



Est. 2005

# Charter Renewal Application

July, 2019 – June, 2024 Charter Term Submitted to Fulton County Schools on September 21, 2018

#### **EXECUTIVE SUMMARY**

| Name of Charter School: Amanaademy   |
|--|
| Proposed Charter Term Length: <u>5 years</u>   |
| Current Grade Range:K-8 Grade range at end of the charter term:K-8   |
| Expected Enrollment at the end of the charter term:  |
| This application was approved by:Local Board of Education on,2018  |
| For each year of the NEW charter term, indicate the number of students the charter school plans to serve:_ |

|        | K  | 1  | 2  | 3  | 4  | 5  | 6  | 7  | 8   | Total |
|--------|----|----|----|----|----|----|----|----|-----|-------|
| Year 1 | 80 | 78 | 76 | 68 | 88 | 80 | 94 | 92 | 64  | 720   |
| Year 2 | 80 | 78 | 80 | 76 | 78 | 78 | 92 | 86 | 88  | 736   |
| Year 3 | 80 | 78 | 80 | 82 | 90 | 68 | 90 | 84 | 82  | 734   |
| Year 4 | 80 | 78 | 80 | 82 | 94 | 80 | 80 | 82 | 80  | 736   |
| Year 5 | 80 | 78 | 80 | 82 | 94 | 84 | 92 | 84 | 782 | 752   |

<sup>1.</sup> State the charter school's mission and describe why this initiative is important to the community it serves. Also provide a brief description of any defining features of the school. Include how stakeholders were involved in the petition process and how they will continue participating. (350 words or less)

"Where Students Come First" – Fulton County Schools' tagline has served as the start to Amana Academy's charter since its establishment in 2005. Petitioning for our fourth charter term, Amana Academy seeks to build on its successful track record in student achievement and organizational standing. Our school's namesake and guiding principle is an Arabic term meaning fulfilling a trust, responsibility, and an ethic of stewardship. Our vision is when parents, teachers, administrators and partners collaboratively offer an educational experience that develops 21st century changemakers—citizen scholars who possess a healthy balance of intellect and ethical character, students with a positive self-image who are motivated for lifelong learning and achievement, who respect others and the environment and who can skillfully express their interests and passions. Amana Academy's mission is to

prepare students for high academic achievement beyond what they think possible, so that they become active contributors to building a better world.

Our school will continue in our K-8 format, which by middle school has yielded academic results among the highest performing Fulton County schools and demonstrates student readiness to matriculate to the next school level.

Amana's approach has attracted a multicultural and economically diverse (half qualify for the federal free and reduced lunch program) student body representative of Fulton County's growing diversity. Since its establishment, the school has engaged parents at all levels of involvement and decision making. With this latest charter petition renewal, the school has enlisted the help of parents serving on the governance board, working at the school as staff members, and others from our parent organization to update the charter petition. This core group's work has been informed by years of experience and feedback from multiple parent surveys conducted since the school's establishment, the SACS CASI accreditation process, and feedback from community organizations. The parents who contributed to this renewal reflected the breadth of skill-sets and experience of the school's parent community. They included educators, business people, corporate leaders, financial experts, and non-profit leaders.

2. Describe the charter school's academic program, specifically focusing on why it is innovative in your school district(s). Include mention of any waivers of state law and SBOE rule that are needed to implement the academic program. Be sure to describe any special characteristics of your charter school, such as a special population or some other feature or features which enhance educational opportunities. (350 words or less)

Our award-winning school utilizes the acclaimed Harvard-based EL Education model (formerly Expeditionary Learning) as our framework for teaching and learning, and during our previous charter term we became Georgia first K-8 Certified STEM School by the Department of Education—we call the combination "Expeditionary STEM". Amana Academy is the only school in the Fulton County School system to implement the EL Education model, and at the time of this petition we are the only STEM-certified school at the middle grades band. At Amana, student success is measured across three dimensions: mastery of knowledge and skills, character, and high quality student work. This multi-dimensional approach empowers all students to do more than they think they can, and leads them to become 21st century changemakers—citizen scholars who are lifelong learners that seek solutions to real-world problems with a strong sense of social & environmental responsibility and cultural competency.

Building on the EL Education framework, Amana Academy organizers have included research-based programs and structures that position students for greater success. To foster cultural competency, we are also unique in offering Arabic world language connections classes at the elementary and middle school levels using the Georgia Elementary School Foreign Languages (ESFL) Model with the additional option of French in middle school (Arabic and French are two of the six official UN languages with Arabic being endorsed by the National Security Education program). Another structure that Amana features is single-gender but equal classroom instruction in middle grades when conditions permit. Gender friendly classroom instruction has had a positive effect on academic achievement and classroom behavior during previous charter terms. Based on analysis of student achievement data and our experience with implementation of single-gender classroom instruction, we continue to see upside potential in

performance for our focus on Expeditionary STEM, as single-gender instruction facilitates learning for underrepresented populations without social distractions allowing students to take risks regardless of subject-specific role stereotypes or negative peer pressure.

Given our academic track record and with half of our students qualifying for the free & reduced lunch program, Amana Academy's unique program is clearly producing better outcomes for diverse and underserved populations from across Fulton County.

The following waivers of state law and SBOE rules are needed to implement Amana Academy's academic program.

Action: Amana Academy wishes to allow flexibility in class size in order to achieve its unique goals. Although Amana intends to keep classes within County/State guidelines, there will be instances where instructional formats such as, but not limited to, learning expeditions and service learning where larger class sizes may be more appropriate; or remediation where a smaller class size would make more sense and thereby improve student performance.

Specific Waiver: Class Size – O.C.G.A. Section 20-2-182(i) and SBE Rule 160-5-1-.08 Appendix A

**Expected Outcome**: Student achievement in specific areas such as project work, field-work for learning expeditions (EL Education), Arabic language, and remediation will be improved through the granting of this Waiver.

Action: Amana Academy's intent is to hire and retain the most highly qualified teachers to achieve the charter's mission. Such flexibility in the hiring of its teachers will improve student performance/achievement in specific areas such as Arabic, project-based learning expeditions (EL Education) that integrate multiple curricular content areas (literacy, social studies, science, mathematics,

etc.), and service learning through the granting of this waiver. Highly qualified teachers in these areas may or may not have been certified. For this reason, Amana requests flexibility in the hiring of non-certified teachers.

**Specific Waiver**: Certification Requirement of Hired Professionals - O.C.G.A. Section 20-2-200, Professional Standards Commission Rule 505-2-.09 1(a) and Fulton County Schools Policy GBBD for Professional Certification

**Expected Outcome**: Improved student performance/achievement in specific areas such as Arabic, project-based learning expeditions (EL Education) that integrate multiple curricular content areas (literacy, social studies, STEM, etc.), and service learning through the granting of this waiver.

Action: All teachers will be required to pursue continuing education courses in order to obtain or retain their certification status in addition to other continuing education training to help achieve Amana Academy's high academic and ethical character achievement goals. However, Amana Academy wishes to waive the State's requirement that this training be provided by local areas of administration and "other appropriate organizations". Amana Academy requests the flexibility to hire skilled professional development consultants to provide services on-site that will provide the teachers and other hired professionals guidance and improvement on their teaching skills. These consultants may not possess the certification requirements of the State, but will possess knowledge and skills needed in order to further the staff's skills in educating the students and providing them with the best education possible in alignment with Amana's unique curriculum and vision and thereby improve student performance. Amana Academy will want the opportunity to participate in courses relevant to its EL Education instructional approach as described in the petition, the Arabic curriculum, and any other courses which facilitate Amana's high academic and ethical standards. Through the granting of this waiver student performance/achievement

will be improved in specific areas such as Arabic, EL Education project-based learning expeditions that integrate multiple curricular content areas (literacy, social studies, science, mathematics), and service learning.

**Specific Waiver**: Appropriate Organizations to provide In-Service or Continuing Education – O.C.G.A. 20-2-201(c)

**Expected Outcome**: Through the granting of this waiver student performance/achievement will be improved in specific areas such as Arabic, EL Education project-based learning expeditions that integrate multiple curricular content areas (literacy, social studies, science, mathematics), and service learning through.

Action: Amana Academy wishes to have flexibility to create a schedule which best accommodates the needs of the students and teachers. While Amana Academy intends for teachers to have a duty-free time during the day, it may be necessary for some teachers to be available to assist the students during the lunch hour. This option will afford Amana the flexibility to (a) promote a "we are crew" culture per ELEducation design principles, and (b) manage expenses associated with substitute teachers and paraprofessionals/instructional assistants.

**Specific Waiver**: Duty Free Lunch Period – O.C.G.A. Section 20-2-218

**Expected Outcome**: The granting of this waiver will provide this extra "teacher" time with their students that allows for a closer relationship with students and will lead to improved student performance/achievement in all subject areas and in classroom behavior.

**Action**: Given its unique educational program elements, such as but not limited to EL Education or Arabic language, Amana Academy wishes to have flexibility in the selection of textbooks and the

electronic copy requirement to improve student performance/achievement. A textbook selection committee intends to choose the best textbooks and curricular resources, which improve Amana's ability to implement its curriculum.

**Specific Waiver**: State Board to prescribe textbooks: O.G.C.A. 20-2-1010 and Electronic Format of Textbooks: O.C.G.A. Section 20-2-1015 and SBE Rule 160-4-4-.10(k).

**Expected Outcome**: The granting of this waiver will improve student achievement in specific areas such as Arabic language and project based learning expeditions, which will benefit from textbooks that align well with EL Education's instructional approach.

Action: Because of its smaller size, Amana Academy's intends to serve the needs of Intellectually Gifted children to the greatest extent possible within the context of the regular classroom where teaching staff may not be State certified. The flexibility to meet the needs of Intellectually Gifted students using non-State certified personnel will prompt Amana to hire highly qualified teachers who possess the qualifications to fulfill on Amana's program while maintaining a manageable school size. The relatively small size of the school will allow for stronger personal relationships between students, staff, administration, and families, ensuring that no student "falls between the cracks" and will improve overall student performance.

**Specific Waiver**: Category VI Special Needs Eligibility for Intellectually Gifted Students: O.C.G.A. 20-2-152(6), Qualified Personnel Standard for Special Needs Students SBE Rule 160-4-2.38, Fulton County Program for Intellectually Gifted Policy IDDD

**Expected Outcome**: The granting of this waiver will improve student achievement in areas such as project-based learning expeditions that integrate various subjects around a central theme. EL promotes differentiated teaching skills within the classroom versus "tracking". This approach may not require State TAG certified teachers.

**Action**: Any student desiring a unique curriculum with high academic expectations and who lives in the Fulton County School District will be able to attend Amana Academy.

**Specific Waiver**: Limited Public School Choice – SBE Rule 160-5-4-.09

**Expected Outcome**: The granting of this waiver shall improve overall student achievement and behavior, since Fulton County residents will attend this school by choice and will have a vested interest in the educational programs and approaches the school offers. This vested interest will translate into higher levels of parental involvement in students' learning, which has been shown to improve student achievement.

3. Describe the charter school's organizational structure, specifically focusing on its innovation and need for flexibility, its general partnership structure with an educational service provider (ESP) if any, and the school's community interest and need. (350 words or less)

Amana Academy continues its K-8 format in the new charter term with an attendance zone spanning the entire Fulton County Schools district. The school is headed by an Executive Director with direct reports representing four functional areas: academics, finance, operations, and sustainability. The school's autonomy allows it to continue its consulting agreement with EL Education (eleducation.org), a nonprofit leader in educational innovation that partners with 160+ network schools and districts nationwide to provide educational resources for teachers including professional development, curriculum, and best practice sharing. Amana Academy's autonomy and agility was a key factor in its ability to leverage the EL Education model's cross-disciplinary learning approach to integrate STEM education. This comfort level with innovation has allowed us to win awards such as the Technology Association of Georgia's TAG-Ed Collaborative Certified STEM School outreach award for our work in showcasing our expression of STEM

Education with schools from across Georgia and beyond. In many ways, Amana has become a "lab school" that seeks to try and share field-relevant approaches that can produce better outcomes for students. Our location in North Fulton and specifically Alpharetta with it's 600+ technology companies creates synergies and opportunities for collaboration on ways to inspire STEM thinking among students.

# **PAST PERFORMANCE**

- 1. Complete and attach as Exhibit 5 the Accountability Report available on the GaDOE's Charter Schools Division website to show the school's performance during each year of your current charter term and include with your charter renewal application.
- 2. Provide a narrative describing how the charter school performed in meeting the academic and organizational goals set forth in its current charter contract. In your narrative:
  - Address the school's performance in each year of your current charter term.
  - You are urged to include any supporting charts, tables, or graphs that provide quantitative data.
  - If your charter school did not meet all of the goals in its charter contract, explain any mitigating factors to which this can be attributed, and explain how the school plans to address them in the upcoming charter renewal term requested.

#### **ACADEMIC GOALS**

Goal 1: During each year of its five-year charter term, the Charter School shall "beat the odds" as determined by a formula measuring expected student growth.

According to Amana's charter contract, executed on May 8, 2014:

- The Beating the Odds analysis is a cross sectional, fixed effects regression model that uses the following factors from the CCRPI school-level dataset, GaDOE student record file, and GaDOE CPI data.
  - Student based factors:
    - %African American
    - %Hispanic
    - %White
    - %Other
    - %Free/Reduced Lunch
    - %Students with Disabilities
    - %English Language Learners
    - %Gifted

- School based factors:
  - School Size (FTE)
  - Student/Teacher Ratio
  - School Configuration/CCRPI Score Type (i.e. Elementary, Middle, High)
  - Local Type (i.e. City, Town, Rural)
  - District Performance (fixed effect)

Table 2.0 Amana Academy's BTO Factors SY2014-2017

| SY | CCRPI<br>(w/o<br>challenge<br>points) | %Asian | %Black | %Hisp | %Nat | %Multi | %Wt | %ED | %ELL | %SWD | FTE | Cluster |
|----|---------------------------------------|--------|--------|-------|------|--------|-----|-----|------|------|-----|---------|
| 17 | 80.5                                  | 18     | 39     | 11    | 0    | 4      | 28  | 52  | 10   | 8    | 726 | EM      |
| 16 | 76.3                                  | 17     | 38     | 10    | 0.2  | 5      | 29  | 41  | 10   | 7    | 741 | EM      |
| 15 | 76                                    | 20     | 35     | 7     | 0.2  | 5      | 32  | 41  | 8    | 7    | 695 | EM      |
| 14 | 83.2                                  | 21     | 35     | 6     | 0.2  | 4      | 31  | 26  | 8    | 7    | 712 | EM      |

As a school, we are categorized as EM (Elementary and Middle) for the purposes of calculating whether we beat the odds. Although our CCRPI was higher than both the district and the state during all years of our most recent charter term, the average scores across both elementary and middle grade did not meet the BTO measure, driven by influx of students from other schools into elementary grades. During that time period, we saw a shift in demographics across all grades, particularly in our Free/Reduced Lunch population, which grew from 26% FRL in SY2014 to 52% in SY2017, while our FTE stayed relatively static. Despite this dynamic shift from year-to-year and significant increase, we managed to improve our CCRPI score between SY2015 and SY2017. Because our elementary school is larger than our middle school, its CCRPI score is weighted heavier than our Middle School score. Looking at them individually, our Middle School's score is quite a bit higher than our Elementary School:

Table 2.1 - Amana's CCRPI Score vs. the District and the State

| SY | ES   | MS   | Comb | FCS  | GA   |
|----|------|------|------|------|------|
| 17 | 81.9 | 92.2 | 85.3 | 78   | 75   |
| 16 | 75.4 | 90.6 | 80.1 | 74.7 | 73.6 |
| 15 | 74.7 | 92.3 | 80   | 74.7 | 75.5 |
| 14 | 83.7 | 92.2 | 86.2 | 73.4 | 72.3 |

The FRL proportion is the same for both, yet there are a couple of factors at play here, we believe. First and foremost, we believe that the students who are with us the longest, and who are exposed to our EL Education model the most (i.e. our middle school students), are more likely to show increased growth and achievement over time. Too, we see greater churn in our elementary school than we do in the middle school. We often receive an influx of new students in 3rd grade, which is the first tested year for the GA Milestones. These students are new to the EL Education model, and new to our school's culture and environment. And there is often a reason that their parents have chosen to move them at this critical time in their education—perhaps they had a bad experience at their prior school, or they weren't receiving the services that they needed to succeed, or perhaps they recently moved and had to change schools. All of these factors can affect a student's ability to succeed. We believe that, were our middle school and elementary school to be scored separately using the Beating the Odds analysis, our Middle School would meet the BTO measure.

# Goal 2: The Charter School will demonstrate proficiency and/or improvement on the CCRPI.

 Measure 1: The Charter School's CCRPI score shall be equal to or better than both the State and local district in 2014-15, and better than both the State and local district in 2015-16 and all remaining years of their charter contract.

- 2. Measure 2: If the school's baseline CCRPI score (2013-2014) is lower than either or both the local district and the state, the School shall have until the end of the 2014-15 school year to close the gap between the Charter School and whichever score is higher, the local district or the state.
- 3. Measure 3: In 2015-16 and all remaining years of the charter contract, the Charter School's CCRPI score shall be better than both the State and the local district.

As we showed in table 2.1 above, Amana's combined CCRPI score was consistently higher than both the State and the District for all years of our most recent charter term.

| ı   | C 1   | ELAM 1: C 41 D 4:1           | M 41 M 11 C 41 D 411          |
|-----|-------|------------------------------|-------------------------------|
| 1   | Grade | ELA Median Growth Percentile | Math Median Growth Percentile |
| 1   |       |                              |                               |
| - 1 |       |                              |                               |

## **ORGANIZATIONAL GOALS**

Amana had three organizational goals set forth in our current charter. The first goal was for the school to be economically sustainable. Each year, Amana has operated in a fiscally sound manner as measured by an external audit submitted on time to the Department of Education. Our actual and proposed budget for each school year have demonstrated effective allocation of resources. While actual enrollment did grow, it did not keep up with original projections, so we took a conservative approach to working up proposed budgets. The upshot has been that for most of the years in this current term, actual per-pupil budget allocation from the state and Fulton County was higher than assumed for proposed budgets, which has allowed us to invest in teachers and technology. In terms of cash reserves, we have made a concerted effort to better manage the balance sheet and has resulted in 34 days-cash-on-hand for fiscal year ending June 30, 2018. Our plan is to improve that metric to 60 days by the end of the next charter term. Other financial sustainability measures that Amana Academy has met include meeting all Generally Accepted

Governmental Accounting Standards (GAGAS) as demonstrated by our external, annual audit reports.

We have also met all financial reporting deadlines set by the Department of Education.

The second operational goal was to ensure that all Governing Board members received effective training, which they did via the Georgia Charter Schools Association annually.

The third organizational goal was for Amana Academy to promote a positive school experience that engages students, parents and teachers. The first key measure for achieving this goal is absenteeism. In each year of the charter term, the percentage of Amana students absent 15 days or more never exceeded 10% and was in fact below the 5% target. A second key engagement measure includes a satisfaction survey with a target of 90% of parent respondents stating that they are at least "satisfied" with the overall quality of their child's education. Our surveys included internally generated, AdvancED, and Georgia DOE instruments. The AdvancED survey was the most consistent over the years with the latest score of 4.46 (out of 5) during reaccreditation in 2018. The final measure used for the engagement goal is for teachers where our AdvancED survey result was 4.31 (out of 5) during reaccreditation in 2018. Both scores were above national norm benchmarks.

#### 3. Describe the school's current financial situation. In your description:

- Include an explanation of financial results.
- Detail any financial successes or struggles the school experienced during the current charter term. Include any instances of fraudulent behavior or accusations of fraudulent behavior by school staff, governing board members, or anyone else associated with the school.
- Explain how the school will address any struggles discussed above as well as any outstanding debts. Explain how the school will allocate any surplus funds.

At the start of the last charter term, Amana Academy had just purchased our facility through the proceeds from an \$8.5 million tax-exempt bond. The purchase and maintenance of the building (built in 1986) did

put additional strain on our financial standing, as enrollment growth was not as robust as projected. Additional factors that placed pressure on our finances included an increase in Teacher Retirement System (TRS) obligations, which were not offset by increased state/county per-pupil funding allocations. Our average teacher salary also increased during this past charter term, as we tried to stay competitive with district offers for new hires. Amid these struggles, we committed to take a disciplined approach and hired an experienced CFO/Business Manager to better manage our accounting; and in the last four years we have steadily improved our performance. At the ending of the most recent fiscal year (June 30th, 2018), we had increased our cash reserve to 34 days-cash-on-hand, and we maintained a debt service ratio of 1.72 (above 1.0 is good). In order for us to invest in resources for our unique programming (EL Education professional development, STEM, technology, curriculum etc.), we started to participate in the Title-I program and we sought-out more fund-development opportunities through grants, individual donors (mostly parents), and event sponsorships.

At no time during the most recent charter term, nor in the history of Amana Academy, has there been instances of fraudulent behavior or accusations of fraudulent behavior.

Amana Academy looks to further improve our financial standing in the coming charter term by doing the following actions:

- > We will continue to manage our accounting with integrity and discipline.
- > We will continue to advocate for equitable funding of charter schools at the state and local levels.

  Our advocacy will include SPLOST funding, which we have been left out of in Fulton County.
- > We will sell an outparcel on our property and use the proceeds for facility renovations and to increase our cash reserve.
- > We will place any surplus funds into a Board reserve fund to be used for strategic programming initiatives that would not be covered through our annual profit and loss statement.
- 4. Provide a brief overview of the school's current governance structure. In your description, you must include:
  - Specific examples of decisions the governing board has made on behalf of the school;
  - Specific examples of decisions the school leader has made on behalf of the school;
  - How the governing board holds the school leader, any charter partners (ESP/CMO/EMO), and any independent contractors accountable; and
  - The governing board's training program for the current and proposed charter term. Attach as Exhibit 6 a copy of the board's Governance Training Plan.

Amana Academy's governance board is made up of dedicated parents of students at the school and community members. During this last charter term, the structure has evolved to meet the changing needs of the school. For example, as we have "put down roots" in the community after purchasing our building and pursued STEM certification, the Board actively recruited outside community members who had skill sets in finance, facilities technology, process improvement, and media to volunteer their time on the board. The structure has served the school very well and continues to evolve.

Specific examples of decisions the governing board has made on behalf of the school include overall approving the strategic plan, staffing allocation, STEM certification, approval of the annual EL Education work plan, and petitioning Fulton County to amend our charter for expansion into high school grades (which was later rescinded after Fulton announced a STEM-themed choice high school). The governance board holds the executive director accountable through a decision making framework that includes board committees and an annual performance review process. Specific examples of decisions the school leader has made on behalf of the school include hiring personnel, facility renovation projects, and curriculum and operational/vendor partnerships.

- 5. Describe how the school provides state- and federally-mandated services to students with disabilities. Reciting the requirements of law and rule is insufficient. Your description must include the school's practices and procedures to:
  - Evaluate and identify students with disabilities;
  - Develop, review, and revise Individualized Education Programs (IEPs);
  - Integrate special education into the general education program;
  - Ensure that the school facility meets the requirements of other related laws including the Americans with Disabilities Act (ADA) and Section 504;
  - Address student discipline;
  - Handle programming disputes involving parents;
  - Ensure confidentiality of special education records;
  - Purchase services from special education vendors or to contract with your local district to provide a continuum of special education services and how this arrangement will work; and

### • Secure technical assistance and training.

Amana Academy is designed to support and enhance the social and emotional development of all its students, as well as their academic growth. Amana's special need students *uniquely* benefit from the level of differentiation and small group instruction that is delivered in two different formats dependent on student needs: 1) co-teaching within the regular education classroom; or 2) pull out into a one-on-one or small group format.. Our project based/service learning approach creates opportunities that capitalize on student interests and offers enhanced opportunities beyond the classroom walls to enrich our inclusion approach to better serve special needs students.

Through the assistance of our school model partner, Expeditionary Learning, Amana has developed a program that emphasizes the natural world and time to reflect. This provides additional downtime, social communication and movement necessary to recharge students and add focus to learning in the classroom.

Amana has developed applications that will serve the Amana target population in all of these areas.

The small collaborative group emphasis enables special needs students to get attention from the teacher and peers that they would not receive in an environment with longer periods of time devoted to whole group instruction. Additionally, special needs students and their families are assisted by the bonds that develop with the teacher through the practice of looping. Lastly, special needs students find that the emphasis on training for positive, respectful classroom management results in classroom environments that are peaceful, nourishing and welcoming places that allow students to flourish.

Amana Academy complies with all regulatory requirements of the Individuals with Disabilities Education Act (IDEA), Section 50 of the Rehabilitation act of 1973, Title 11 of the Americans with Disabilities Act and shall serve all eligible students as defined in O.C.G.A 20-2-152 (d)(1)(2)(3)(4)(5) regardless of severity and disability.

To ensure its compliance:

Amana works with the District to develop a system that meets the needs of the students and provides students with services from licensed/certified staff or consultants in a manner consistent with state and federal law. Staffing needs are determined by a needs assessment. Recruits undergo a rigorous hiring process to ensure the school is providing certified/qualified instructors for special needs students. Special Needs teachers receive orientation and continued professional development coordinated by the on-site special education coordinator, who is responsible for the individual case management of all Individualized Education Programs (IEPs) and coordinates all related services required by a student's IEP. Amana Academy provides all special education and related services or contracts with a third party service provider to serve students;

Amana maintains a list of the names and positions of school employees who can access student records.

Amana Academy understands that student records are private and all school personnel must obtain parental consent before showing the records to anyone not involved in their student's education. All employees are required to sign confidentiality agreements and each student's folder contains a checkout record showing who reviewed the files and the date of each review; and

**Amana follows** the required procedures, informing parents of their rights and giving them a copy of the procedural safeguards each time there is any correspondence or any meeting is held, in addition to adhering to those specific procedural safeguards as described in IDEA.

Amana Academy follows Fulton County regulations and procedures in regards to the Response To Intervention (RTI) mandated program. Every student begins in Tier 1 of RTI. The procedures are as follows:

- 1. When a student is identified as needing a classroom intervention the teacher shall contact the parent to let them know of the concern.
- 2. Teachers must attempt different strategies with that student for at least a period of six weeks and document all attempts and results. Teachers must make confirmed contact with the student's parents at least twice regarding the concerns within the classroom.
- If a student still does not show progress with classroom interventions, the student is moved to
  Tier 2 of the process where they would receive smaller group strategies and support from the
  instructional coach.
- 4. Student is monitored for six weeks with Tier 2 interventions. If student still shows no progress with small group interventions, they will move to Tier 3. Parent must receive confirmed contact at least two additional times. Tier 3 are individual interventions.

Several steps are used in determining the appropriate educational program to be provided to children with learning, physical and behavioral/emotional difficulties per the following:

- Existing IEPs: an IEP Committee collects and reviews all existing IEP records (enrolling students). The aim is to properly identify and intervene as early as possible and to support and include children with disabilities in the regular education program to the maximum extent appropriate. Amana Academy supports responsible inclusion, and all efforts will be made to serve exceptional students in regular, self-contained classrooms to the maximum extent appropriate in accordance with the Least Restrictive Environment (LRE) guidelines mandated by federal law.
- **Pre-referral:** Consistent with Amana's educational philosophy, the school's faculty will focus on adapting/modifying instructional/management techniques to a child's needs before he/she is

evaluated for specialized services. When classroom teachers notice a student who is displaying difficulties in learning, a variety of different approaches (RTI Tier1 interventions) will be tried and documented to accommodate the needs of the student. After these interventions, a teacher may decide to bring the child to the attention of the Response to Intervention Team.

• Response to Intervention (RTI)/Referral: In compliance with IDEA guidelines, Amana Academy identifies a Response to Intervention Team (RTI) to review an individual student's strengths and areas of concern. This multidisciplinary team, comprised of general teachers, the school counselor, the Instructional Coach and an administrator, plans strategies and organizes resources for redressing problems and concerns about a student.

The Response to Intervention meeting indicates the suspected area(s) of disability, provides school history and documents the modifications that have been tried and proven unsuccessful prior to making a referral. An assessment plan is developed. Student referrals for comprehensive educational evaluation to determine eligibility and the need for special education shall be preceded by interventions at the classroom, small group and individual level.

Assessment/Evaluation: Once a student is referred to special education from the Response to Intervention Team (RTI) or other appropriate source, the evaluation and placement process is completed without undue delay and in accordance with state rules and federal regulations. Prior to conducting an initial evaluation, a school representative contacts the parent/guardian and sets up a conference to discuss the following:

- Review the reasons for assessment.
- Describe the materials and procedures that will be used to obtain information about the child.
- Explain the rights of the parent/guardian and school district related to assessment.

- Determine the student's primary language and proficiency.
- Describe alternate means as appropriate.
- Obtain written consent for release of confidential information.

Parents are strongly encouraged to contribute pertinent information throughout this entire process. Their perspectives and experiences with the student are of great value and will be considered throughout the evaluation process. Licensed staff and/or consultants perform the evaluation(s) and share results with parents and other faculty members. The parent conference may convene without the parent under the following conditions:

- The parent waives his/her responsibility to attend, or
- The parent has neglected to respond to documented communication efforts.

In accordance with state rule 160-4-7-.05, Amana parents receive a copy of their "Procedural Safeguards" in the following circumstances:

- Upon initial referral for evaluation;
- Upon each invitation to an IEP meeting;
- Upon re-evaluation of the student;
- Upon receipt of a request for mediation or for an impartial due process hearing; and
- Upon any proposed change in the eligibility or the educational placement of the student.

At Amana, parents are encouraged to join in the identification and referral process. Parents questioning their child's progress, either developmentally or academically should first request a conference with the teacher. At any time, parents may request an evaluation by submitting a written request for evaluation to the school.

Amana Academy ensures that all evaluation procedures and eligibility determinations are established and implemented in accordance with state rule 160-4-7-.07. This program contains annual goals in each area of need as well as the objectives the students should take to reach each goal. The IEP states what special education and related services Amana Academy will provide, and when and where those services will be provided. The IEP is reviewed and revised at least every year.

The school's application does not identify student characteristics and should not do so to ensure the school does not violate the public trust by selecting only certain types of students during the admission process. However, after admission and upon enrollment, the school is required to accept student permanent records and may, at that time, learn that an admitted student's IEP requirements cannot be implemented at the charter school. While Amana is required to provide the same continuum of services as that of typical schools in Fulton County Schools, the school is not required to provide all levels of services offered in the entire school system. Just as with typical schools, it is anticipated that, in limited cases, student IEP requirements may not be possible at Amana and may dictate placement at another FCS school that offers the required services. The process to be followed in these instances will be the same process used by typical FCS schools and will be in alignment with FCS practices. Such a determination can take place upon enrollment or if the student's learning needs change during their time at Amana.

Individual Education Plan: If the student's assessment/evaluation shows that he/she meets any of the criteria established under the IDEA Categories of Eligibility section (O.C.G.A. § 20-2-150; 20-2-152; 20-2-160; 20-2-161; 20-2-168; 20-2-1160) and is in need of special education services, the student, parent(s) and staff will develop an Individualized Education Program (IEP) to address the areas of deficit in accordance with the required procedures.

At this stage, the student's parents become an equal member of the child's IEP Committee which will also include: the regular teacher, the special education teacher, the school administrator, the assessment professional when assessment is discussed and possibly a representative from Fulton County School System. Other members as required are present such as the LPAC representative when the student is limited English Proficient, the student when appropriate and other related service personnel or individuals that the parent or school deems appropriate to be present.

This program contains annual goals in each area of need as well as the objectives the students should take to reach each goal. The IEP states what special education and related services Amana Academy will provide, and when and where those services will be provided. The IEP is reviewed and revised every year.

For students obtaining an IEP for the first time, the eligibility process must be initiated. This commences once the parent signs the consent for evaluation. The next step includes testing, data collection by teachers and a completed RTI folder. Once these actions are completed, the IEP team meets to evaluate all of the information required for eligibility. This information is then presented to the eligibility committee. If the student is deemed eligible, an IEP Form is completed describing the special services and the parent or guardian signs a Placement Consent for Special Education Form. Once this process has been completed, the IEP becomes effective immediately.

**Review:** Each student's IEP is reviewed at several points throughout the school year and updated at least one time each year.

**Transportation:** The goal of Amana Academy is to provide free door-to-door transportation as a related service when it is specified in a child's Individualized Education Program (IEP). Amana Academy will work in conjunction with Fulton County Transportation Department to provide these services to qualified students.

## Amana Academy hereby provides the following assurances:

- Amana Academy follows the State's middle school concept model by ensuring that the minimum number of minutes is allotted for each subject area, that teachers that teach the same students have common planning periods, that students have Connections classes offered for at least the number of minutes required, and that the curriculum followed is the state mandated standards.
- Amana Academy provides, by contracting Fulton County or by a third party provider, all special education and related services, including free, door-to-door transportation, as required by a student's IEP.
- Amana Academy provides appropriately licensed/certified personnel for all students with disabilities. Students classified as Intellectually Gifted, are not included here and may be taught by teachers who fulfill Amana's teacher hiring criteria (refer to waiver #11 in section 4.2 of this petition).
- Amana Academy implements the same identification, evaluation, placement, reporting, and due
  process procedures and uses the same special education forms as other schools in the System and
  provides copies of all IEP's to the School System.
- Amana Academy provides all resources including all materials and equipment for all students with disabilities.
- Amana Academy submits to program review by state and local officials to the same extent required of other schools in the System.

- School social work services are provided as needed in accordance with Fulton County School System guidelines.
- All Amana Academy teachers are required to participate in workshops, in-service programs
  and/or training offered by the Special Education Department to the same extent required of other
  teachers in the System.
- Students identified with severe disabilities who require more intensive services may be served at the appropriate location according to the IEP in the Fulton County School System.
- Discipline issues regarding special education students are handled in accordance with state rules and federal regulations.
- Amana Academy indemnifies the School System in the event the School System is held liable for
  the charter school's failure to provide eligible disabled students with the special education, related
  services, program accommodations, and due process to which they are entitled under state and
  federal law.
- Amana Academy includes continued services for students who are expelled, as determined by the IEP. IEP goals will be appropriately addressed as per the curriculum and academic options chosen.

6. Describe how the charter school provides state- and federally-mandated services for English Learners (ELs). Reciting the requirements of law and rule is insufficient. Your description must include the diagnostic methods or instruments that are used to identify and assess those students, as well as the instructional program that is provided to ELs.

Qualifying English Learner (EL) Students participate in a program that combines an English immersion model and a pull-out model. Amana has allocated resources for an English to Speakers of Other Languages (ESOL) Specialist who provides small group instruction for beginning EL students through

pull-out sessions, while assisting the regular classroom teachers with instruction for intermediate and advanced students. ESOL Specialists push-in to classrooms when possible to facilitate English immersion and acquisition of language skills. Furthermore, all EL students have the opportunity to interact with their English-speaking peers, who also model English usage, and take part in core subjects in the regular classroom.

Amana Academy, in compliance with Federal, Georgia, and Fulton County laws and regulations, utilizes the current Fulton County instruments when determining eligibility for the ESOL program identification and instruction.

7. Provide the number and percentage of students receiving In-School Suspensions, Out-of-School Suspensions, or Expulsions during the current charter term (e.g., the past 5 years). How does this discipline and dismissal data compare to the Office of Civil Rights data?

|                             | In-School<br>Suspensions |      | Out-of-School<br>Suspensions |                   | Expulsions |     |
|-----------------------------|--------------------------|------|------------------------------|-------------------|------------|-----|
| Ethnicity/Race              |                          | Numb | er & Pei                     | rcentage of Total | Populati   | on  |
| Latino Hispanic             | 15                       | 10%  | 42                           | 13%               | 1          | 50% |
| American Indian             | 0                        | 0%   | 0                            | 0%                | 0          | 0%  |
| Asian /Pacific Islander     | 7                        | 5%   | 20                           | 6%                | 0          | 0%  |
| Black / African<br>American | 94                       | 61%  | 183                          | 57%               | 0          | 0%  |
| White                       | 33                       | 22%  | 57                           | 18%               | 1          | 50% |
| Two or More Races           | 6                        | 4%   | 17                           | 5%                | 0          | 0%  |
| Total Population            | 155                      |      | 319                          |                   | 2          |     |

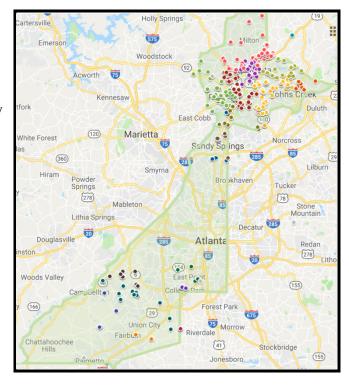
African-American students are over-represented in our discipline data. They are nearly 60% of suspensions and only 45% of the school population. Recently the school has implemented culture and character programming to support all students in making positive choices, implemented the PBIS model for positive behavior supports, and has been utilizing restorative practices as an alternative to suspensions. Based on this change we saw a 75% decrease in suspensions last school year and expect that trend to continue into the next charter term.

8. Describe in detail how the charter school's students, governing board, faculty and staff reflect the sociodemographic diversity of the community served by the charter school. If the charter school does not reflect the community's diversity in one or more areas, provide a comprehensive plan to address this need for diversity.

Table 8.0 - Sociodemographic Diversity SY2016-17

| Community      | Asian | Black | Hisp | Ind/Nat | Multi | White |
|----------------|-------|-------|------|---------|-------|-------|
| Fulton County  | 11%   | 42%   | 15%  | 0       | 3%    | 29%   |
| Amana Students | 17%   | 38%   | 12%  | 0       | 5%    | 28%   |
| Amana Staff    | 12%   | 31%   | 1%   | 0       | 0     | 55%   |
| Amana Board    | 20%   | 20%   | 0    | 0       | 0     | 60%   |

As shown in the table above, Amana's student sociodemographic diversity very closely reflects that of Fulton County as a whole. Because we pull students from the entire length of the county (see map to the right), we definitely want to serve a population that is representative of our attendance zone. As indicated earlier, in table 2.0, our student population has shifted, over the years to more closely reflect the overall population in Fulton County. We believe we are one of the most diverse schools in the county, and that it is one of our biggest strengths.



We recognize that we still have work to do when it comes to how our Faculty/Staff and our Governance Board reflect the diversity of our student body (Latino representation for both, and African American on the Board). Each year, as we look to fill vacancies or to bring on new board members, we take diversity

into consideration and are working to ensure that our staff and board leadership more closely reflect the sociodemographics of our student population.

9. Describe in detail any difficulties faced during the charter term that were not already addressed above, how the school dealt with such difficulties, and if they remain an issue for the school. Also explain how the school plans to avoid these difficulties during the upcoming charter renewal term.

Amana Academy's accomplishments—STEM school certification, enrollment growth, re-accreditation, financial sustainability—during the past charter term are even more impressive when one considers the challenges the school has dealt with. The agility of the school to meet the needs of students was put to the test as demographics dramatically shifted during the 2013-2018 period with the proportion of economically disadvantaged (ED) students rising from 32.72% to 53.51% as families sought out a better option for their children. Amana leaders responded by training staff on bias, securing additional Title-I resources, extending "Power Hour" remediation/enrichment across all nine grades, and implementing more interventions. The demographic changes have stabilized, yet this shift during the previous charter period had a direct impact on our ability to succeed at meeting the beating-the-odds metric (BTO) for our elementary grades, since most new students were enrolled into elementary grades and our programming and resource allocations lagged the dynamic demographic changes. The upshot was our academic performance in the middle school grades, which has students of similar demographics as elementary, but they had benefited from Amana's programming longer. They generated CCRPI scores (92) comparable to elite middle schools in Fulton County with significantly lower ED populations. The changes that school leaders implemented, plus added focus in elementary grades, have started to produce results as elementary CCRPI scores have moved up.

With enrollment growth and the demographic shifts in the "rearview mirror", we are starting this new charter term with laser focus on deeper learning and addressing the needs of our subpopulations.

An additional challenge during the previous charter term was higher than desired teacher attrition, which probably factored into our ability to implement the EL Education model with fidelity across years.

Amana's overall teacher attrition has averaged at 27% during the charter period, which is 2 points higher than the national average for charter schools. Our analysis has revealed causes for attrition that are within our control account for 41.5% of overall attrition, so we are taking steps to better understand our faculty's needs with an eye toward driving this percentage down as close to zero as possible. Key actions include Administrator training, minimizing operational change-ups during the school year, implementing teacher-support structure, and seeking candidates with some teaching experience (ideally 3-7 years) and making them offers earlier in the hiring season. To the extent we can retain quality talent, we exceed the goals set in our charter.

## **PROPOSED CHANGES**

#### A. Academic Changes

- The academic program and curriculum.
- The use of waivers/innovations.
- School programs this includes Students with Disabilities, Gifted and Talented, English Learners, etc.
- Any assessments being used.
- Any administrative positions.

During this new charter term, it is our intent to deepen our engagement with EL Education. In line with our Vision 2020 strategic plan and at the time of this submittal, Amana Academy has successfully achieved the coveted EL Education Credentialed School distinction. With this new status, we will serve as a mentor school within the national EL Education national network and a lab school regionally and locally, especially in the area of STEM Education. In order to obtain this status, we have demonstrated to EL Education that our instructional program not only results in high test scores but also engages all

students in opportunities for deeper learning and critical thinking. Our journey toward deeper learning and critical thinking began in the previous charter term and was grounded in our pursuit to become STEM certified by the Georgia Department of Education. We achieved this goal and have seen how our commitment to high quality STEM education resulted in improved outcomes on state accountability measures such as Georgia Milestones Results, CCRPI and Climate Ratings. In this term we intend to increase the use of structured rubrics from EL Education that support deeper learning through student centered instructional protocols and student engaged assessment.

This shift in instruction is intended to benefit both remedial and advanced learners. The progress of all learners will be monitored through the use of Fulton County Schools' choice for benchmark testing—currently Fastbridge Assessment (in the prior charter term NWEA's MAP test was used for progress monitoring). Fulton County Schools overall has made a shift to FastBridge as the universal screener. Fastbridge is less expensive and provides more extensive testing tools that take less time to administer so that interventions students can receive more frequent progress monitoring.

In addition to more effectively meeting the needs of remedial learners, we are also improving our services for gifted learners. In the elementary grades, our TAG coordinator not only collaborates with each grade level homeroom teachers, but we also have shifted to the resource model. However, unlike the TAG program in some traditional schools where students are pulled from class for an entire day each week, our students receive services during our enrichment/remediation period called Power Hour. This approach allows our students to fully benefit from the general curriculum while simultaneously meeting the unique needs of gifted learners.

#### **B. GOVERNANCE CHANGES:**

- The school's governance structure.
- The school's governing board composition, including its diversity.
- The school's relationship with an Educational Service Provider or other Charter Partner.
- The relationship with the local district.

Our current governance structure reflects an evolution of change as the school has grown and established itself in the local community. It has always reflected the diversity of the school and now includes more outside community leaders who can contribute thought leadership and help the school with oversight, strategic partnerships and fund development opportunities.

Amana Academy's governance structure may need to shift in the coming charter term as the school explores replicating its success in other areas of metro-Atlanta at the request of local communities and becoming a charter management organization (CMO). If Amana becomes a CMO itself, then the current school's governance board may expand with oversight for the entire organization, and it may create a new governance council for each individual school, including Amana Academy and its replicas. While such a change seems significant, our intent is to maintain the sterling relationship we have with Fulton County Schools. To that end, the possible governance council created to oversee the current school (represented in this charter application) will be very similar in scope to governance councils already in place at the traditional schools in the Fulton County Schools charter system.

#### C. FINANCIAL CHANGES:

- The school's financial structure.
- The school's CFO.
- The school's relationship with any major creditors (e.g., landlords, investors etc.)

We anticipate that Amana Academy's financial structure will continue to strengthen as we continue to work to expand our cash reserve and pay down our facilities debt service. We also intend to sell a 1-acre

outparcel of our property and use the proceeds for repairs/upgrades to our facility. Our CFO would remain in place, and if budget allows we will hire additional resources for business manager tasks.

Amana Academy's financial structure may need to shift in the coming charter term as the school explores replicating its success in other areas of metro-Atlanta at the request of local communities and becoming a charter management organization (CMO).

#### D. OPERATIONAL CHANGES:

- The school's facilities this should include any proposed expansion or renovations.
- The school's attendance zone and any enrollment priorities being used (see O.C.G.A. § 20-2-2066(a)(1)).
- Whether the school's students, faculty, and staff reflect the diversity of its attendance zone.
- Whether the school will utilize a weighted lottery to provide an increased chance of admission for educationally disadvantaged students pursuant to O.C.G.A. § 20-2-2066(a)(1) and State Board Rule 160-4-9-.05(2)(g).
- Any services provided to students such as transportation, food service, etc.
- The grades the charter school will serve. Please note this includes adding additional grades or reducing current grades.

Our current facility used to be a shopping center with a large supermarket in the middle and two retail wings to each side. Overall square footage is 105,000 SF with 80% of the space already renovated for school use. All of the elementary classrooms are housed within what used to be the big-box shaped supermarket. Our facilities master plan calls for possibly moving these classrooms into the remaining unrenovated wing (if the financial conditions permit), which would allow for windows and natural light. The big-box would continue to house specials classes and common spaces, such as a makerspace, gym, cafeteria, and media center.

## **LOOKING TO THE FUTURE**

Briefly describe how the school has and will continue with its proposed changes to serve the needs of its students for the upcoming (renewed) charter term.

Amana Academy is poised to prepare students for higher levels of academic outcomes in the new charter term, and to serve as a "lab school" that advances field-relevant instructional and operational structures and approaches. We have successfully propelled through our three previous charter terms to reach this pivotal milestone. The first phase was managing growth from 130 students in our inaugural year to over 700 currently, and the second phase was defined by the purchase and renovation of our building through proceeds from an \$8.5 MM tax-exempt bond deal. And the third and most recent charter term was characterized by ambitious goal-setting in becoming Georgia first K-8 certified STEM school and and EL Education Credentialed School while raising CCRPI scores amid shifting demographics that created more socio-economic diversity in our student body. We now have the opportunity to focus on implementing the EL Education model and Expeditionary STEM with greater fidelity by focusing on a clear definition of student achievement that combines academic achievement, character, and high-quality work.

For the upcoming charter term Amana Academy will continue supporting deeper learning, critical thinking, and higher order literacy skills through integrating our approach to STEM education with our learning expeditions. This interdisciplinary approach coupled with our comprehensive PBIS approach to school culture will further engage students in our learning community. Continued commitment to these best practices will result in improved academic and social emotional outcomes for our students.

We also look forward to partnering with Fulton County Schools and EL Education on advancing innovative approaches to curriculum and instruction, in particular as they relate to project-based instruction and STEM education. Amana Academy's success in becoming a certified-STEM school

prompted our parents to request the Governance Board to extend our program to high school grades, and in the summer of 2016 Amana did submit a charter amendment to Fulton County Schools. Soon thereafter we were encouraged by the district's announcement to launch of a STEM-themed choice high school one mile from Amana to replace an existing alternative school by 2020. Our administration has appreciated being involved in the development of this new high school and looks forward to future collaboration. For their part and given our close proximity and certified-STEM middle school status, Amana parents see the new choice school as a natural progression for many of our graduating 8th grade students, and their hope is that Fulton County Schools grants Amana students admission priority to the new high school.

Additional opportunities for Amana Academy to serve its families and students include extending the EL Education approach to a Pre-K program and a high school auxiliary program for graduates (open to other teens) that continues the mission of creating 21st century changemakers through internship, after-school or summer social entrepreneurship & innovation programming.

Finally, our Certified STEM School and EL Education Credentialed School distinctions provide us with a platform for serving as a lab school that explores innovative approaches and regularly hosting educators and innovators for STEM\\venture Days, workshops, and site seminars that advance deeper learning, Expeditionary STEM Education, culture and character programming, global cultural competency, and sustainability integration. Amana Academy embraces such outreach & collaboration opportunities as foundational to the role charter schools should and can play.

As we move into the next chapter of our journey, Amana Academy will continue to be guided by the stewardship ethic connoted in our namesake. Amana means fulfilling a trust, responsibility, and stewardship; and it is the internalized mindset of our organization's philosophy. It is not only our goal to teach stewardship, but also that it to be actualized in personal habits. Amana Academy's community shall

adopt this principle as the basic value that steers decision-making, fiduciary responsibilities, professional interactions, and other activities related to our operation.

Inherent in the concept of stewardship is a developed sense of responsibility, a sense of being a trustee.

This developed and integrated sense of responsibility translates into service, which is manifested in the following hierarchy of responsibility:

## I. Individual Responsibility

- Seeking knowledge is a responsibility. The pursuit of self-excellence in our education and the proper development of personal abilities and skills enable us to realize our potential.
- Avoiding what harms and seeking what benefits the mind and body in a healthy environment (place/people) benefit our character, education and physical being.

## II. Responsibility Toward Community

- As a school community, our first responsibility is the education of future citizens, by modeling teamwork, lifelong learning and personal integrity.
- As stewards of knowledge, skills and abilities, we each have the responsibility of putting our capabilities to use by serving and positively influencing society.
- Our responsibility as an institution is to create a welcoming atmosphere of openness, efficiency and accountability with all of the stakeholders.
- We serve our community when personal interactions exemplify civil treatment, principled modest conduct, a respectful demeanor and humble attitude.
- By persevering to work together as a united community, we gain a continuous source of renewal
  and positive peer pressure that helps us attain our goals.

# III. Responsibility Toward Humanity and Environment

- Our priority in addressing global human issues, sustainable development and environmental stewardship is to use reality-based scientific, social and cultural study combined with hands-on community experience.
- By understanding our unique purpose in this world and how our simple daily choices affect it, we
   will be in a better position to make contributions to humanity and the environment.
- Excelling as global stewards requires understanding the causes and effects of detrimental forces such as materialism, excessive consumerism, pop culture, sexism, and prejudice and developing the means to counter them.