



**February 6, 2025**

Gordon Mosher  
Douglas County School District  
620 Wilcox St.  
Castle Rock, CO 80104

Subject: Request for Revisions to Policy LBD-R

Dear Mr. Mosher,

On behalf of the Alliance of Douglas County Charter Schools, we are writing to respectfully request revisions to the proposed changes for DCSD Board Policy LBD-R concerning the process for charter school applications, replication, expansion, and renewal within the Douglas County School District. We seek to collaborate with the District in shaping policies that honor the District's responsibilities as an authorizer, which require oversight of these processes, as well as offer appropriate autonomy to charter schools. To that end, we believe that specific modifications to the proposed policy changes will ensure a more equitable, transparent, and efficient system for both charter schools and the District.

Below, we outline our proposed revisions to Policy LBD-R:

- **Proposed Revision #1:** On page 9, section 4. (c): Edit language to read “at least two, *and no more than three* individuals who are members of the District’s Accountability Committee.”
- **Proposed Revision #2:** On pages 12-13: Charter School Expansion Procedure **Strike** the section on page 13 which currently reads as follows, including the ‘callout’ box. In order to meet the objective of ensuring schools work with local municipalities on expansion projects, we propose replacing this language with verbiage such as “*charter schools considering expansion should collaborate with local municipalities and must comply with all local, state, and federal rules and regulations, including obtaining all applicable permits.*”  
~~When considering an expansion application, applicants should evaluate their readiness for expansion in order to ensure that the expansion is likely to result in the addition of high-quality education options for students and families. Readiness for expansion is defined as an applicant who provides:~~  
~~A clear and compelling mission~~  
~~A strong educational program with demonstrated effectiveness~~ ~~Evidence of community need and support~~  
~~A solid business and financial plan~~  
~~Effective Governance and management structures and systems~~  
~~Strong and stable leadership, demonstrating diverse and necessary capabilities~~

~~Clear evidence of the applicant's capacity to execute its plan successfully.~~

~~Depending on the scope of the proposed expansion, applicants may be required to host a geographic meeting in the community of the current school wishing to expand. The time and place of the geographic meeting would be determined by the applicant's Board of Directors and communicated with DCSD Choice Programming to allow for DCSD staff to be present. Applicants will be asked to share information about the proposed expansion and address questions and concerns from the community.~~

~~An application for expansion will be submitted to the DCSD Office of Choice Programming for review. This review may include various departments, depending on the scope of the application. Applicants may be asked to provide a summary of the proposed expansion to the DCSD Board of Education during a public hearing at a regularly scheduled DCSD Board meeting. Any request for a summary to the Board of Education will come with advance notice.~~

- **Proposed Revision #3: Under the section Charter School Replication Procedure:**  
We request that the District strike all language in this section *other* than two procedural sections -- 1) the introduction section (defining replication in DCSD) and 2) the procedural items outlined on pages 17 and 18 beginning with "Charter schools that are authorized in another district..." And ending with "...the next school day." We request that all other language in this section, which constitute restrictions on enrollment, be stricken, in compliance with Colo. Rev. Stat. § 22-30.5-109.

We strongly believe that these changes will create a more streamlined, consistent, and effective process for both the District and charter schools. We have appreciated the opportunity to have met with District leadership to discuss these proposals in more detail and explore how we can work together toward an updated version of Policy LBD-R that is aligned with our shared goals of educational success for all students.

Thank you for considering this request; we look forward to continued partnership with DCSD staff and welcome questions or requests for clarification.

Sincerely,

Board of Directors  
The Alliance of Douglas County Charter Schools