section 47607.4, CICA's Charter was automatically extended through June 30, 2027, by operation of law. *(A copy of CICA's current Charter is attached as Exhibit A)*. CICA is operated and governed independently by Highlands Community Charter and Technical Schools ("HCCTS"), a California nonprofit public benefit corporation, and its Board of Directors.

As part of its oversight duties as chartering authority, the District is responsible for monitoring the fiscal condition of CICA and whether it is operating in compliance with the conditions, standards, or procedures set forth in its Charter, meeting or pursuing the pupil outcomes identified in its Charter, engaging in fiscal mismanagement, and complying with the law. (Ed. Code, § 47607(f).) Specifically, Education Code section 47607(f) provides the following:

> A charter may be revoked by the chartering authority if the chartering authority finds, through a showing of substantial evidence, that CICA did any of the following:
>
> (1) Committed a material violation of any of the conditions, standards, or procedures set forth in the charter.
> (2) Failed to meet or pursue any of the pupil outcomes identified in the charter.
> (3) Failed to meet generally accepted accounting principles or engaged in fiscal mismanagement.
> (4) Violated any law.

The District has determined that CICA materially violated the conditions, standards, and procedures of its Charter, and violated the law as set forth below, warranting issuance of this Notice of Violation. Relevant documents are attached to this Notice of Violation as Exhibits.

This Notice of Violation ("Notice") sets forth:

(1) CICA's alleged specific material violations of a condition, standard, or procedure set out in the CICA Charter pursuant to Education Code section 47607(f)(l), and the specific provisions of law that CICA allegedly failed to follow pursuant to Education Code section 47607(f)(4);

(2) All evidence relied upon by the chartering authority in determining CICA engaged in any of the acts or omissions identified in the Notice of Violation, including the date and duration of the alleged violations, showing the violations are both material and uncured, and that the alleged violations occurred within a reasonable period of time before a notice of violation is issued; and

(3) The period of time that the chartering authority has concluded is a reasonable period of time for CICA to remedy or refute the identified violations. In identifying the time period that will serve as CICA's reasonable opportunity to remedy the identified violations, the District has considered the amount of time reasonably necessary to remedy each identified violation.

(Cal. Code Regs, tit. 5, § 11965(f)(1)-(3).)

Accordingly, the District hereby places CICA on notice that should it fail to submit to the District a detailed, written response addressing the identified violation which shall include the refutation, remedial action taken, or proposed remedial action by CICA specific to each alleged violation, on or before **October 9, 2026**, the Board may proceed with the process for revoking CICA's Charter.

II. VIOLATIONS OF LAW

CICA has committed the following violations of law:

A. CICA Failed to File an Independent Financial Audit Report for Fiscal Year 2024-25

Education Code section 47064.33(a) requires that all charter schools file certain periodic financial reports, including annual financial audits. Receipt of these financial reports is needed for the District to perform the oversight duties identified in Education Code section 47604.32(a), including "monitoring the fiscal condition of the charter school." (Ed. Code, § 47064.32(a)(4).) Additionally, Education Code section 47605(m) requires a charter school to, "provide for an annual and independent financial and compliance audit in accordance with Section 41020." Per Education Code section 41020(k)(1):

> On or before January 31 of each year, a report of each local educational agency audit for the preceding fiscal year shall be filed with specified entities, as follows: [...]

> (B) For charter schools, with its chartering authority, the Superintendent, the Controller, and the county superintendent of schools of the county in which the charter school is located, unless the county board of education of the county in which the charter school is located is the chartering authority.[1]

Despite repeated communications, multiple extensions, and numerous opportunities to achieve compliance, CICA has failed to file its 2024–25 annual independent financial audit report as required by law. As of the date of this Notice, the required audit remains outstanding.

Throughout its communications with the District regarding both the 2023–24 and 2024–25 audits, HCCTS has identified various circumstances that it contends contributed to delays in completing the required audit, including issues involving prior auditors, the State Controller's review processes, contracting delays, and the selection of a new independent audit firm. However, the obligation to ensure completion and timely submission of the annual independent financial audit rests with HCCTS as the entity responsible for operating CICA in accordance with applicable law. Accordingly, HCCTS' statutory responsibility remains regardless of changes in leadership, staffing transitions, prior audit findings, contractual disputes, or operational challenges. While such circumstances may affect how HCCTS fulfills its legal obligations, they do not relieve the organization of its continuing duty to ensure compliance with mandatory statutory reporting requirements.

The annual independent audit serves a critical public accountability function by providing an independent evaluation of the Charter School's financial statements, internal controls, and compliance with applicable law. Unlike financial reports prepared by the CICA itself, the annual audit provides independent assurance regarding the Charter School's financial condition and the administration of public funds. CICA's failure to provide its annual audit report for the 2024-25 fiscal year, hinders the District's ability to properly carry out its duties as chartering authority to oversee the Charter School's operations and monitor its fiscal condition. Without a completed audit, the District is deprived of one of the principal oversight mechanisms established by law for independently evaluating the Charter School's fiscal condition and determining whether public funds are being administered in accordance with applicable legal requirements.

The District's inability to review the required audit is particularly significant in this matter. On March 23, 2026, the California Department of Education ("CDE") notified HCCTS that they had

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[1] This content in Education Code sections 47605 and 41042 reflects changes effective July 1, 2026. The prior version of Education Code section 47605(m) in effect at the time CICA was required to submit its audit report for the 2024-25 fiscal year by December 15, 2025 provided: "A charter school shall transmit a copy of its annual, independent financial audit report for the preceding fiscal year, as described in subparagraph (I) of paragraph (5) of subdivision (c), to its chartering authority, the Controller, the county superintendent of schools of the county in which the charter school is sited, . . . and the department by December 15 of each year." CICA is out of compliance with both the prior and current version of Education Code section 47605(m) given that to date it has not filed an annual independent financial audit for the 2024-25 fiscal year.

been notified of the State Controller's Office rejection letter regarding Highlands Community Charter School ("HCCS") 2023-24 audit report. (*See Exhibit B, March 23, 2026, correspondence from CDE.)* In the CDE's March 23 communication they noted that CICA was "...included in the Highlands audit report." The communication further stated, "*Without a completed audit report for FY 2023–24, the CDE does not have the documentation necessary to process CICA's determination of funding request. As a result, CICA's determination of funding request will not be on the agenda for the Advisory Commission on Charter Schools meeting on April 7, 2026.*" As of the date of this Notice, the District has not received any evidence that CICA's funding determination has been processed. Without the funding determination, CICA cannot receive state apportionment money.

Since CICA's funding determination has not been processed, the District's concern regarding CICA's fiscal stability is significantly heightened. The CDE's March 23 communication also reinforces the importance of obtaining a timely and compliant 2024–25 audit so the District can evaluate CICA's fiscal condition and verify compliance with applicable law.

During the 2025-26 school year, while conducting annual oversight activities, the District identified ongoing fiscal concerns, including projected deficit spending, reserve depletion, debt obligations, multi-year financial projections, attendance reporting, instructional minute compliance, and other fiscal matters ordinarily addressed through the annual audit process. *(See Exhibit C, May 5, 2025 Second Interim Technical Review Summary.)* The continued absence of the required financial audit materially impairs the District's ability to assess these issues and fulfill the oversight responsibilities required by Education Code section 47604.32.

CICA's failure to submit the 2024–25 annual independent financial audit report cannot be viewed in isolation. Rather, the circumstances surrounding both the 2023–24 and 2024–25 audit cycles demonstrate a continuing pattern of noncompliance with HCCTS' legal responsibilities. As of the date of this Notice, the CICA 2023–24 audit has not yet been accepted by the State Controller's Office, and the 2024–25 audit likewise remains outstanding. The continuation of these deficiencies under new leadership is significant because it demonstrates that the underlying compliance issues have persisted despite repeated communications, multiple extensions, and substantial opportunities afforded to HCCTS by the District to achieve compliance.

As reflected in the enclosed 2024-25 Independent Audit Report Communication Log and the series of documents referenced therein *(see Exhibit C)*, the District actively worked with HCCTS over an extended period to facilitate compliance. The significance of the Communication Timeline demonstrates that despite repeated accommodations by the District, multiple extensions, and numerous assurances from HCCTS that compliance was forthcoming, CICA has failed to satisfy one of its most fundamental statutory obligations.

III. VIOLATIONS OF CHARTER

CICA violated the following conditions, standards, or procedures set forth in its Charter:

A. CICA Failed to File an Independent Financial Audit Report for Fiscal Year 2024-25

The CICA Charter on page 29 states:

> An annual independent fiscal audit of the books and records of CICA will be conducted as required by Education Code Sections 47605(b)(5)(I) and 47605(m).
>
> [...]
>
> It is anticipated that the annual audit will be completed within six months of the close of the fiscal year. The annual audit will be completed and forwarded to the County Superintendent of Schools, the State Controller, and to the CDE by the 15th of December of each year.
>
> (Emphasis added.) *(Exhibit A.)*

The CICA Charter on page 44 states:

> 2. By December 15, an interim financial report for the current fiscal year reflecting changes through October 31. Additionally, on December 15, a copy of CICA's annual, independent financial audit report for the preceding fiscal year shall be delivered to the State Controller, State Department of Education and County Superintendent of Schools.
>
> (Emphasis added.) *(Exhibit A.)*[2]

As outlined by the evidence provided above and attached as Exhibits, by failing to file an annual independent financial audit report for the 2024-25 fiscal year, CICA has materially violated the conditions, standards, or procedures set forth in its Charter.

IV. CONCLUSION AND REMEDY PERIOD

Please be advised that the District views CICA's material violations of the conditions, standards, or procedures of its Charter, and violations of law as grounds to issue this Notice of Violation and the District may pursue further steps towards revocation of CICA's Charter if these violations are not remedied.

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[2] Although Education Code sections 47605 and 41020 have been revised effective July 1, 2026, to change the date by when a charter school's annual financial audit report must be filed, the fact remains that as of the date of this Notice, CICA has not filed an annual independent financial audit for the 2024-25 fiscal year in violation of its Charter.

Section 11968.5.2(c) describes a charter school governing body's obligation once a Notice of Violation is received:

> Upon receipt of a Notice of Violation, the charter school's governing body, as described in the school's charter, if it chooses to respond, shall take the following actions:
>
> (1) Submit to the chartering authority a detailed, written response addressing each identified violation which shall include the refutation, remedial action taken, or proposed remedial action by the charter school specific to each alleged violation; the written response shall be due by the end of the remedy period identified in the Notice of Violation; and
>
> (2) Attach to its written response supporting evidence of the refutation, remedial action, or proposed remedial action, if any, including written reports, statements, and other appropriate documentation.

The District is providing HCCTS with a reasonable remedy period of up to and including **October 9, 2026**, to provide the written response described above.

The reasonable remedy period is based in part upon HCCTS' own representation regarding the time it needs to achieve compliance. In HCCTS' July 6, 2026 correspondence to the District, it acknowledged that the 2024–25 annual independent financial audit report remained outstanding and requested an extension of the submission deadline to September 30, 2026, explaining that its independent auditor had committed to finalizing the audit report during September 2026. *(See Exhibit C.)* In establishing a remedy period ending October 9, 2026, the District has afforded HCCTS time beyond the extension deadline it requested for submission of its required audit. This deadline is not intended to extend HCCTS' requested completion deadline; rather, it provides HCCTS with a reasonable administrative review period in the event the audit is completed by its auditor near the end of September, allowing sufficient time for HCCTS to receive and review the report.

The District therefore concludes that the remedy period is reasonable under the circumstances as it is based upon the timeline proposed by HCCTS itself while also providing HCCTS with sufficient time to receive and review the report if needed.

As a result, and since the District views CICA's material violations of its Charter and violations of law as grounds for revocation, the District has determined that the point has been reached where it is necessary to initiate the first step in the formal revocation process with the issuance of a Notice of Violation per Education Code section 47607(g) and Title 5 of the California Code of Regulations, section 11968.5.2.

Sincerely,

Dr. Tu Moua Carroz
Superintendent

cc: David Gordon, Sacramento County Superintendent of Schools (dgordon@scoe.net)

Enclosures: Exhibits A - C

Pages 9-96 Excluded