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March 10, 2021

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The Honorable Barry C. Dozor
Delaware County Court of Common Pleas
201 West Front Street
Media, PA 19063

**Re: Appointment of a Receiver for the Chester Upland School District,
Docket No. CV-2012-009781**

Dear Judge Dozor:

Earlier today, March 10, Parent Representatives in the above-referenced case filed an Emergency Motion to Compel Disclosure of Documents and Information Related to the RFP Review Process. The Emergency Motion seeks immediate Court intervention to obtain critical documents and information related to the current RFP process, which the Receiver has failed to disclose despite his legal duty to conduct the RFP process in a public manner, and his commitment to the Court to make those materials available.

On the afternoon of March 10, in response to our notification of the filing, the Receiver posted a two-page “Update on CUSD Strategic Options Initiative RFP Process” to Chester Upland School District’s website, enclosed as Exhibit A. However, the “Update” provides only some of the information sought in our Emergency Motion – the identity of the bidders that submitted proposals and the names of the RFP Review Task Force members. Critically, it does not provide any information at all about what is being proposed by each of the bidders that submitted responses, nor does it provide access to non-confidential information regarding the written proposals themselves. For example, parents still have no information regarding which schools may be subject to conversion or new management. The Update also fails to provide information about the guidelines, rubrics, and criteria that the Task Force will be using to review the submissions.

Parent Representatives will be filing an amended Motion that reflects the information provided this afternoon by the Receiver. However, we believe that emergency relief, in the form of an order directing the Receiver to release the proposals themselves and the RFP Review guidelines that will be used to assess them, is still necessary to ensure that Parent Representatives can meaningfully participate in the RFP Process.

Respectfully submitted,

/s/Claudia De Palma
Claudia De Palma, Esq.
Attorney for Parent Representatives

Cc: counsel of record
(via electronic mail and e-filing system)

EXHIBIT A

Update on CUSD Strategic Options Initiative RFP Process

March 9, 2021

The CUSD Strategic Options Initiative RFP process is underway, as ordered by the Delaware County Court of Common Pleas. This memorandum is intended to inform the public and interested parties on the status of the RFP process. More detailed information on the entire Strategic Options Initiative can be found in the Request For Interest and the Request For Proposals as posted on the District's website.

RFP Review Task Force:

As specified in the RFP document, the receiver has appointed an RFP Review Task Force composed of individuals from the Chester Upland School District community and board members from the District. The responsibilities of the RFP Review Task Force are as follows:

- Represent the interests and concerns of the CUSD stakeholder community in the successful implementation of the Strategic Options Initiative;
- Provide objective and meaningful feedback on proposer submissions and presentations;
- Read, review, and critique each RFP submission for clarity, adequacy of solutions to CUSD's needs, and expected outcomes;
- Conduct in-person capacity interviews, and possibly visit the schools where bidding Providers can demonstrate the effectiveness of their programs; and
- Provide and present a report on each Provider submission to the Receiver with recommendations for action.

The members of the RFP Review Task Force are as follows. Each individual was identified and recommended by the CUSD Board because of his/her experience, expertise, and knowledge of the District's needs:

Fred Green

Dr. Jacqueline Irving

Anthony Johnson

LaToya Jones

LaMonte Popley

Tyra Quail

William Riley

Kenneth Washington

The Task Force is being staffed by:

Dr. Leroy D. Nunery II, Strategic Advisor to the CUSD Receiver

John Polk and Jeffrey Caldwell (Associates of Dr. Nunery's company, PlusUltre LLC)

John Pund and Mari Gochowski, J.L. Pund & Associates

The task force will be meeting virtually for the time being and has been oriented to the RFP review process and expectations, as outlined in the RFP document.

RFP Proposals:

There were eight (8) educational organizations that formally expressed interest in the Initiative through the Request for Interest process. As of the deadline of February 26, three (3) organizations submitted formal RFP submissions: Chester Community Charter School (<https://chestercommunitycharter.org/>), Friendship Education Foundation (<https://friendshipusa.org/>), and Global Leadership Academy (<https://www.glacharter.org/>). These formal submissions will be evaluated by the RFP Review Task Force to determine if they meet or exceeds the criteria described in the RFP document. Please refer to the RFP document for selection criteria.

Timetable:

The RFP timetable and process have been approved by Judge Dozor of the Delaware Court of Common Pleas. The RFP Review Task Force is meeting on Wednesday March 10, 2021 for initial discussions on each of the formal proposals as part of its due diligence responsibility. Depending upon the Task Force's collective impressions of the merits, contents, and quality of the proposals, organizations may be invited to present their proposals to the Task Force on a later date in March 2021. Subsequently, the Task Force will make initial recommendations to Receiver Baughn, and it will be his responsibility to decide which, if any, of the proposals should proceed to the next phase of the process. The next phase will include additional discussions by the Review Task Force with proposing organizations, and public presentations. It is expected that the public presentations will take place in April 2021 (dates to be determined). Dates for the remaining steps in the Strategic Options Initiative are outlined in the RFP document, and will be determined by the Receiver in the near future.