

**STATE OF FLORIDA  
CHARTER SCHOOL APPEAL COMMISSION**

FILED AGENCY CLERK

2026 JUL -1 PM 1:48

INNOVATION PREPARATORY CHARTER,

Appellant/Applicant,

DEPT OF EDUCATION  
TALLAHASSEE FLA

v.

DOE No. 2025-4286

THE SCHOOL BOARD OF BROWARD,  
COUNTY, FLORIDA,

Appellee/School Board.

/

**RECOMMENDATION OF THE CHARTER SCHOOL APPEAL COMMISSION**

The Charter School Appeal Commission (“Commission”) is directed to assist the Commissioner and State Board of Education with an impartial review of appeals from applicants whose charter applications have been denied. § 1002.33(6)(e)1., Fla. Stat. Innovation Preparatory Charter (“Applicant”) filed an application to open a charter school that was denied by the School Board of Broward County. The Applicant appealed, and the Commission held a hearing on April 23, 2026. Commission members reviewed the appeal filed by the Applicant, the response filed by the School Board, and supporting documentation. Based on the hearing and review of the record, the Commission recommends that the State Board of Education uphold the School Board’s decision and deny the Applicant’s charter school application.

**I. Standard of Review**

Section 1002.33(6)(b)3.a., Fla Stat., provides that if a school board denies a charter school application, the school board must “articulate in writing the specific reasons, based upon good cause, supporting its denial of the application.” The specific reasons for denial must be based upon the statutory requirements for charter school applications, Sch. Bd. of Osceola County v. UCP of Central Fla., 905 So. 2d 909 (Fla. 5th DCA 2005), and must constitute good cause for denial. Sch. Bd. of Volusia County v. Academies of Excellence, Inc., 974 So. 2d 1186 (Fla. 5th DCA 2008).

If an application for a charter school is denied, the applicant can appeal that denial to the State Board of Education. For each appeal, the Commission is made up of an evenly split panel, with half the members representing currently operating charter schools and half representing sponsors. The Commissioner of Education, or his designee, serves as chair. The Commission conducts an impartial review and provides a recommendation to the State Board, which makes the final decision to uphold or overturn the decision of the School Board. The decision of the State Board, and this recommendation by the Commission, must be based upon competent, substantial evidence. Imhotep-Nguzo Saba Charter Sch. v. Dept. of Ed., 947 So. 2d 1279 (Fla. 4th DCA 2007). The Commission is not limited to documents contained in the record on appeal, and may consider additional information and can ask clarifying questions in making its decision. School Bd. of Volusia County v. Florida East Coast Charter School, 312 So. 3d 158 (Fla. 5th DCA 2021). The

recommendation to the State Board must include a fact-based justification. Sch. Bd. of Palm Beach County v. Fla. Charter Ed. Found., Inc., 213 So. 3d 356 (Fla. 4th DCA 2017).

## **II. Background**

Charter schools may be created when an individual, group of parents or teachers, a municipality, or legal entity submits an application to a school district, state university, or Florida College System institution. §§ 1002.33(3)(a), (5)(a), Fla. Stat. Applicants must complete the Model Florida Charter School Application (“Model Application”), which contains descriptions of the applicant’s educational, operational, and financial plans. Fla. Admin. Code R. 6A-6.0786. After the application is filed, the sponsor can request applicants participate in a capacity interview, where applicants can explain their plan, demonstrate their capacity to open and maintain a high-quality charter school, and answer questions.

A sponsor must review all charter school applications using the Evaluation Instrument adopted by the State Board of Education. Fla. Admin. Code R. 6A-6.0786. The Evaluation Instrument incorporates the statutory requirements for a charter school application and provides three main areas for evaluation of the application: Education Plan, Organizational Plan, and Business Plan. Once the Evaluation Instrument is complete, the sponsor approves or denies the application. If approved, the sponsor and the applicant execute a charter agreement that details the terms and conditions for the school’s operation. § 1002.33(7), Fla. Stat. If denied, the sponsor must articulate in writing the specific reasons for denial, based upon good cause, and provide a copy to the applicant and the Department along with the supporting documentation. This is commonly referred to as the “denial letter.”

## **III. School Board’s Review of the Application and Appeal**

Innovation Preparatory Charter filed an Application with the School Board of Broward County on September 23, 2024, seeking to open a charter school covering grades K-5. The Application was reviewed by the Charter School Review Committee, which is comprised of experts from various offices within the school district, including Elementary Learning; Exceptional Student Education; Bilingual/English for Speakers of Other Languages (ESOL); Facilities; Budget; Educational Assessment, Analysis, and Research; School Safety and Emergency Preparedness; and the Charter Schools Management/Support Department. The School Board also held a capacity interview on February 10, 2025, where the Applicant, represented by Wanda Collins, answered questions about the Application.

The Charter School Review Committee recommended that the School Board deny the Application, noting fifty (50) different deficiencies across eleven (11) sections of the Application, including Transportation; School Safety and Security; Budget; Financial Management and Oversight; Management and Staffing; Educational Program and Design; Curriculum Plan; Student Performance, Assessment and Evaluation; Exceptional Students; English Language Learners; and School Culture and Discipline. Those deficiencies are outlined in the Innovation Preparatory Charter Deficiencies Summary document, which was part of the package considered by the School Board. Prior to the meeting, the Applicant was notified that the recommendation would be to deny the Application and was given the option to withdraw. The Applicant chose to move forward.

The School Board considered and denied the Application at the May 13, 2025, meeting. No representative from the Applicant spoke at the School Board meeting. The School Board detailed its decision in a letter, sent on May 16 and again on May 23, 2025. The denial letter also included a copy of the Deficiencies Summary document prepared by the Charter School Review Committee.

The Applicant timely filed this appeal to the State Board of Education. The first two submissions were determined to be insufficient and not in compliance with Florida Administrative Code Rule 6A-6.0781, which outlines the procedures and requirements for appealing the denial of a charter school application. The Commission issued a Notice of Insufficiency on August 21, 2025, and a second Notice of Insufficiency on October 1, 2025. The third appeal packet, submitted on October 6, 2025, was accepted. The hearing was initially scheduled for January 2026 and was rescheduled at the request of the Applicant.

#### **IV. Fact Finding and Analysis**

The Commission has serious concerns regarding the capacity of this Applicant to open and operate a safe and successful charter school. Throughout the Application and during the hearing before the Commission, the Applicant, represented solely by governing board president Wanda Collins, failed to demonstrate a cohesive plan and sufficient comprehension of the requirements to operate a school. Overall, the Application did not provide sufficient detail to understand the Applicant's plan and vision. It is not enough to simply restate statutory requirements and say that you will do those things; the applicant must explain the "how" and the "why" to have an adequate plan to run a school.

The Applicant's written argument, although accepted on its third attempt, suffered from these same issues. While the Applicant stated that "the denial was based on misinterpretation of statutory and evaluative criteria, omission of key evidence provided in our application, and incorrect assessment of our educational program," there was not any explanation to help the Commission understand this argument. The Applicant failed to make clear what statutory or evaluative criteria were misinterpreted, what evidence was omitted in the district's review, or what was incorrectly assessed in the evaluation of the proposed educational program. The Applicant's arguments are largely vague and conclusory and failed to direct the Commission to precise locations within the Application where evidence of meeting statutory requirements could be found.

In many cases, an application that is lacking in detail in some areas can be remedied during the Commission hearing. Applicants are permitted to give opening statements, both overall and before each individual issue; to answer questions; to provide additional detail and clarifying information; and to present new evidence to the Commission that the sponsor may not have had during its initial review. It is an opportunity for applicants to have a second chance to present their plans. In this case, the Commission would have greatly benefitted from hearing from the Applicant's subject-matter experts, particularly in areas such as the school budget, curriculum and educational program design, and school safety. Those individuals were not present at the hearing, and on many occasions, the Applicant, represented by Ms. Collins, was unable to answer questions posed by the Commission members. Ms. Collins also declined on eight (8) occasions to provide an opening argument for individual issues being considered.

Ms. Collins, who admittedly did not bring a copy of her Application with her to the hearing, was unable to direct the Commission members to specific pages therein that may have helped the members to better understand her position. Although Ms. Collins stated that the School Board had the incorrect application and that, due to technological difficulties, some of her exhibits may be missing from her original submission, the Applicant did not make any effort during these proceedings to provide corrected or missing documents to the Commission. Taken together, these issues greatly affected the Applicant's appeal.

The Commission conducted a full review of the Application, the denial letter and Deficiencies Summary from the School Board, the capacity interview transcript, and other documents submitted for consideration. The Commission individually considered the eleven (11) sections of the Application that were deemed to be insufficient during the district's review. Based on a review of the record and information gathered during the hearing, the Commission found that there is competent, substantial evidence to deny the Application because none of the eleven (11) sections at issue met the requirements set forth in the Evaluation Instrument and the statutes and administrative rules cited therein. A summary of the Commission's findings is set forth below:

- A. Transportation:** The Commission found that the Transportation section of the Application does not meet the standards set forth in the Evaluation Instrument adopted in Florida Administrative Code Rule 6A-6.0786 (Section 17). This section should describe how the school will address these services for its student body, ensuring that transportation will not be a barrier to access the school. Here, the Applicant failed to present a comprehensive and realistic transportation plan, with the Commission noting that the Application was inconsistent as to how transportation would be provided, and that the amounts allocated for transportation in the budget did not align with reality.
- B. School Safety and Security:** The Commission found that the School Safety and Security section of the Application does not meet the standards set forth in the Evaluation Instrument adopted in Florida Administrative Code Rule 6A-6.0786 (Section 19). This section should provide a description of the school's plan to ensure the safety and security of its students and faculty. The Commission found that the Applicant failed to present an adequate, competent plan to address school safety, noting that this section was very generic and lacked sufficient detail. In addition, based on review of the capacity interview and the information presented during the hearing, the Commission found that the Applicant did not demonstrate sufficient knowledge or understanding of the safety requirements that are required by statute, including compliance with threat management, safe-school officer coverage, and active assailant response.
- C. Budget:** The Commission found that the Budget section of the Application does not meet the standards set forth in the Evaluation Instrument adopted in Florida Administrative Code Rule 6A-6.0786 (Section 20). The Applicant did not present a realistic or sound budget projection and the Commission was not able to ascertain whether revenue projections were accurate because the Application was unclear regarding basic information about the proposed school. At times, the school was referred to as having grades Pre-K through 5, and at other times grades K-5 or K-6. In

addition, enrollment projections in the budget did not match those used in the front of the Application, and there was not a natural progression to the student growth plan. Further, the Applicant based the startup year's funding on a \$40,000 grant, for which no supporting documentation or detail was provided. Based on the foregoing, including review of the capacity interview and the information presented at the hearing, the Commission found that the Applicant's budget does not meet the required standard.

- D. Financial Management and Oversight:** The Commission found that the Financial Management and Oversight section of the Application does not meet the standards set forth in the Evaluation Instrument adopted in Florida Administrative Code Rule 6A-6.0786 (Section 21). This section should describe how the school's finances will be managed and who will be responsible for the protection of student and financial records. The Commission found that the Applicant did not present a clear description of how financial management and oversight would be handled at the school. This section raised serious concerns, with the Commission noting that financial management and oversight is second only to life safety in terms of importance for a governing board. The Commission was unable to locate any reference to a company that would handle bookkeeping, auditing, and other financial matters for the Applicant. At the hearing, the Applicant further explained that her two daughters would serve on the governing board and that due to her oldest daughter's experience running a successful tarot card business, she had the financial background necessary to handle these functions. The Commission found that experience is insufficient to handle financial management at a school governing board level.
- E. Management and Staffing:** The Commission found that the Management and Staffing section of the Application does not meet the standards set forth in the Evaluation Instrument adopted in Florida Administrative Code Rule 6A-6.0786 (Section 11). This section should describe how the day-to-day administration of the school's operations will be structured and fulfilled. The Commission found that the Applicant's plan for management and staffing failed to provide a clear narrative and lacked sufficient detail to be able to understand the management structure of the school. At the hearing, the Applicant failed to adequately respond to questions concerning overall management structure and delineation of responsibilities between the governing board and school administration.
- F. Educational Program Design:** The Commission found that the Educational Program Design section of the Application does not meet the standards set forth in the Evaluation Instrument adopted in Florida Administrative Code Rule 6A-6.0786 (Section 3). This section should describe the educational foundation of the school and the teaching and learning strategies that will be employed. The Commission had concerns regarding the Applicant's plans for reading instruction. Specifically, while 90 minutes of uninterrupted reading time are required, the proposed schedule only showed 60 minutes. In addition, at the hearing the Applicant stated the school would use the Broward County reading program, but also would use a scripted program called "Success for All." The Applicant did not adequately explain how those two programs would complement each other. The Commission also noted a general lack of planning

and foresight in terms of professional development, which is needed to ensure teachers have a base level of training before the students arrive. Finally, based on descriptions provided by the Applicant, the proposed educational program design did not seem likely to lead to improved student performance.

- G. Curriculum Plan:** The Commission found that the Curriculum Plan section of the Application does not meet the standards set forth in the Evaluation Instrument adopted in Florida Administrative Code Rule 6A-6.0786 (Section 4). This section must explain not only what the school will teach, but how and why. The Commission found that there was no concrete plan for curriculum presented in the Application. Throughout the Application, there are references to using district plans, specifically for reading, but the Applicant did not demonstrate knowledge of what materials are used within that plan. In addition, at the hearing the Applicant could not identify what research-based reading program will be used at the school.
- H. Student Performance, Assessment and Evaluation:** The Commission found that the Student Performance, Assessment and Evaluation section of the Application does not meet the standards set forth in the Evaluation Instrument adopted in Florida Administrative Code Rule 6A-6.0786 (Section 5). This section should define what students attending the school should know and be able to do and reflect how the academic progress of individual students, cohorts over time, and the school will be measured. The Commission found that this section does not meet the required standard, as there was no clear understanding of academic accountability in the Application. In addition, the Application mentions using SMART goals, but did not identify what those goals are.
- I. Exceptional Students:** The Commission found that the Exceptional Students section of the Application does not meet the standards set forth in the Evaluation Instrument adopted in Florida Administrative Code Rule 6A-6.0786 (Section 6). This section should demonstrate an understanding of the requirements to serve all students and provide a concrete plan for meeting the broad spectrum of educational needs so that all students are provided with a quality education. The Commission found that this section does not meet the required standard, due to a lack of understanding concerning collaboration with the sponsor to ensure appropriate placement decisions are made for students with disabilities.
- J. English Language Learners:** The Commission found that the English Language Learners (ELLs) section of the Application does not meet the standards set forth in the Evaluation Instrument adopted in Florida Administrative Code Rule 6A-6.0786 (Section 7). This section should demonstrate an understanding of the requirements to serve ELLs and should provide a concrete plan for meeting the broad spectrum of educational needs for all students. The Commission found that the Applicant did not demonstrate sufficient understanding of the procedures required to identify ELL students. In addition, the Application did not demonstrate an understanding of its obligations within the ELL program.

**K. School Culture and Discipline:** The Commission found that the School Culture and Discipline section of the Application does not meet the standards set forth in the Evaluation Instrument adopted in Florida Administrative Code Rule 6A-6.0786 (Section 8). This section should describe the learning environment of the school and provide evidence that the school will ensure a safe environment conducive to learning. The Commission found that the Application demonstrated a lack of understanding of the role and responsibility of charter schools as it relates to discipline and how that could impact legal obligations. Specifically, the Commission had concerns with the Applicant's plan to defer to the district to recommend certain disciplinary actions, which took control away from charter school leadership. Overall, the Commission noted the Applicant had a lack of in-depth knowledge of what is required to operate a school.

**V. Recommendation**

Based on the factual justifications provided above, the Commission recommends that the State Board of Education find that the School Board does have competent substantial evidence to support its denial of the Application based on the Applicant's failure to meet the standards set forth in Florida law and rule for Transportation; School Safety and Security; Budget; Financial Management and Oversight; Management and Staffing; Educational Program and Design; Curriculum Plan; Student Performance, Assessment and Evaluation; Exceptional Students; English Language Learners; and School Culture and Discipline.

**VI. Overall Recommendation**

Based on the foregoing, the Charter School Appeal Commission recommends that the State Board issue a final order upholding the School Board's denial of the Application by denying the appeal of Innovation Preparatory Charter.

July 1st, 2026

  
\_\_\_\_\_  
Jamie Braun, Chair  
Charter School Appeal Commission