TO: Illinois State Board of Education

FROM: Quest Charter Academy

RE: Memorandum of Appeal

DATE: February 14, 2024

APPEAL OF DECISION TO NOT RENEW CHARTER

This Appeal follows Peoria Public School District 150's ("PPS") denial of Quest Charter Academy's ("Quest") Charter Renewal Application on January 22, 2024.

I. Introduction

Quest was first chartered in 2010, borne out of a concern shared by community business leaders and PPS that the Peoria community faced an imminent threat of shortages of skilled workers, particularly in the fields of science, technology, engineering, and mathematics. In the intervening years, Quest has had its charter renewed twice and extended once by PPS. During each of these renewal or extension events, it has become apparent that Quest and PPS increasingly disagree as to what is in the best interests of students and Quest's capacity to deliver such an educational experience.

On January 22, 2024, the Board of Education for PPS denied Quest's renewal application. At that meeting, by a 5-1 vote, the Board adopted the following agenda item: "Option 2 – Deny Quest's 5-year Renewal Application on the grounds that (a) Quest's performance fell short of mutually established academic goals, (b) As a result of not meeting mutually established performance goals, Quest's continued existence will NOT be in the best interest of students, and (c) Quest has failed to meet applicable charter school laws with regard to the statutory 75% threshold for "certified" teaching staff in its workforce." Upon notice to the State Board of Education, PPS did not specifically enumerate any particular violations other than what was provided in that agenda item. Because the specific performance goals that were not met were not included in that notice, Quest will address those concerns and allegations PPS articulated through its Preliminary Performance Report in advance of the rechartering process, ² the Review and Recommendation submitted to the PPS Board by the PPS Administration after PPS held its public hearing, ³ the Administrative Memo submitted to the PPS Board after the public hearing, ⁴ and the

¹ PPS BOE Agenda, 1/22/2024

² PPS Preliminary Performance Report

³ PPS Ex. 10 – Review and Recommendations

⁴ PPS Ex. 11 – Administrative Memo

presentation by PPS's legal counsel before the vote to approve or deny the charter renewal.⁵ These sources allege violations of the charter schools law required ratio of certified instructors and violations of the Charter Agreement, primarily pertaining to pupil performance objectives. The pupil performance objectives that PPS alleged were not met included Quest's:

- (1) summative academic designation for its middle school,
- (2) growth on the IAR for reading,
- (3) growth for the school day administration of the PSAT-10,
- (4) growth on the Illinois Science Assessment,

- (5) growth on school day administration of the SAT,
- (6) attendance rates,
- (7) Ninth Grade on Track rates, and
- (8) 4-year graduation rates.⁶

Further, PPS enumerated additional concerns not required by statute, regulation, or contract, but which PPS alleged indicate that Quest is not in the best interest of students. These concerns include Quest's teacher retention, alleged failure to focus on STEAM instruction, student discipline, and its perception of declining enrollment.

Under Illinois law, a local school board may not "arbitrarily or capriciously revoke or not renew a charter." 105 ILCS 5/27A-9(c). A charter must be renewed unless the local school board can clearly demonstrate that the charter school "(1) [c]omitted a material violation of any of the conditions, standards, or procedures set forth in the charter; (2) [f]ailed to meet or make reasonable progress toward achievement of the content standards or pupil performance standards identified in the charter; (3) [f]ailed to meet generally accepted standards of fiscal management; [or] (4) [v]iolated any provision of law from which the charter school was not exempted." *Id.* The State Board may reverse the local board's decision to not renew a charter if the State Board finds that the charter school (i) is in compliance with the Charter Schools law and (ii) is in the best interest of the students it is designed to serve.

Quest disagrees with PPS's allegations of non-compliance and strongly asserts that Quest's Charter Renewal is in the best interests of the students that it is designed to serve. Quest has met or made reasonable progress toward all of its academic goals, even in light of their numerosity, ambitiousness, and the deleterious impact of the pandemic on their achievement. Because PPS has not clearly demonstrated that there was a failure to make reasonable progress toward the achievement of the pupil performance standards or a violation of law, its decision to deny renewal should be reversed.

⁶ PPS Ex. 12 – Presentation

⁵ PPS Ex. 12 - Presentation

II. Bargaining History

In 2010, Quest was chartered for a five-year term, commencing on July 1, 2010, and ending on June 30, 2015. In that first year, Quest served 225 students in fifth through seventh grade. A grade was added each year until Quest achieved its full capacity of 600 students in grades 5-12 in the 2015-2016 school year. Quest was initially managed by Concept Schools, a not-for-profit charter management organization. In the 2014-2015 school year, however, Quest's board, the Peoria Charter School Initiative, voted to assume local control and terminate the agreement with Concept Schools. Quest has operated pursuant to this local control since that time. PPS and Quest's board entered a renewed Charter Agreement for a five-year term in the spring of 2015. From 2015 to 2018, Dr. Nicole Wood served as the executive director for Quest. Dr. Taunya Jenkins has served as executive director from 2018 to the present. In the spring of 2019, Quest requested another five-year charter renewal. PPS, instead, granted a two-year renewal for the school years 2020-2021 and 2021-2022 (the "2020-2022 Charter Agreement"). In light of the pandemic, the Charter Agreement was extended for two more years, ending on June 30, 2024 (the "2022-2024 Extension").

During the negotiations for charter renewal in 2019 and Quest's request for a charter extension in 2021, it was apparent that PPS and Quest did not agree on what constituted reasonable goals for pupil performance. At that time, PPS insisted on a two or two and half percent growth benchmark across six indicators, a graduation rate and rate of Ninth Grade on Track equivalent or exceeding state averages, and a 94 percent attendance rate. Recognizing that these goals were aggressively ambitious and beyond the performance capabilities of most schools in PPS, Quest attempted to negotiate more realistic goals; however, PPS declined, indicating Quest could either accede to the unlikely goals or not have a charter agreement. Given no choice, Quest requested that the contract at least provide that PPS's Board of Education would consider evidence of growth towards any performance metrics not fully achieved to which PPS agreed.

During the conclusion of the initial term of the charter agreement in 2021, Quest again revisited these goals and requested reconsideration, especially in light of the unexpected challenges to and the impossibility of performing some of the contractual requirements due to the Covid-19 pandemic. Quest believed that goals that were once considered aggressively ambitious during typical educational circumstances were altogether unachievable in the post-pandemic educational environment. Quest's request for reconsideration of the pupil performance goals was rejected by PPS, but a two-year extension of the Charter Agreement, on the same terms as the 2020-2022 Contract, was granted.

Of course, the Covid-19 pandemic had a deleterious impact on student learning throughout the city, state, and country. In the 2022-2024 Extension, the parties recognized through recital that "said effects of the COVID-19 pandemic included but were not limited to: (a) the modification of

⁷ 2020-2022 Charter Agreement

⁸ 2022-2024 Extension

certain student performance and reporting indices by the State of Illinois during the pandemic, such as school designation criteria, suspension of IAR testing in Spring of 2020, (b) the pandemic prevented Quest from conducting NWEA testing in the spring and fall of 2020 which impacted progress performance monitoring, and (c) other family and community challenges faced by students which manifested themselves in low student engagement." To enumerate all of the ways in which the Covid-19 impacted learning, student engagement, and students' social emotional needs would be beyond the scope of this appeal, however, it is necessary to identify some of the ways in which the pandemic upset the educational landscape.

Indeed, during the term of the 2020-2022 Charter Agreement, students' educational experience was turned upside down. For many students, school typically provides a bedrock of stability – providing more than just academic education, but also reliable food services, social services and resources, and a relief from familial care-taking responsibilities. Those benefits of school were not available to students for nearly the two full years of the 2020-2022 Charter Agreement. Quest and PPS students learned remotely for all of the 2020-2021 school year, and three quarters of the 2021-2022 school year. There were differences between the approaches of Quest and PPS, including the delivery and expectations of remote instruction, but undoubtedly, this experience took its toll on most, if not all, students from Quest and PPS alike.

Given the Board's agreement to consider growth toward any goal not actually met in the 2020-2022 Charter Agreement, and the recognition by the parties of the deleterious impacts of the pandemic on student educational outcomes set forth in the 2022-2024 Extension, Quest anticipated that PPS would give significant deference to growth and weigh Quest's performance during the 2022-2023 school year and the beginning of 2023-2024 school year within that context.

Pursuant to the Charter Agreement, PPS and Quest collaboratively developed a Re-Chartering Process and Timeline for the 2024 charter renewal application. Pursuant to the agreed timeline, PPS provided Quest with its Preliminary Performance Report on August 31, 2023. Quest timely submitted its Response to the Preliminary Performance Report and its Renewal Application on November 30, 2023. At PPS's regular meeting of its Board of Education on December 11, 2023, Quest was given a forty-five-minute window to present its application for charter renewal to the Board. PPS's administrative staff offered no evidence or opinion into evidence during the public hearing, nor were there significant questions asked or evidence offered against Quest's performance or rechartering during the public hearing. Quest representatives received several questions from PPS Board of Education members after the December 11, 2023, presentation, which were responded to in-turn.

On December 4, following a request from Quest's Board President Glenn Ross for any final performance review that PPS administration may provide to its Board, Dr. Ikejiaku, PPS's Associate Superintendent for Human Resources, responded to Glenn Ross in an email that "there

⁹ PPS Preliminary Performance Report

¹⁰ Quest Charter Renewal Application

[was] no final performance report at [that] point in the renewal process." Although PPS was on notice that Quest requested to review any final report submitted to the Board in the interest of transparency and so that Quest would have a meaningful chance to respond, no such report was ever provided to Quest.

At the PPS Board of Education regular meeting on January 22, 2024, counsel for PPS made a presentation to the PPS Board of Education that correlated with a memorandum provided to the Board and dated January 21, 2024, both of which concluded with a recommendation to deny Quest's Charter Renewal Application. The memorandum had not been presented during the prior public hearing and Quest had not been apprised of the existence of the memoranda or presentation prior to the publication of the January 22, 2024, PPS Board of Education Agenda. As detailed further throughout this memorandum, these recommendations included complaints and assumptions against Quest that had not been addressed in the Preliminary Performance Report.

PPS's acceptance and consideration of materials, information, complaints and conclusions offered outside of the public hearing directly contradicted PPS's statutory obligation to "convene a public meeting to obtain information to assist the board in its decision to grant or deny the charter school proposal." 105 ILCS 5/27A-8(c). That meeting took place on Monday, December 11, 2023. Without knowledge of the full complaints lodged against Quest by PPS, however, there was no way in which Quest could meaningfully respond to alleged violations of the Charter Agreement to assist itself in supporting its application for charter renewal.

Since January 22, 2024, PPS Administration has made an immediate and concerted effort to communicate its school closure plans to students and families and communicate job prospects to Quest teachers, despite its knowledge of a probable appeal. PPS's communication to Quest families includes February 8 and 9, 2024, deadlines that PPS claimed were required for students to enroll at PPS schools for next school year to coerce families to make premature choices regarding Quest's lottery. Quest has been treated as a competitor, not a partner, throughout this charter term, and these efforts to thwart Quest's future prospects further demonstrate that relationship. Quest has provided the City of Peoria with an open-enrollment, tuition-free, alternative choice to PPS for the last 14 years, and this decision to deny Quest's charter renewal is the result of a targeted and manufactured plan to close a school that has provided much to its students and Peoria at-large, and it has much more to give.

III. Statutory Compliance

As provided by the School Code, the State Board should reverse PPS's decision not to renew Quest's charter. The State Board may do so when it finds that the charter school (i) is in compliance with the Charter Schools article of the Illinois School Code, and (ii) it is in the best interest of the students it is designed to serve. Here, Quest's operations, both with regards to

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¹¹ PPS BOE Agenda, 1/22/2024

instructor certification and student discipline, comply with the Illinois School Code, and thus the first element is satisfied.

a. Quest Complies with Teacher Certification Requirements.

Under the Charter Schools law, "[a]t least 75% of the individuals employed in instructional positions by the charter school shall hold teaching licenses issued under Article 21B of [he School Code]. Charter schools may employ non-licensed staff in all other positions." 105 ILCS 5/27A-10(c-10). In subsection (c) of the same statute, the law provides that "Charter schools shall employ in instructional positions, **as defined in the charter**, individuals who are licensed under Article 21B of this Code or who possess [other enumerated] qualifications" (emphasis added). The Charter Agreement between PPS and Quest, however, does not further define what constitutes an instructional position. Quest has historically interpreted "instructional positions" to include its principals, math, science, social studies, language arts instructors, and PE instructors. Although, with such a small number of staff, personnel percentages have varied over the term of the charter, Quest has generally maintained at least 75% of licensed staff in those positions. At the time of the January 22, 2024, public meeting, Quest employed 33 instructional staff under this definition between its two buildings. 27 of those 33 positions were filled by certified teachers – a ratio of 75.8% percent – exceeding the statutory threshold.

Although Quest presently complies with the statutory requirement of 75 percent of certified instructional staff, it acknowledges that teachers may be endorsed in Music and Art as well. If those positions are included, Quest has a certified staff of 67.6 percent. This is likely the basis for the discrepancy in certified staff rates between Quest and PPS. Quest, however, has made a commitment to providing these classes, although it is not obligated to do so under state law or the charter agreement. Quest feels such programing is vital to an educational experience that serves the whole child and Quest's unique student population. To remove such valuable course offerings simply to obtain technical compliance with this provision would not be in the best interests of students.

Of note, many of Quest's non-certified instructors are persons of color. Although Quest's ratio of certified instructors is diminished by employing these teachers, Quest believes that an instructional staff that is representative of the community it serves is crucial to its mission. Over 47 percent of teachers at Quest are not white, compared to PPS, whose non-white teacher ratio is less than 20 percent. Considering that over 80 percent of PPS students are not white and over 90 percent of Quest students are not white, Quest's efforts towards representation and enriching curriculum should be a mitigating consideration for any technical non-compliance with the certification requirements at issue.

Further, Quest, like many other schools, has had difficulty hiring and retaining qualified teachers. Unfortunately, the teacher shortage continues to worsen nationally, statewide, and locally. Like PPS, Quest has felt the impact of this shortage and strives to maintain compliance with the law and recognizes the importance of a high ratio of highly qualified teachers.

To offset these challenges, Quest has been creative in its efforts to achieve and maintain the required ratio of certified instructors. This includes hiring certified teachers who possess work visas as well as providing teachers with professional and financial support to achieve certification. As a result of these efforts, another two Quest teachers have completed their certification requirements and are waiting for the state website to reflect their certification. Upon certification, these teachers will increase Quest's certified staff percentage to 81.8%. Moreover, many Quest teachers, both certified and not certified, have professional experience in their subject matter, giving their students unique and practical insight into the subjects they teach in a way that teacher certification alone does not guarantee. The diverse background of Quest teachers offers students a unique, practical educational experience that is not typical through traditional teacher licensure and has assisted in providing students a high-quality education despite the challenging hiring environment. Quest is deeply committed to ensuring that its students have access to the highest quality instruction that is simultaneously compliant with Quest's legal obligation, and Quest believes its staff meets and exceeds that standard.

b. Quest Complies with SB100.

PPS expressed concern that Quest's discipline and behavior management data may indicate a violation of Illinois law regarding exclusionary discipline; however, such an insinuation is unfounded. First, Illinois' exclusionary discipline law, known as SB100 (PA 99-456) provides specific procedures when a school institutes exclusionary discipline, including suspensions and expulsions. Although PPS suggested that Quest's discipline metrics were violative of this law, it provided no support or specific circumstances for this allegation. Rather, Ms. Satterly, counsel for PPS, stated that it "potentially violated the spirit of SB100." ¹²

Quest complies with the procedures set forth in Section 10-22.6 of the School Code regarding suspension and expulsion. Further, student discipline at Quest follows the Discipline Procedure set forth in Appendix B of the Charter Agreement. Compliance with this procedure limits "the number and duration of expulsions and suspensions to the greatest extent practicable, and [exclusionary discipline] is only for legitimate educational purposes." 105 ILCS 5/10-22.6(b-5).

PPS also included student discipline as an "Area of Concern" within its "Academic Pillar" in the Preliminary Performance Report. 13 Because there was no allegation of statutory noncompliance within that section, the indicators included in that report will be addressed later in this brief.

IV. Quest is in the Best Interests of Students

The second element required for the State Board to reverse the nonrenewal of a charter is that the charter school must be in the best interests of the students that it is designed to serve. PPS

¹² PPS Ex. 12 – Presentation

¹³ PPS Preliminary Performance Report, p. 3.

alleges that Quest fell short of mutually established goals and as a result, Quest's continued existence is not in the best interests of students.

Notwithstanding PPS's 'all-or-nothing' evaluation, in compliance with the Charter Agreement and the Charter Schools law, Quest has met or exceeded the performance goals set forth in Appendix A to the Charter Agreement, or at least made substantial and reasonable progress towards those goals, each of which will be addressed. Section IV(C) of the Charter Agreement provides that "[t]he parties acknowledge that there may be circumstances that may cause the Charter School to fail to achieve all the goals. The Board values student growth and shall consider Quest's progress towards any goal it does not completely obtain." This clause of the agreement was added by the parties in reaction to the aggressively aspirational performance goals PPS unequivocally demanded during negotiation of the last charter agreement, incorporating the Charter Schools law requirement that a Charter School "meet or make reasonable progress toward achievement of the content standards or pupil performance standards identified in the charter." 105 ILCS 5/27A-9(c)(2).

Although not articulated in the motion adopted by the Board of Education, the administrative documents also questioned Quest's student discipline, fidelity to its mission as a STEAM-focused school, its teacher retention, and its enrollment. Because none of these concerns are statutory obligations, PPS must have included them to establish the students' best interests. Each of these areas have contextual nuance that PPS failed to convey in its correspondence to its Board. As such, each subject will be addressed in turn.

a. Student Performance Compared to PPS

In Superintendent Kherat's memorandum to the Board regarding rechartering, she alleged that "[Quest] has not demonstrated its students perform at a markedly higher level or, at least, significantly higher levels than Peoria Public School students; and (c) it has failed to meet 8 of the 11 academic goals that were mutually agreed upon with the District during the 4 years of the charter term." This reasoning is flawed for several reasons. First, the metric is not, and has never been whether Quest students would perform at "markedly higher" or "significantly higher" levels than PPS students. Second, although the 2022-2023 Illinois Report Card provides that in many areas, Quest does outperform PPS, this comparison ignores that many Quest students come from substantially underperforming schools within PPS and a comparison with PPS as a whole is a misrepresentation of the education those students would actually otherwise receive. To her last assertion – that Quest categorically failed to meet the agreement's goals - such a statement is both a misrepresentation of fact, as detailed later, and fails to comply with PPS's statutory and contractual obligation to acknowledge reasonable growth and progress for any pupil performance goals not fully achieved. In light of the circumstances over the term of the Charter Agreement caused by the pandemic and its resulting aftermath, such an obligation is more important than ever, and the PPS Board of Education was advised to measure Quest's success in a way not provided

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¹⁴ 2022 Charter Agreement

for by law or contract by refusing to consider growth as an indication of statutory and contractual compliance.

It is easy to compare Quest to PPS as a whole. Superintendent Kherat's statement that Quest had "not demonstrated its students perform at a markedly higher level or, at least, significantly higher levels than Peoria Public School students," however, ignores one crucial nuance – that Quest students do not come from all PPS schools equally – almost none come from PPS's top performing schools. Of the four middle schools in PPS that have a higher accountability weighted index for 2022-2023 than Quest, only 3 Quest students would have otherwise been at one of those schools. Similarly, Richwoods High School is the only high school in PPS that has a higher weighted accountability index than Quest's high school, and less than five percent of Quest's high school students (8 students) would have otherwise gone to Richwoods. The comparison to PPS as a whole incorporates these higher performing schools, but in reality, those schools are not generally an option for Quest students; thus, PPS's district-wide comparison is incorrect. Many Quest students and families seek out Quest, not only because of its unique and rich curricular landscape, but also simply as an alternative to their poor performing home schools in PPS that *they* would otherwise attend.

Over 95 percent of Quest middle school students come from seven PPS middle schools – Sterling Middle School, Harold B. Dawson Jr. Middle School, Von Steuben Middle School, Elise Ford Academy, Glen Oak Community Learning Center, Trewyn School and Lincoln School. With very limited exception, each of these schools have lower IAR growth in math and ELA, lower rates of math proficiency, and lower rates of ELA proficiency during the 2020-2021 and 2021-2022 school years and are all designated as Targeted or Comprehensive. See *Figure 1: Middle School Comparison* below. Similarly, over 90 percent of Quest's high schoolers would otherwise go to Peoria High School or Manual High School. Both of these schools have lower composite SAT scores than Quest, with the limited exception of Peoria High School in 2023. Both schools also have substantially lower graduation rates. See *Figure 2: High School Comparison*. Although Quest students will not be permitted to return to those schools under 105 ILCS 5/27A-9(c), this gives context to any comparisons made between Quest and PPS schools.

Figure 1: Middle School Comparison

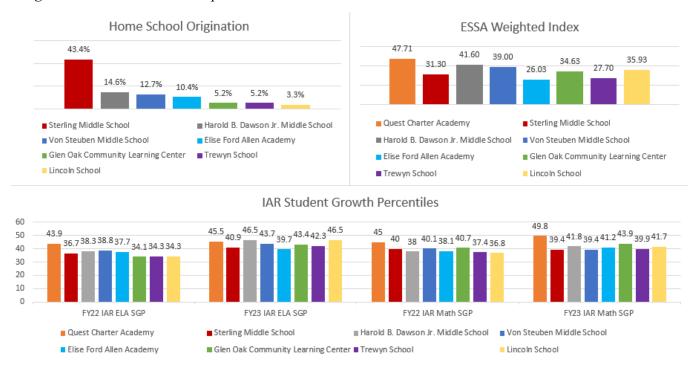


Figure 2: High School Comparison



b. Achievement of Academic Goals

PPS alleges that Quest achieved only 3 of its 11 academic goals. This is both a miscalculation and a misrepresentation based upon incorrect or unsubstantiated data in some areas and which otherwise fails to consider any substantial compliance or reasonable growth toward the aspirational academic goals in compliance with PPS's contractual and statutory obligations. There are, admittedly, student performance metrics that Quest did not fully achieve during the term of the Charter Agreement. There are several reasons for this - many of which have already been addressed. Primarily, many of the pupil performance goals that PPS insisted on, and that Quest stipulated to, were aggressively ambitious. That was true when the agreement was negotiated in 2019, but those goals became even more aspirational in light of the pandemic. It is obvious from Quest's growth in nearly all regards that its systems were effective and that the school has made real, marked growth in its recovery from the setbacks experienced during the pandemic. The following details each academic goal required by the Charter Agreement, PPS's determination of compliance with that goal, and the data demonstrating how Quest achieved or has made reasonable progress towards the achievement of the goal. When coupled with the comparison to Quest students' home schools, it is clear that such achievement and reasonable progress establishes that Ouest is in its students' best interests.

i. Summative Designation

Quest Charter Academy was awarded a "Commendable" designation for FY2023, giving Quest the honor of being among the best performing schools in PPS. This commendation reflects the dedication, hard work, resiliency, and collaborative efforts of Quest's students, educators, staff, and the broader school community. It is a testament to Quest's commitment to providing a high-quality and well-rounded education that prepares its students for success.

The State Report Card website reports Quest as one school serving grades 5-12, and indicates that Quest has "Commendable" designations for each year schools were designated after the pandemic. However, PPS alleges that Quest's middle school received a "Targeted" designation for the 2020-2021 and 2021-2022 school years. Denial of Quest's charter application based on this representation ignores the reality of the circumstances surrounding the accountability designations for these years. As background, in 2018, Quest's middle school received a "Targeted" designation because there was one student demographic group performing at or below the level of the "all students" group in the lowest 5 percent of all schools. That "Targeted" designation created a 4-year monitoring cycle in which a school remains in support status and receives a "Targeted" designation so that improvements can be sustained, even if the subsequent designations would otherwise be commendable or exemplary. Thus, in 2018, Quest's middle school received a "Targeted" designation that could not be changed until 2021-2022 at the earliest, regardless of how well Quest and its students performed. Further, because of the significant disruptions caused by the Covid-19 pandemic, the State Board of Education did not assign traditional accountability designations for

the year 2020-2021. Thus, Quest is perplexed as to what data PPS relies on to find that Quest's middle school received a "Targeted" designation during this time period.

Regardless, Quest was designated "Commendable" for the 2023 school year, a designation that is only shared by two other PPS middle schools (one of which is a selective-enrollment gifted school.) Further, its weighted index score of 47.71 suggests that it performs higher than two of the three PPS high schools. Although four other middle schools (including the gifted school) have a higher index score, two of those have a designation lower than "Commendable" because one or more student groups is performing at or below the level of the "all students" group in the lowest performing 5 percent of schools.

If PPS's decision to not renew is upheld, PPS must place Quest students in a school that is higher performing than Quest under the state's accountability plan. ¹⁵ Because of Quest's diverse student population ¹⁶, it would be contrary to the intent of statute to place students into those two middle schools which have a higher index rating, but a lower summative designation, without first ensuring that the student of an underperforming subgroup is not placed in a school for which the same underperforming group led to the school's lower summative evaluation.

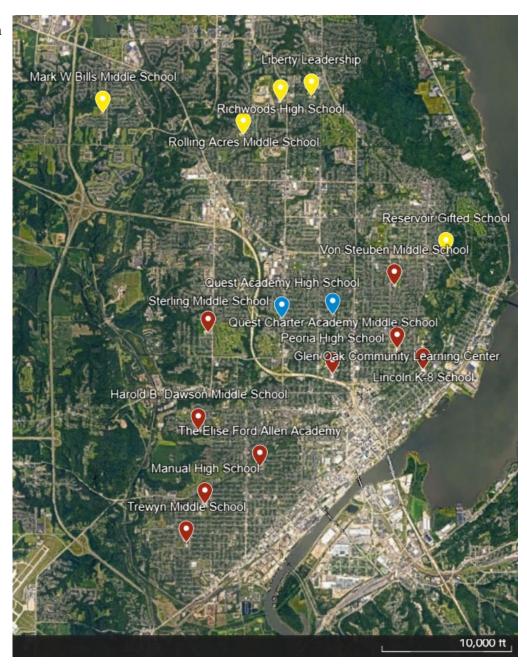
This summative designation and its comparison to other PPS schools further illustrates that Quest does, in fact, serve its students' best interests. When compared to the home schools of the vast majority of Quest's students, Quest outperforms each, both in their summative designation and their weighted index score. Although the law contemplates ensuring that the best interests of students are protected upon charter school closure, most Quest students would be required to be bussed to the other side of Peoria to attend a higher performing school (see *figure 3*) and, in many cases, would not be attending school with their established Quest social group or continue relationships developed throughout their neighborhoods or previous neighborhood schools because they will be required to attend schools without any regard for these existing relationships. A new placement for nearly 400 Quest students would further exacerbate the trauma caused by changes to learning caused by the pandemic and the uncertainty of the closure of their school and this appeal. Such a change in placement will, itself, have a negative impact on students, regardless of whether they are placed in a higher performing school.

¹⁵ 105 ILCS 5/27A-9(c).

¹⁶ Quest's Charter Renewal Application, p. 89.

Figure 3: Location of Schools
Compared to
Quest Charter
Academy's
Weighted Index
under the Every
Student Succeeds
Act accountability
plan

* Red pins indicate PPS schools with a lower Weighted Index Score; Yellow pins indicate PPS schools with a higher Weighted Index Score; Blue pins indicate Quest Charter Academy buildings



i. IAR Growth (as measured by SGP)

The Charter Agreement sets forth a goal of a two percent increase in the growth indicator, the student growth percentile ("SGP"), for math and English-Language Arts ("ELA") on the Illinois Assessment of Readiness ("IAR"), as reported on the Illinois School Report Card.

The Preliminary Performance Review¹⁷ and PPS's Review¹⁸ alleged that Quest did not attain this increase and compares Quest's SGP to the State average of 50 percent. Such a comparison is misleading because the state norm of fifty percent growth has no impact on Quest's reasonable progress towards a two percent increase as required under the Charter Agreement.

Quest agrees with ISBE that recognition of student growth, rather than achievement is the correct metric to evaluate Quest's performance. ISBE provides that the SGP metric is important because it recognizes progress toward and beyond the achievement standard no matter where each student started, instead of only recognizing mastery of a common standard, as proficiency does.¹⁹ This measurement is more equitable as "demographics do not predict growth. Data shows that students of all races, income levels, languages, and disability statuses demonstrate growth across the full range."²⁰ Because Quest's student population is predominately Black and Hispanic, as well as Low Income, this more equitable metric is an appropriate approach to evaluating whether Quest is in the best interest of its students.²¹

Quest has made reasonable progress towards achieving the SGP required by the Charter Agreement in compliance with the Charter Schools Act. No SGP data is available for the 2020-2021 and 2021-2022 school years, but Quest's ELA SGP for 2018-2019 was 41.8. That percentile grew to 43.9 in the 2021-2022 school year, a 2.1-point increase. That percentile continued to grow in the 2022-2023 school year to 45.5, representing an additional 1.6-point increase from the previous year. Although not a full two-percent increase from the previous year, Quest made objectively reasonable progress on ELA IAR, especially in light of the circumstances caused during and existing in the aftermath of the pandemic.

The Charter Agreement also requires two percent increases in math SGP. Again, the Preliminary Performance Report and District Review incorrectly compared Quest's SGP to the state SGP, which by definition, must be fifty percent, rather than the contractual provision of two percent growth year-over-year. In spite of the difficulties presented by the pandemic and remote learning, Quest was able to demonstrate substantial growth during this time. In math, the 2019-2020 report card reported a 42.5 SGP, growing to 45 in 2021-2022 (a 2.5 percentage point increase) and then growing again to 49.8 in 2022-2023, a remarkable 4.8 percentage point increase in one year. Indeed, although the contract did not require it, Quest's SGP is now substantially similar to the State SGP. This year-over-year growth suggests that Quest, in spite of the difficulties that its students and community faced, has met or made reasonable progress towards its academic goals and is in the best interests of its students.

¹⁷ PPS Preliminary Performance Review, p. 5 & 6.

¹⁸ PPS Ex. 10 – Review and Recommendations, p. 19.

¹⁹ Illinois State Board of Education, Illinois Report Card 2022-2023: Growth Percentile – IAR

²⁰ Id.

²¹ Quest's Charter Renewal Application, p. 89.

ii. PSAT 8/9 and PSAT 10

The Charter Agreement set forth a performance goal for 2.5 percent annual increases in the composite score on the PSAT 8/9 and the PSAT 10. Quest's composite scores for the PSAT 8/9 for the 2021-2022 school year was 742, increasing to 771 in 2022-2023 and representing an increase of over 3.75 percent. Quest's average composite score for the PSAT 10 was 736 in 2021-2022 and it increased to 783 in 2022-2023, representing an increase of over six percent.

PPS data on the subject is nonsensical. It provides that Quest made a six percent increase in 2021-2022 and a ten percent increase in 2022-2023 on the PSAT 8/9 and a zero percent increase in 2021-2022 and a two percent increase in 2022-2023 on the PSAT 10. This cannot be accurate because no PSAT was administered in the Spring of 2021 so there is no basis for a percentage increase in the 2021-2022 school year. This alleged noncompliance concerning PSAT growth was not addressed in the PPS Preliminary Performance Report, ²² denying Quest from making any meaningful response to PPS's assertion of noncompliance in its renewal application or public hearing. Finally, the allegations were first provided for in the Review and Recommendation document, which does not provide the composite scores from which the percentage increases are purportedly based, further denying Quest an opportunity to meaningfully respond to its claims of noncompliance. Based on the actual data available, Quest clearly met the growth goal for both the PSAT 8/9 and the PSAT 10.

iii. ISA

The Charter Agreement sets forth a goal of a 2.5 percent annual increase of students' proficiency on the Illinois Science Assessment ("ISA"). Although the Preliminary Performance Report did not raise this issue of Quest's compliance with the Illinois Science Assessment performance goal, Quest's performance was included in the final review and memorandum to PPS's Board of Education as a goal Quest allegedly failed to meet. In the 2020-2021 school year, 7.4 percent of Quest's students had proficient or exemplary scores on the ISA. In 2021-2022, that score rose to 28.7 percent of students. In 2022-2023, 21.8 percent of Quest students were proficient or exemplary on the ISA.

PPS characterizes this as a failure to meet the performance goals of the contract, overlooking that in one year, the percentage of proficient or exemplary students on that exam grew by approximately 288 percent. Of course, that kind of growth is not reasonably sustainable; thus, it is unsurprising that growth was tempered in the following year. Nonetheless, Quest still increased its percentage of students proficient on the ISA by nearly 200 percent from the 2020-2021 school year to the 2022-2023 school year, an average annual increase of well over the contractual goal of 2.5 percent. Notably, this trend follows PPS schools' trend which experienced a nearly 30 percent increase in 2021-2022, followed by a decrease of nearly 13 percent the

²² PPS Preliminary Performance Report

following year. Although Quest did not meet the annual growth rate from 2021-2022 to 2022-2023, it has made reasonable progress and substantial growth from the beginning of the charter term.

iv. SAT

The Charter Agreement sets forth a goal of a 2.5 percent annual increase in the composite score for the school day administration, which is the administration in the spring semester of students' junior year. Unfortunately, there is no metric for growth, similar to the SGP, reported for high school students. Instead, we are left with the raw SAT scores and can only measure student performance by proficiency, a metric that has predictable bias based on student demographics. Unfortunately, despite their hard work, Quest students did not achieve that goal.

Although the SAT provides achievement data for high schoolers, its importance as an indicator of academic success is declining. Thus, our students know that colleges and universities are relying less on the SAT for admission purposes and, also relevant, the State Board has recognized that a student's demographics can be predictive of achievement on such proficiency-based tests. This suggests that reliance on one administration of the SAT as the primary performance indicator for a high school is ill-considered.

The composite score for 2020-2021 was 825, followed by a composite score of 809 in 2021-2022, and 765 for the school day administration in 2022-2023. This decline in SAT performance was not isolated to Quest. PPS's average composite score for 2021-2022 and 2022-2023 declined by over 50 points compared with the average composite score of 2020-2021. Similarly, the State average composite score declined to 960 from 982 in 2021-2022. The two high schools from which 90 percent of Quest students would otherwise attend each had lower average composite SAT scores for the term of the charter with the exception of Peoria High School in 2022-2023.

Quest has seen the impacts of the pandemic affect high school students most aggressively, and this trend appears to be felt across the city and the state. Although Quest did not meet the 2.5 percent targets on the school day administration, Quest did not quit. Quest students retake the SAT as seniors in the fall and almost always achieve higher results. The class that took the SAT last spring has achieved an average composite score of 801 for the fall administration, an increase of nearly 5 percent over the spring administration.

The pandemic had wide-ranging impacts on students resulting in diminished scores as a cohort, but many Quest students demonstrated personal growth after their first test which demonstrates the efficacy of Quest's interventions, despite the pandemic's deleterious impact on academic achievement. This increase is encouraging and demonstrates that Quest students are continuing to strive for high achievement and are committed to academic growth as they continue to reintegrate into their education in a post-pandemic world.

v. Attendance Rate

The Charter Agreement provides that Quest should strive to achieve a 94 percent attendance rate. Quest unfortunately did not meet this goal, but neither did the vast majority of PPS middle and high schools. In fact, only one school, Reservoir Gifted, achieved such a high attendance rate throughout the subject years. Richwoods High School also achieved a 94.4 percent attendance rate in the 2020-2021 school year but dropped below that threshold in the subsequent years. Even the state average attendance rate for the term years fell below 94 percent.

Although Quest did not achieve the 94 percent set forth in the performance goals, in FY2023, its attendance rate has increased by 2.5 percentage points, from 82.7 percent to 85.2 percent, and the rate of chronic truancy has decreased by almost 7 percentage points, from 71 percent to 64.2 percent.

Quest is committed to ensuring that its students regularly attend school, but it is clear that after the Covid-19 pandemic, a 94 percent attendance rate became unrealistically aspirational. For much of the term, instruction was delivered remotely. Low attendance rates during this time can be attributed to technical issues with remote learning, difficulties with attending school at home, student and family health and illness, and other barriers to regular attendance. Additionally, during the 2021-2022 school year, Quest maintained a regular day schedule, five days per week where PPS had A/B day classes with a reduced daily schedule. Quest takes pride in the high standard it held its students to during the return to in-person learning, but it did come with costs and understandably high absences – especially because of Quest's duty to protect its students and faculty through Covid-19 health protocols. Inherently, attendance decreased as students who were exposed or who had a risk of exposure were not permitted to attend school. For this reason, Quest's attendance rate for the 2021-2022 school year was substantially similar to that of 2020-2021, 82.7 proceeded by 82.9, respectively.

As Quest continues to "return to normal" after the pandemic, it has seen continued improvement in attendance rates. For the Fall semester of 2023, Quest had an 88 percent attendance rate, an increase of nearly 3 percentage points from last year. Although the hope is to achieve and surpass the pre-pandemic attendance rates of 92 percent, Quest's growth so far demonstrates the effectiveness of its continued efforts to overcome the barriers that have prevented regular school attendance for the last several years. Quest is gaining on average 2.5 percentage point increases annually and has established reasonable progress towards this goal.

vi. Ninth Grade on Track

The Charter Agreement requires that Quest meet or exceed the state benchmark for Ninth Grade on Track. The growth of the percentage of Quest's Ninth Grade on Track continues to demonstrate its commitment to overcoming the hardships, learning loss, and difficulties resulting from the Covid-19 pandemic. In FY2021, a year that was predominately delivered by remote instruction, Quest's percentage of Ninth Grade on Track fell from 84.4 percent to 69.4 percent,

while the state average remained at 82.2 percent. Over the next two years, however, Quest's percentage of Ninth Grade on Track rose to 81.6 percent in 2021-2022, and 87.1 percent in 2022-2023. In other words, Quest students exceeded their pre-pandemic performance and now are within 0.3 percent of the state-wide percentage of 87.4 percent. Although admittedly still below the state average, the difference is nominal and should be considered as a performance goal met, or at least one for which reasonable progress and substantial growth was made.

This further illustrates PPS's unreasonable denial of substantial growth. A gain of over 17 percentage points of Ninth Grade on Track within two years should be commended, but, PPS's strict compliance approach, notwithstanding its contractual and statutory obligation to at least consider reasonable progress and growth, disregards the gains made by Quest faculty and students and simply concludes noncompliance based on 0.3 of a percentage point in an isolated year. Quest takes the position, however, that a gain of nearly 18 percentage points over the term of the charter demonstrates reasonable progress and substantial growth.

vii. Graduation Rates

The Charter Agreement calls for a four-year graduation rate that meets or exceeds the state average benchmark. Quest's graduation rates reported on the 2022-2023 School Report Card exceed its pre-pandemic levels and they are approaching and substantially equal to state-wide graduation rates, giving Quest the distinction of having one of the highest graduation rates among PPS high schools. Although Quest did not attain the state benchmark for graduation as set out in the Charter Agreement, it has made significant progress towards the benchmark, and in the process, has surpassed PPS average graduation rates. For 2022-2023, Quest's graduation rate was 86.5 percent and the State's average was 87.6 percent, compared to PPS's average of 81.2 percent. Although the graduation rates for 2020-2021 and 2021-2022 fell to 3.2 (83.6 / 86.8) and 5.8 (81.5 / 87.3) percentage points below the state average respectively, this difference was the direct result of challenges posed by the Covid-19 pandemic. Even during this time, Quest maintained higher graduation rates than the PPS averages (77 in FY2021; 80.2 in FY2022).

Quest is committed to high academic achievement, which results in high graduation rates, and prepares its students for success in college. This commitment is reflected in the 2022-2023 graduation rate report and Quest anticipates even higher graduation rates in the coming years as its growing number of Ninth Grade on Track continue to matriculate. Quest's growth toward nearly achieving state average rates of graduation demonstrates that reasonable progress has been made toward this goal.

c. Student Discipline

Quest takes any concern regarding suspensions, referrals, and the resulting administrative actions very seriously. Quest is committed to maintaining a safe and supportive learning environment for all students. PPS's Preliminary Performance Report²³ and its Review and

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²³ PPS Preliminary Performance Report, p. 3

Recommendation²⁴ assert that Quest's student discipline rates are "very high" and "potentially indicative of little to no student interventions". We acknowledge that the reported suspension rates for the subject years were higher than Quest would like them to be; however, Quest's approach to addressing these disciplinary issues has clearly been effective, given that the number of out-of-school suspensions has dramatically declined from 286 in 2021-2022 to 196 in 2022-2023. In the fall semester of 2023, Quest's out-of-school suspension rate was 102. Quest has also addressed the reporting issue which appeared to result in such a high percentage of referrals with "no action," as is evidenced by the decline from 72.2 percent of referrals incorrectly reported as "no action" in 2021-2022 to just 6.2 percent of "no action referrals" in FY2023. In those prior cases, school administration did make targeted behavior interventions, but documented the interventions internally instead of using the Skyward system that PPS preferred; thus, as Quest explained inperson to PPS staff during its regular quarterly meetings and in its response PPS's preliminary performance report – PPS's concern in that regard was understandable but unfounded.

Unfortunately, there was a substantial increase in reported discipline incidents between 2020-2021 and 2021-2022 as a result of the return of full-time in-person learning in 2021-2022 after the pandemic's closure. Quest was no exception to most students' increased need for behavioral intervention and social-emotional support after returning from the Covid-19 shutdown. Upon return to in-person learning, Quest experienced staggering increases in students' emotional dysregulation, anger, conflict, and defiance. Grappling with the challenges imposed by the pandemic, and after such long social isolation, large numbers of students were adjusting slowly and with difficulty to returning to the in-person environment. In the meantime, Quest was challenged by a significantly increased number of physical and disruptive altercations, and a shockingly acute, defiant attitude by many within the student body. Further, students had demonstrated an increased inclination to violate rules (and laws) with respect to illegal drug use or vaping/smoking on school grounds. Quest took extraordinary measures to address these issues, through multi-tiered support systems. There was a school-wide initiative introduced to support citizenship, self-confidence, self-respect, and respect for others. Additionally, staff worked to use targeted interventions with students in anticipation of problematic behaviors.

Quest also remained consistent and comprehensive in its approach to student discipline, maintaining the Quest School-wide Discipline Procedures and Expectations attached as Appendix B to the 2020-2022 Charter Agreement with which PPS agreed. That procedure provides fair and consistent consequences. Quest conducted a thorough review of its referral data for 2020-2021 and 2021-2022 and discovered that an administrative reporting practice of recording interventions internally had led to an inaccurate representation of the discipline data conveyed to PPS as being without "action." Quest has reviewed this procedure and instituted new support for that position, appreciating that behavior interventions are substantially more frequent following the return to in-

²⁴ PPS Ex. 10 – Review and Recommendations, p. 29

²⁵ 2020-2022 Charter Agreement, p. 31-37.

person learning. Quest has obviously remedied this issue because its "no action referrals" in the 2022-2023 school year has been reduced substantially.

In response to the note that "7 teachers each had over 100 referrals, the highest was 184," it is important to recognize that (a) given Quest's high standards, a referral was often written for even a minor policy violation and (b) Quest refuses to direct its staff to "limit" office referrals to artificially alter or reduce disciplinary incidents. Some teachers feel confident conducting behavior interventions on their own and require very little involvement from the administrative office for minor violations. Other faculty, both certified and noncertified staff, believed that each violation of school policy should be documented and reviewed by administrative staff. Quest believes that these two approaches to student discipline are each perfectly valid and works to both empower and support their teachers with regard to student discipline. Contrary to the unsubstantiated accusation by PPS, this data does not suggest that there are no student interventions, only that teachers require different levels of administrative involvement for student discipline and Quest's approach demonstrates that it does not leave a teacher unsupported.

Quest teachers and staff understand the importance of proactive student intervention and have reviewed and implemented the intervention and discipline strategies. This is reflected in the 53 percent decline in referrals and the 32 percent decline in out-of-school suspensions from 2021-2022 to 2022-2023. It is clear that Quest is committed to improving its support mechanisms to address the behavioral and academic needs of its students effectively as its experience and the data demonstrate.

d. STEAM Focus

PPS alleges that "[t]he data shared with PPS in June 2023 regarding three-year trend data (2020-21, 2021-22, 2022-23) does not align with their claim to be a robust STEAM school as course enrollment data shows: For six courses provided, five out of six had decreasing enrollment with two courses at zero enrollment (Civil Engineering, Anatomy) for 2022-23 SY."²⁶ This allegation mischaracterizes Quest's commitment to STEAM education. As PPS's own data shows, student enrollment and attendance has declined across classes following the pandemic, not just in STEAM-focused classes. Further, PPS's conclusory assertion ignores other active and involved STEAM opportunities offered by Quest.

Quest differs from traditional public schools in several ways, including the provision of a rigorous, college-prep, STEAM-focused curriculum available to all 5th-12th grade students residing within District boundaries. As a charter school, Quest has greater flexibility in its delivery model than a public school does, allowing teachers to try innovative educational strategies and programs and project-based learning, focused on personalized learning. In this way, Quest has worked to fulfill its founding inspiration of preparing students to meet the challenges of post-secondary education and be competitive in the workplace, locally, nationally, and globally.

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²⁶ PPS Ex. 11 – Administrative Memo, p. 4

Through these flexible delivery models, Quest offers its students a rich STEAM experience that goes beyond simply enrolling in classes, although Quest requires more math and science classes to graduate than the Illinois statutory minimum and the number required by PPS. Quest works to expose students to career opportunities in STEAM fields from their first day. This is highlighted by the "Path to College" and STEAM Focus²⁸ sections in Quest's Renewal Application. From fifth grade, Quest students begin with an online platform, Xello, that guides students to STEAM career success including student certifications and mini diplomas. Quest is in the final stages of implementing an augmented classroom and lab area that will immerse students in STEAM learning such as design processes and virtual reality. One of Quest's most successful initiatives is its involvement in Project Lead the Way which is a problem-based, technology-integrated engineering and biomedical science program integrated into the high school curriculum. Additionally, Quest students regularly attend STEAM focused field trips and experience real world application of STEAM learning. Quest also has opportunities for extracurricular STEAM experience, including a popular robotics team, Lego league, and performing arts.

Furthering its students' STEAM opportunities and focus, Quest has developed and maintained relationships with many community partners, including Caterpillar, health care providers and colleges of medicine and nursing, Advanced Technology Services, to provide its students with internships, externships, and career preparation opportunities.

Although some similar programs may be available at other PPS schools, Quest makes these initiatives a priority. In addition to its STEAM focus, Quest has prioritized preparing its students for success in post-secondary education and career readiness. This is reflected by the impressive college acceptance statistics reported in Quest's Renewal Application.²⁹ Since its first graduating class in 2016, every graduating senior has been accepted to either a 4-year university, community college, or has enlisted in the military. Additionally, Quest's percentage of post-secondary enrollment significantly surpasses PPS and state averages. For example, in 2020-2021, ISBE reports that Quest's post-secondary enrollment was 74 percent of students, compared to PPS's 47 percent and the state average of 65 percent. Instead of merely making these options available to students, Quest works directly with each of its students to ensure these results, and this priority has enabled many Quest students to pursue post-secondary education, many for whom college would otherwise not have been a viable option.

e. Teacher Retention

PPS made note of Quest's teacher retention rate for the first time at the Board's vote on January 22, 2024. Although there is no teacher retention requirement under the contract and this was not established as a concern throughout the term of the charter, including in the Preliminary Performance Report, PPS drew a parallel to Quest's teacher retention rates and its teacher

²⁷ Quest Renewal Application, p. 85-87.

²⁸ Quest Renewal Application, p. 10-15

²⁹ Quest Renewal Application, p. 6.

certification rates, suggesting that one is responsible for the other. PPS seemed to make the insinuation that Quest is a difficult school environment to work in. That implication is baseless.

Quest's teacher retention rate can be contextualized in a few ways without making false presumptions about Quest's culture and climate. Principally, Quest's average 2023 salary for teachers was \$49,600, compared to a PPS average salary of \$69,400 and a state average of \$73,900. Because Quest does not have the means to compensate its teachers like other area schools, it often loses teachers to other schools. This is especially true in circumstances where Quest facilitates teacher licensure, only to be left after the teacher receives his or her certification. Additionally, the nature of charter schools' frequent reauthorization requirements and Quest's tenuous relationship with PPS has led to significant uncertainty for teachers. A reduced sense of job security because of the threat of non-renewal or revocation has led some teachers to seek out other positions. Finally, Quest's urban geographic placement and its underserved students take a toll on educators – a phenomenon seen among many inner-city schools.

Because January 22, 2024, was the first time that PPS had raised teacher retention as a concern, however, Quest was unable to respond in time to PPS's implication that Quest is a toxic environment in which teachers are unsupported. Had Quest been able to convey and give context to the unique challenges that are faced by Quest's teachers in its Response to the Preliminary Performance Report or at its public hearing, Quest could have shared evidence of its positive culture and climate for its teachers and demonstrated that Quest is a great place to teach, in spite of its challenges.

f. Enrollment

Although Quest has seen a decline in enrollment since the pandemic, there are promising indicators that recovery is just over the horizon. In the fall of 2023, Quest had the largest fifth grade enrollment in at least five years. That was the second subsequent year of growth for the fifth grade incoming class. Similarly, Quest's eighth grade class from 2022-2023 grew by 24 percent for ninth grade enrollment in the fall of 2024. These indicators show that, although overall enrollment has declined to some extent in the last several years, which can be largely attributed to impacts of the pandemic and the temporary decreased visibility of Quest and its students' success during that period, district-wide, students are excited to see what Quest has to offer and experience a unique STEAM-based education setting.

Since its inception, Quest has focused on college readiness. It achieves this via fidelity in enforcing its high expectations with academic rigor. Quest is proud of the achievements that its alumni have made in their academic careers. Quest's rigorous graduation requirements ensure that Quest students are prepared for success in college. This can also, unfortunately, have the unintended consequence of discouraging some students from continuing at Quest who are not accustomed to such high expectations.

Quest also focuses on choice – both parent choice and student choice. Each student learns differently and an educational environment that gives one student an opportunity to thrive may not be a great fit for another. Students and their families are free to make the choice to continue at Quest each year and may transition after the year if, as is true for some students, the academic rigor, high expectations, and more stringent graduation requirements are less appealing than their home school. Other students prefer the increased extra activities that the larger schools can provide such as a full suite of athletics, drivers education, and vocational education. Quest's goal is to provide such experiences at Quest but has struggled to obtain PPS's cooperation in coordinating those opportunities over the last several years.

Although the Charter Agreement provides for a maximum of 600 students, there is no particular enrollment or retainment rate required under the terms of the Charter. While Quest would like to be the educational home of as many students as possible who desire a high quality, STEAM based educational experience, some declining enrollment does not necessarily indicate "a larger problem or perhaps a general unhappiness," but is likely the result of the rigorous standards required of Quest students, the draw of larger secondary school offerings, and a reduced visibility of the many benefits Quest offers its students throughout the pandemic.

V. Conclusion

Quest has provided Peoria families with an open-enrollment, tuition-free alternative to PPS for 14 years. It offers a rigorous, STEAM-focused, college prep curriculum that engages students in the areas of science, technology, engineering, arts, and mathematics and provides a pathway to post-secondary education and career skills that are often unavailable to the students it serves. It provides students with a diverse staff that more closely represents the students it serves. It also provides students with a staff that is diverse in background, including many instructors with professional experience in the fields they teach to offer real world application and context. Quest offers professionals an opportunity to follow their passion for teaching and provides creative support for them to obtain professional educator licensure. Quest offers community partners an opportunity to engage a dedicated future workforce.

Four years ago, the Quest team knew that the academic goals that were proposed by PPS were unreasonable and insisted that PPS recognize student growth toward those goals in an evaluation of Quest's performance. PPS often characterizes the academic performance goals as <u>mutually</u> agreed to, but they too, mutually agreed to recognize growth in any areas not fully met by Quest. These unrealistically aspirational goals, coupled with the failure to recognize growth towards those goals and a review process that introduced new allegations on the evening of the Board's vote is a reflection of a local school board and administration that does not want to authorize a charter school.

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³⁰ PPS Ex. 12 - Presentation

The Illinois General Assembly has given the State Board of Education authority, however, to reverse a decision in exactly this circumstance — a decision not to renew a charter by a hostile school board or administration, regardless of the school's performance. If the State Board finds that Quest is in compliance with the Charter Schools law and it is in the best interests of the students that it is designed to serve, the Board should reverse the school board's decision to not renew the charter. In the foregoing, Quest has established both of these elements: compliance with the Charter Schools law and that it is in the best interest of the students it is designed to serve to stay open. Quest remains committed to providing students in Peoria with another option for their education — a choice to commit to growth, achievement, and success.

Respectfully Submitted,

QUEST CHARTER ACADEMY

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