



**LOS ANGELES UNIFIED SCHOOL DISTRICT  
CHARTER SCHOOLS DIVISION**

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*Director, Charter Schools Division*

July 28, 2017

Via Email and Certified U.S. Mail

Carl Petersen  
108 S. Sonol Drive  
Los Angeles, CA, 90063

**SUBJECT: FOLLOW-UP ON PUBLIC COMMENTS REGARDING GHCHS AT LAUSD  
BOARD OF EDUCATION MEETINGS ON JUNE 13 and JUNE 20, 2017**

Dear Mr. Petersen:

This letter is in response to the concerns you raised during public comment at the June 13, 2017 and June 20, 2017 LAUSD Board of Education meetings about discriminatory enrollment practices and other issues at Granada Hills Charter High School (“GHCHS”).

**Allegations Regarding Discriminatory “Pre-Enrollment” Requirements**

As you know, during public comment, you expressed concern about potentially discriminatory “pre-enrollment” requirements based on information posted on the GHCHS website indicating that, as part of the enrollment process, parents of an enrolling student must provide a copy of the student’s Individualized Education Program (IEP) or Section 504 Plan, if applicable.

The Charter Schools Division (CSD) takes any allegation of discrimination against students very seriously. Based on annual and ongoing oversight of GHCHS admission and enrollment practices and related operations, as well as specific additional review of information and documents posted on the GHCHS website, however, CSD staff has not discovered, received, or otherwise identified any credible evidence of an intent or act to discriminate against students with disabilities, or any other student subgroup, on the part of GHCHS or its staff. While we found that the school’s enrollment webpage does contain the potentially misleading title of “Pre-Enrollment for Incoming Students,” its contents nonetheless indicate that the enrollment procedures and requirements only apply **after** a student has been effectively admitted to the school, either by accepting a seat offered through the school’s lottery or by virtue of the student’s residence within the former attendance boundaries of the school. Like the District’s own enrollment procedures, and consistent with legal and charter obligations, GHCHS requests and obtains at the time of enrollment certain information and documentation to assist the school in providing an appropriate academic placement and program, and access to resources and services, for each enrolling student. Notably, the District specifically requires all LAUSD-authorized charter schools to provide the related services required by a student’s IEP immediately upon enrollment.

We note that this same distinction between admission and enrollment similarly informed the California Department of Education (CDE)’s May 8, 2017, denial of your Uniform Complaint Procedures (UCP) complaint on appeal from GHCHS’s denial decision issued on March 3, 2017. Further, as part of the CDE’s UCP process, GHCHS has agreed to revise its enrollment form and

website to provide further clarification regarding the distinction between admission and enrollment and what is requested after a student has been admitted to GHCHS.

### **Student Demographic Data**

You also shared your concern that comparison of GHCHS's student demographic data with the data of nearby Northridge Academy appears to provide evidence of discrimination and "cherry picking" by GHCHS. Although comparison of GHCHS's current demographic data to the data of other schools in the surrounding community does show differences in the numbers and percentages of students in various subgroups, historical demographics data shows that GHCHS has generally increased its diversity over time. For example, in its current approved charter, the school reported that, since its prior renewal in 2008, it had experienced an 8.5 percent increase (29.9 to 38.4 percent) in its Latino student population, a 4.9 percent increase in its Filipino student subgroup (5.6 to 10.5 percent), and a 5.0 percent drop (32.3 to 27.3 percent) in its White student population. The percentage of students eligible for free and reduced lunch also increased, from 36.0 percent to 53.4 percent, from 2009 to 2013. (GHCHS Charter, p. 149.)

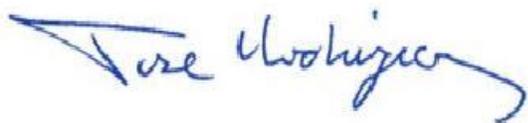
In any case, in the absence of evidence of discriminatory intent or practice, the GHCHS demographics gaps by themselves cannot fairly be considered affirmative evidence of discrimination. As a school of choice, a charter school cannot control who chooses to apply - it remains up to students and their families to determine whether they wish to seek enrollment in GHCHS. As discussed above, the CSD is not aware of any evidence indicating that the school has acted or intended to discriminate against any protected student group.

### **Lack of Elected Parent Representative on the GHCHS Governing Board**

In regard to your concern about the lack of an elected parent representative on the school's governing board, based on review of documentation regarding the governing board's composition, selection of members, and current membership, it appears that the school is in compliance with applicable requirements. The school's current approved charter provides that the parent member of the board is to be selected by governing board appointment. (GHCHS Charter, p. 98.)

Please know that, as part of its annual and ongoing oversight, the Charter Schools Division will continue to review and monitor policies and practices at all LAUSD-authorized charter schools, including GHCHS.

Thank you,

A handwritten signature in blue ink that reads "Jose Rodriguez". The signature is written in a cursive style with a long, sweeping tail.

Jose Rodriguez  
Specialist

c: Jefferson Crain  
José Cole-Gutiérrez  
Robert Perry, Ph.D.  
Sharon Bradley