



July 7, 2023

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Dr. Linda Darling-Hammond
President, State Board of Education
1430 N Street, Suite 5111
Sacramento, CA 95814-5901

RE: CTA COMMENTS REGARDING ITEM #8: Consideration of Requests for Determination of Funding with "Reasonable Basis"/Mitigating Circumstances 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.

Dear State Board of Education President Darling-Hammond and SBE Members,

On behalf of the over 310,000 members of the California Teachers Association (CTA), we must express our continued concerns with the funding determination process for Nonclassroom-based charters (NCB). This process is broken and does not provide the level of transparency needed for the Advisory Commission on Charter Schools (ACCS) nor the State Board of Education (SBE) to provide appropriate public oversight on these funding determinations.

The disconnect between the state level process, the NCB, and the charter authorizer continues to be significant. This disconnect opens the door to bad actors such as the A3 charters and other groups who have taken advantage of loopholes. Just over a year ago it was announced the leaders of the A3 Charter Scandal, despite a theft of hundreds of millions of dollars, will not spend a day behind bars ([Voice of San Diego Article](#)).

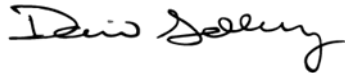
The ACCS commissioners continue to raise significant concerns regarding the funding determination process, the intersection of the authorizer, and the state level process. At the end of the February 2023 meeting, Chair Walsh expressed "it is clear that there is still work to be done on the process and the systems and becoming clearer about the charter authorization responsibility."

The lack of a role for the charter authorizers within the NCB funding determination process continues to be a significant issue.

CTA appreciates that the California Department of Education (CDE) has continued with the overview of mitigating circumstances for each of the NCBs in the item.

CTA looks forward to working with the CDE, SBE and ACCS to fix this broken process before it is too late.

Sincerely,

A handwritten signature in black ink, appearing to read "David Goldberg". The signature is fluid and cursive, with the first name "David" and last name "Goldberg" clearly distinguishable.

David Goldberg, President
California Teachers Association

C: CTA Executive Officers

Teri Holoman, Associate Executive Director, CTA Governmental Relations

Lori Easterling, Manager, CTA Legislative Relations

Members, State Board of Education

Brooks Allen, Executive Director, State Board of Education

CTA Liaisons to the State Board of Education

