

**1) Change in Board Composition:**

Any decisions made by a board that is not properly constituted should be invalidated.

According to charter:

**Composition of the Governing Board**  
The Governing Board shall consist of nine (9) voting members:

- three (3) at large/community members
- one (1) parent/guardian
- two (2) certificated teachers (certificated support staff, included)
- one (1) classified staff member
- one (1) administrator (other than the executive director)
- one (1) retired GHCHS teacher

According to minutes:

**GRANADA HILLS CHARTER HIGH SCHOOL**  
Meeting of the Governing Board  
May 22, 2017                      4:00 p.m.                      Library  
Minutes

In Attendance:

Brian Bauer, Executive Director (non-voting)	Amita Naganand, Parent Member
Lorene Dixon, At Large Member	Jim Salin, At Large Member (Chair)
Joan Lewis, At Large Member	Jesus Vaca, At Large Member
Jody Dunlap, At Large Member	

Absent:

Steve Bourgouin, Retired Teacher member

A material revision was not requested from the LAUSD School Board as required.

Granada’s charter did allow a change if there was a modification to the law but the law remained the same. Pacific Palisades and Birmingham both have teachers on their Boards.

The school made the change to its bylaws and petition as noted below.

**GHCHS Minutes - 11/3/14**

Executive Director’s Report – *Brian Bauer*

**Discussion Item #4** - Board chair Jim Salin and Mr. Bauer reported that given recent conversations with the LAUSD and the Board's legal counsel concerning the IRS challenges to STRS and PERS eligibility for charter school employees and inherent conflict of interest concerns when employees or interested parties sit on the Board, the members need to consider whether GHCHS employees will continue on the Governing Board. In anticipation of this change to the composition of the Board, our current charter petition and the GHCHS Governing Board bylaws allow for the change without the need for an LAUSD-approved material amendment to our charter petition. Fortunately, we are prepared for this transition since the Board formed an ad hoc Screening Committee several years ago to screen and forward eligible and suitable at-large, parent, and retired teacher members to the GHCHS Governing Board for its consideration and approval. That same screening committee will review and recommend candidates for the same non-interested groups that comprise the Board. With the removal of employee members recommended by the school's legal counsel for January 2015, Board chair Salin will work with our legal counsel and Board members to develop a proposal for the November Board meeting.

#### **GHCHS Minutes - 11/3/14**

#### **Discussion/Action Item #4 – Changes in Board Composition By Replacing Employee Board Members with Nonemployee Board Members To Address IRS Concerns and Eliminate Conflict of Interest Issues Effective January 1, 2015.**

Mr. Salin stated that the GHCHS Governing Board has always functioned to the benefit of the students and staff. However, in order to eliminate conflict of interest issues that arise for interested Board members such as staff salary and benefits issues, evaluation of the Executive Director, and others, the composition of the GHCHS Governing Board will be changed effective January 1, 2015 as follows:

- Four Employee Board members will be replaced with two to four Community/At Large Board members
- Board membership will be no less than seven and no greater than nine members
- The GHCHS Parent and Retired Teacher Seats Remain
- The Board's Ad Hoc Screening Committee will continue to review applications and make its recommendation to the GHCHS Board for the open Board member positions

#### **Wording from the Charter in place in 2014:**

#### **Composition of the Governing Board**

The Governing Board shall consist of nine (9) voting members:

- two (2) teachers

- one (1) classified staff member
- one (1) parent
- one (1) administrator (other than the executive director)
- one (1) retired GHCHS teacher
- three (3) at large members

In addition, one (1) student member will sit on the Board in a non-voting capacity. Should the law change necessitating a change in Board composition, such change may be made by the GHCHS Governing Board following the recommendation of an ad hoc stakeholder committee established by the Governing Board. The composition of this committee would be similar to that of the standing committees. Such a change would not require District approval. The District shall be promptly notified of any such change.

For a policy or motion to be passed, a majority -- at least five members -- will need to approve.

**2) Serious Questions About Bond Financing and Finances:**

The Charter School Division needs to have a complete understanding of the fiscal condition of the school.

Bond debt doubled in 2017:

	Beginning Balance	Increases	Decreases	Ending Balance	Due Within One Year
Qualified School Construction Bonds Series 2010B	\$ 5,000,000	\$ -	\$ -	\$ 5,000,000	\$ -
School Facility Revenue Bonds Series 2017 A	-	5,420,000	-	5,420,000	-
School Facility Revenue Bonds Series 2017 B Taxable	-	370,000	-	370,000	-
2017 Series A&B Bond Premium	-	149,909	-	149,909	-
2017 Series A&B Bond Issuance Costs	-	(403,378)	-	(403,378)	-
<b>Total Long-Term Obligations</b>	<b>\$ 5,000,000</b>	<b>\$ 5,536,531</b>	<b>\$ -</b>	<b>\$ 10,536,531</b>	<b>\$ -</b>

Where was this money used?

School's budget includes an inordinate amount of revenue from interest:

PROGRAMS	2017-18	2018-19
FOOD SERVICE SALES	\$685,629	\$650,000
LEASES AND RENTALS (FUNDS 62/63/64)	784,381	832,690
INTEREST (FUNDS 62/64)	298,334	354,500
SPECIAL EDUCATION – COP SELPA TRANSFER	264,908	150,000
OTHER MISCELLANEOUS	450,053	232,500
ASSOCIATED STUDENT BODY (FUND 95)	1,239,999	1,200,000
<b>TOTAL LOCAL REVENUES</b>	<b>\$3,723,304</b>	<b>\$3,419,690</b>

Granada's 2016-2017 independent audit report states:

"In October 2010, the School issued California School Finance Authority Education Facilities Revenue Bonds, Series 2010 B Qualified School Construction Bonds in the amount of \$5,000,000. The School used proceeds of the bonds to finance the acquisition,

construction, improvement and equipping of certain charter school facilities utilized by the School and to pay certain costs of issuance of the 2010 B Bonds.

The maturity date of the Series 2010 B Bonds is July 1, 2020 and the bonds bear interest at a rate of 4.426%. Repayment of the bonds consist of interest only annual payments of \$221,300, with principal and any unpaid interest due and payable on July 1, 2020.

On March 8, 2017, 17081 Devonshire LLC, whose sole member is the School, entered into a loan agreement with the California Municipal Finance Authority for the issuance of \$5,420,000 Series 2017 A Tax-Exempt School Facility Revenue Bonds and \$370,000 Series 2017 B School Facility Revenue Taxable Bonds. The proceeds will be used to finance and refinance the acquisition, construction, expansion, remodeling, renovation, improvement, furnishing and equipping of the charter school facilities located at 17081 Devonshire Street, Northridge, CA. The facilities will be leased and used by the School.

The Series 2017 A and 2017 B School Facility Revenue Bonds were sold at an original issue premium of \$149,909 with issuance costs of \$403,378 to be amortized over the life of the debt. Interest is payable semiannually on January 1 and July 1, commencing July 1, 2017." (p. 13)

According to financial reports submitted by Granada to LAUSD, as of June 30 2017, the school reported a net capital assets balance of \$14,842,795 (audited actuals), and per the school's 2017-2018 1st Interim report, the school is projecting to close June 30, 2018 with a net capital assets balance of \$15,806,479. This is an increase of approximately \$1 million, primarily attributed to equipment.

How much cash is the school sitting on? Is the money being invested in accounts that are fully protected by insurance? Why then do they need additional bonds?

Per Granada's 2016-2017 independent audit report, the school reported cash and cash equivalents of \$12,178,043 as of June 30, 2017.

Per Granada's 2017-2018 1st Interim report, the school is projecting to close June 30, 2018 with cash and cash equivalents of \$12,213,168.

As part of the CSD's fiscal oversight process, the CSD requested from Granada a listing of all school bank accounts and the following 10 accounts were disclosed:

Bank Account Name	Account Description	Account Number
East West Bank	GHCHS Operating-Accounts Payable	XXXXXX4689
East West Bank	2010B QSCB Sinking Fund	XXXXXX4705
East West Bank	2010B QSCB Payment Account	XXXXXX4937
East West Bank	2010B QSCB Collateral Account	XXXXXX8389
California Credit Union	GHCHS Checking-Payroll	XXXXXX0635
California Credit Union	ASB Checking	XXXXXX0651
California Credit Union	ASB Money Market	XXXXXX0669
BNY Mellon	2010B QSCB Bond Trustee Account	XXXXXX7150
Wilmington Trust	2017AB Bond Trustee Account	XXXXXX1243
Payden & Rygel	2010B QSCB Investment Fund	XXXXXX8019

Per the school's 2016-2017 independent audit report, "...\$6,470,299 as of June 30, 2017, is held in financial institutions which are either insured by the Federal Deposit Insurance Corporation (FDIC) up to a limit of \$250,000 per depositor or certain non-interest bearing accounts that are fully insured by the FDIC. As of June 30, 2017, the school did not have any cash that was exposed to uninsured deposit risk. At June 30, 2017 the school had two bank accounts in financial institutions whose bank balance exceeded the FDIC insurance coverage by \$5,969,048. The school reduces its exposure to risk by maintaining such deposits with high quality financial institutions. The school has not experienced any losses in such accounts and believes they are not exposed to any significant credit risk on cash and cash equivalents." (p.10)

**October 2010:**

Series 2010 B Bonds have a maturity date of July 1, 2020.

The school reports that it chose to issue a Qualified School Construction Bond (QSCB) because it as an interest-free loan (the federal government rebated the interest cost paid to the bond holders through the American Recovery and Reinvestment Act of 2009). QSCB bond funds were spent for campus repairs and improvements on the LAUSD facility located at 10535 Zelzah: \$2 million to replace HVAC units in the L Building and the other \$3 million for site improvements and upgrades on both the former Kirk Douglass and main Zelzah campus.

**March 2017:**

Series 2017 B Bonds have a maturity date of July 1, 2022. Series 2017 A Bonds have a maturity date of July 1, 2048.

The school reports that GHC issued the 2017 Bond to finance the acquisition of and site improvements on the charter school facility located at 17081 Devonshire. GHC believes it was fiscally prudent to maintain the school's cash reserves and instead borrow the funds for the school's facility expansion and improvement.

The table below is referenced in Granada's 2016-2017 independent audit report.

Long-term obligations include debt and other long-term liabilities. Changes in long-term obligations for the year ended June 30, 2017 are as follows:

	<u>Date of Issue</u>	<u>Interest Rate</u>	<u>Maturity Date</u>	<u>Amount of Original Issue</u>
Qualified School Construction Bonds Series 2010-B	9/30/2010	4.426%	7/1/2020	\$ 5,000,000
School Facility Revenue Bonds Series 2017-A	3/8/2017	5.500%	7/1/2048	5,420,000
School Facility Revenue Bonds Series 2017-B Taxable	3/8/2017	5.000%	7/1/2022	370,000
Total Bonds				<u>\$ 10,790,000</u>

**3) Enrollment does not reflect the needs of the neighborhood:** All surrounding schools have much higher populations of students with special education needs:

School	Enrollment	Students with Disabilities	Count of Students
<a href="#">Granada Hills Charter High School</a>	4,662	7.00%	327
<a href="#">John F. Kennedy High</a>	2,133	16.50%	352
<a href="#">Valley Academy of Arts and Science</a>	1,163	19.90%	232
<a href="#">Northridge Academy High</a>	1,058	16.40%	174
<a href="#">Chatsworth Charter High</a>	1,936	15.40%	299

Any renewal should include a requirement that they include programs that the school educate students with special needs, including those who cannot be served in a traditional, academic environment. [Any request for IEPs should be removed from the enrollment pages on the web site.](#) Students with moderate to severe intellectual disabilities should not be physically segregated from the general population.

Previous documentation has shown that almost 50% of their students are gifted and talented. This rises to the level of a magnet school.

Cole-Gutierrez stated, at the February 20, 2018, Committee of the Whole meeting, that [50% of the students at Granada reside within the pre-charter boundaries](#). How does this compare to other conversion charters? If 300 students were then accepted into ninth grade through the lottery, a few hundred students are unaccounted for in the ninth grade class. How is Granada admitting these students?

The demographic data above does not represent a complete picture, which is provided by the most current California Special Education Management Information System (CASEMIS) report

(below). As addressed in CSD's letter dated 7/28/2017 in response to a similar issue, 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. The CSD is not aware of any evidence indicating that the school has acted or intended to discriminate against any protected student group.

The 2017 CASEMIS report indicated the following:

<b>2017 CASEMIS Report</b>	<b>Sp Ed Enroll #</b>	<b>Sp Ed Enroll %</b>
<b>Granada Hills Charter High School</b>	<b>411</b>	<b>9%</b>
<b>LAUSD Similar Schools from CDE Median</b>	<b>92</b>	<b>4%</b>
<b>Resident Schools Median</b>	<b>252</b>	<b>14%</b>

- a) [Any request for IEPs should be removed from the enrollment pages on the web site.](#)  
 Students with moderate to severe intellectual disabilities should not be physically segregated from the general population.

This issue has been addressed in the CSD's letter dated 7/28/2017, (Attachment D) which indicated that in 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.

Response: Based on CSD's 2017-2018 GHCHS Oversight visit, the school utilizes the Special Day Program (SDP) and Resource Specialist Program (RSP) models for special education students. GHCHS students in the SDP program are served in a co-teaching model (general ed teacher and special education teacher) for classes for mathematics, Social Science and Science. SDP Students are in a Special Education only class for English Language Arts only.

Previous documentation has shown that almost 50% of their students are gifted and talented. This rises to the level of a magnet school.

GHCHS Gifted and Talented Education (GATE) student enrollment data is listed in the chart below (LAUSD Data and Accountability Office). In addition, the most recent census day demographic data for 2017-2018 (below) indicates that GHCHS has a GATE population of 29.1 percent. The data also reveals that the GATE population has declined over time at GHCHS.



The statement “This rises to the level of a magnet school”. is not in the CSD’s purview. We defer to the LAUSD Office of Student Integration Services.

School	Sch. Code	Preferred Location Code	Primary Enrollments	Gifted and Talented Education %	School Year
Granada Hills Charter High	1933746	8681	4,143	42.9%	2009-2010
Granada Hills Charter High	1933746	8681	4,135	52.3%	2010-2011
Granada Hills Charter High	1933746	8681	4,201	48.2%	2011-2012
Granada Hills Charter High	1933746	8681	4,224	46.0%	2012-2013
Granada Hills Charter High	1933746	8681	4,273	32.8%	2013-2014
Granada Hills Charter High	1933746	8681	4,410	24.7%	2014-2015
Granada Hills Charter High	1933746	8681	4,480	38.9%	2015-2016
Granada Hills Charter High	1933746	8681	4,662	28.0%	2016-2017
Granada Hills Charter High	1933746	8681	4,739	29.2%	2017-2018

LAUSD Data and Accountability Office

School	Enrollment	PERCENTAGES														
		F/R Meal	GATE	American Indian or Alaska Native	Asian	Black or African American	English Learner	Filipino	Foster Youth	Homeless	Latino	Native Hawaiian or Pacific Islander	Socio-economically Disadvantaged	Students with Disabilities	Two or More Races	White
Granada Hills Charter High	4,739	48.79%	29.18%	0.36%	17.56%	3.61%	3.04%	9.66%	0.25%	0.02%	39.80%	0.30%	49.36%	8.36%	1.16%	25.51%

\*As of October 2017 Census Day

Cole-Gutierrez stated, at the February 20, 2018, Committee of the Whole meeting, that [50% of the students at Granada reside within the pre-charter boundaries](#). How does this compare to other conversion charters? If 300 students were then accepted into ninth grade through the lottery, a few hundred students are unaccounted for in the ninth grade class. How is Granada admitting these students?

GHCHS Non-resident and resident student enrollment data, and the comparison of Non-resident to resident student enrollment for conversion high schools is listed in the charts below (LAUSD Data and Accountability Office).

2017-2018 Granada Hills High School	Number of Students	Percentage
Non-Resident	2279	48.1%
Resident*	2460	51.9%
<b>Grand Total</b>	<b>4,739</b>	<b>100.0%</b>

Conversion Independent Charter High Schools	2017-18 Resident and Non-Resident Enrollment Count				
	Non-Resident Count	Non-Resident %	Resident Count	Resident %	Enrollment Count Total
Birmingham HS (8557)	1,853	58.75%	1,301	41.25%	3,154
El Camino HS (8617)	1,823	51.11%	1,744	48.89%	3,567
Granada Hills HS (8681)	2,279	48.09%	2,460	51.91%	4,739
Palisades HS (8798)	1,978	64.73%	1,078	35.27%	3,056
<b>Enrollment Count Total</b>	<b>7,933</b>	<b>54.65%</b>	<b>6,583</b>	<b>45.35%</b>	<b>14,516</b>

#### 2017-18 Enrollment by Grade

[Granada Hills Charter High School Report](#)

Name	Total	Grade 9	Grade 10	Grade 11	Grade 12
<a href="#">Granada Hills Charter High</a>	4,739	1,211	1,270	1,119	1,139

*CDE Dataquest*

As an independent conversion charter school, GHCHS maintains an admissions policy that provides a first preference for LAUSD students residing in the pre-conversion attendance area, followed by other LAUSD students, then non-LAUSD students. If space is available, a public random drawing takes place in February or March.

#### 4) Previous Non-Compliance:

The District has issued at least two Notices to Cure and one Notice of Violation to Granada. Have all of these been fully satisfied? Why were parents not directly notified of the Notice of Violation as required by the District?

On October 16, 2015, the CSD issued a Notice to Cure to GHCHS, to require the school to revise its policy of prohibiting parents who exercise their right to opt their children out of the California Assessment of Student Performance and Progress (CAASPP) testing and Granada Hills testing from participating in “senior activities, school extra-curricular activities, and school athletics” This matter was resolved.

On June 22, 2016, the CSD issued a Notice to Cure to GHCHS, to require the school to revise its admission and enrollment practices to ensure that it does not deny prospective resident students the opportunity to be admitted to the “brick and mortar” educational program throughout the school year. The June 22, 2016 Notice to Cure is being addressed as part of the current GHCHS and LAUSD “Dispute Resolution.”

On September 21, 2016, the CSD issued a Notice to Cure to GHCHS regarding the transfer of student body funds to cover payroll. This item was resolved.

On March 3, 2017, the District’s Facilities Services Division issued a Notice of Violation of the Sole Occupancy Agreement to Granada Hills Charter High School based on the findings of the Field Investigation Report dated February 24, 2017. The Notice was issued by the District’s Facilities Services Division March 3, 2017. The school is still in the process of curing all of the facilities issues and this is a proposed benchmark in the renewal.

Regarding notice to parents, it is the CSD’s understanding that per the Board’s Charter Transparency Resolution of January 12, 2016, parent notification is required when the Notice of Violation is for charter revocation. This was not the purpose of the Facilities Service Division letter, therefore, a notice to parents is not required. However, CSD staff did ask the school about this and the school informed parents via written communication.

## 5) iGranada:

This is an independent study program. The law specifies that students with an IEP cannot be placed in this type of program unless the placement is specifically mentioned in the IEP. The report in KPCC was centered around a student with an IEP who was placed in the program against the wishes of his parent. What steps have been taken to ensure that Granada is not currently violating this aspect of the law?

I have also received a report of a student who was forced into the program this year despite having enrolled early. The mother does not want to be publicly identified as she is afraid of retribution. Has the Charter School Division checked with every parent enrolled in iGranada to ensure that they actually want their child enrolled in the program?

GHCHS admission issues and the iGranada program are being addressed as part of the current GHCHS and LAUSD “Dispute Resolution.” Apart from this, per Granada, the

iGranada Program is able to serve students with an IEP by embedded interventions and systemic protocols within its personalized platform. The IEP can and does determine the program placement. If it is determined that iGranada is not the appropriate program placement, another program placement will be offered.

## 6) Pinecrest Campus:

As a private school, this campus held [448 students](#) during the 2002 school year. According to the proposed charter, Granada is going to place 1,425 TK-8 students on this campus. How can this facility handle almost 1,000 additional students?

Granada's board has also implied in the past that the existing buildings are not suitable for use by the school:

12/9/2013

Pinecrest site update – The information-gathering phase continues as we research and visit successful K-8 programs and sites that have IB elementary and middle school programs. The current structures will probably be razed given the age and condition of the buildings. Conceptual renderings have been created by our architect and modular classrooms could be utilized on the site while building gets underway. We are actively pursuing tax-free bond financing which should not cost this school anything and the new school's revenue should pay for the financing. More concrete information will be provided at the next Board meeting and we will discuss the relationship between this school and the new school.

Will these buildings be replaced before starting up the expansion? Is there enough time? Will iGranada students be appropriately separated from the younger children while the two are occupying the same campus?

There are also questions about the actual ownership of the campus. According to bond filings, Devonshire, LLC is supposed to hold title to the property, but tax records do not reflect this. Did Devonshire, LLC properly purchase the property from Granada? Is Bauer in charge of both organizations or are there possibilities for conflicts of interest?

GHCHS has provided Certificates of Occupancy to the CSD as part of ongoing oversight that verify the Devonshire site has a maximum occupancy of 1,523.

## 7) Startup vs. Conversion:

The petition seems to conflate the two terms, but they have specific legal meanings. Can Granada legally separate the requirement that students in the former attendance boundaries have preference to enroll the grades that they are adding?

There would not be a preference for grades TK-8 since it is not part of the conversion.

Shouldn't students entering into ninth grade from the former attendance boundaries have first preference over all other students?

Per the proposed petition: Incoming 9th grade students who reside in the pre-charter attendance area, and rising 8th grade students who are enrolled in GHC (both students who reside in, and outside of, the pre-charter attendance area) will be enrolled and programmed into courses at the same time. Open enrollment and programming for incoming 9th grade students who reside outside of the pre-charter attendance area occurs after this process.

In addition, in the proposed material revision, there will be rising 8<sup>th</sup> graders into 9<sup>th</sup> grade in the 2022-23 school year. The total number of rising 8<sup>th</sup> graders is projected to be 150; the 9<sup>th</sup> grade class enrollment was approximately 1,211 students for 2017-2018.

Will the UTLA contract extend to teachers in the new grades?

Per Granada, yes.

### **8) Student Transition Academy (STA):**

Granada requires every student to attend their STA, even if they have already "transitioned" into the school:

The STA is a graduation requirement for all students. GHCHS wants students to complete it during the summer before they enter the school but also provide opportunities to complete the STA after the first year of enrollment. It is not a condition of enrollment but is a requirement for graduation, and is free of charge.

In the past year, the CSD assigned administrator has not received any complaints about the STA requirement.

### **Summer Transition Academy (STA)**

The Governing Board of GHC approved attendance at the Summer Transition Academy as a graduation requirement for all students beginning with the class of 2011. All new students entering 9 and 10<sup>th</sup> grade must attend and successfully complete the STA. The Summer Transition Academy is designed to provide a successful transition to GHC, orient students to the Charter School climate and campus, acclimate students to the culture of GHC, access current learning and provide a unifying experiences, perform diagnostic test to ensure proper class placement, model a college-readiness culture and develop a four-year academic plan, and introduce families and students to higher education. Students earn 2.5 elective credit in Academy Math and 2.5 credits in Academy English. Students who miss more than four hours' total will receive an "Attendance Fail (ATF)" on their transcript and must complete the STA the following summer. Students who cannot attend the

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summer between 8<sup>th</sup> and 9<sup>th</sup> grade may file an appeal only under extenuating circumstances. Appeals for deferred attendance must explain the extenuating circumstances are considered by a committee. Students with a granted appeal will have to complete the STA the following year. If an appeal is denied, and the student fails to attend, the student will earn a grade of Fail on their transcript and must complete the STA the following summer. STA grades are included in the GHC cumulative GPA. Students who chose not to attend the STA, will not participate in the GHC ceremony or earn a GHC diploma unless an approved substitute is completed in Senior Boot Camp following the expected graduation date.

Students entering GHC in grade 11 and 12 may attend the Summer Transition Academy or apply to his or her Counselor for a substitute course approval. Students who enroll in GHC in grade 9 and 10, leave GHC and then re-enroll, must meet the STA requirement in order to earn a GHC diploma and participate in the GHC graduation ceremony.

The Charter School Division cited the North Valley Military Institute for a similar requirement:

• ➤ Element 8 provides that "[a]ll students enrolling in NVMI must successfully complete an Entrance Camp..." This is a conditional admission practice contrary to the law requiring charter schools to admit all who wish to attend.

The only difference between the two is that NVMI used the words "admission requirement" and Granada used the words "graduation requirement." However, no one goes to high school in order not to graduate. Therefore, a graduation requirement is a defacto admission requirement.