Table A
Context for the State Auditor's Legislative Recommendations

RELEVANT ISSUE IN STATE LAW	CONTEXT IN THE REPORT	RECOMMENDED LEGISLATIVE ACTION
Quality of Education		
State law does not include a maximum allowable **student-to-teacher ratio** for classroom-based adult-serving charter schools.	For fiscal year 2023–24, we calculated that HCCS had a **student-to-teacher ratio of 51:1**, which far surpasses the student-to-teacher ratios and maximum class sizes of neighboring schools and school districts.	The Legislature should consider establishing a maximum allowable student-to-teacher ratio for classroom-based adult-serving charter schools and establish a fiscal penalty for schools that exceed this maximum allowable student-to-teacher ratio.
Student Outcomes		
State law exempts charter schools that provide instruction in exclusive partnership with a WIOA organization from the requirement that its students make **satisfactory progress** towards a high school diploma in order to receive funding.	HCCS and CICA have **poor student outcomes**, including a 2.8 percent graduation rate for HCCS and a 16.9 percent graduation rate for CICA.	The Legislature should amend state law to require charter schools that provide instruction to adults in exclusive partnership with WIOA to be subject to the requirement that their students make satisfactory progress toward a high school diploma.
State law requires charter high schools to administer the California Assessment of Student Performance and Progress (CAASPP) for English and Math in **only the 11th grade**.	Highlands **avoids participating** in the English and Math portions of the CAASPP **by not offering the 11th grade**, when the English and Math assessments are legally required to be administered.	The Legislature should expand state law to require charter high schools that do not offer 11th grade to administer the CAASPP English and Math assessments to students in the 12th grade.
Oversight		
State law does not specify whether chartering authorities must conduct site visits to each school site location each year for **multisite charter schools**.	In fiscal years 2020–21 and 2021–22, Twin Rivers **only visited a handful** of Highlands' school sites for its annual oversight reviews.	The Legislature should clarify whether chartering authorities must conduct onsite visits to each school site location each year for multisite charter schools.
State law does not specify whether a school district may charge **oversight fees** of up to the maximum of 3 percent of revenue generated from all charter school sites, even if the district only provides rent-free facilities at limited locations.	Twin Rivers **cannot justify** the $12.9 million in oversight and facility fees it charged to Highlands from fiscal year 2019–20 through 2023–24.	The Legislature should specify in state law whether chartering authorities are allowed to charge up to 3 percent in oversight fees for revenue generated from site locations wherein the chartering authority does not provide the charter school with substantially rent-free facilities.
State law does not direct CDE to take specific action against chartering authorities that have allowed the charter schools they authorize to engage in violations of law through a **lack of oversight**.	Because many of the issues we have discussed in this report, as well as the issues raised in the 2018 FCMAT audit, are violations of law and Highlands' charters, we question why Twin Rivers has not issued notices of violation to Highlands.	The Legislature should consider giving CDE the ability to establish a process to monitor chartering authorities, require corrective action for identified oversight deficiencies, and levy financial sanctions against chartering authorities that fail to conduct necessary oversight.
State law authorizes county offices of education to conduct audits of charter schools, but it **does not explicitly specify the next steps** after the audit beyond providing the report to the charter school's board and chartering authority, and obtaining the school's response.	Sacramento COE **took limited actions** to ensure that Highlands and Twin Rivers addressed FCMAT's findings.	The Legislature should consider requiring county offices of education to determine whether audit findings are remedied within a reasonable amount of time. The Legislature should also require the county office of education to notify the chartering authority and CDE of each audit finding that it determines is unremedied in order to facilitate enforcement activities such as the issuance of a notice of violation by the chartering authority or any necessary adjustments to apportionment by CDE.

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State law granting oversight power to county offices of education does not explicitly direct them to **monitor a school district's charter oversight activities**.	Sacramento COE does not review how Twin Rivers fulfills its charter oversight responsibilities. It had appeared that to Sacramento COE that Twin Rivers was conducting oversight.	The Legislature should consider explicitly directing county offices of education, as part of their fiscal oversight responsibilities, to review how chartering authorities that authorize charter schools within their county fulfill their charter school oversight responsibilities.
State law does not provide fiscal penalties for charter schools regarding teacher **misassignments**.	We identified 22 of the 27 teachers that had a teaching credential but did not have the appropriate credential for the setting or course they were teaching.	The Legislature should consider requiring CDE, in collaboration with the CTC, to assess fiscal penalties to chartering authorities when the charter schools they authorize repeatedly or consistently fail to address teacher misassignments.

Source: State law and auditor analysis.