



We Are Your Schools

FORT WAYNE COMMUNITY SCHOOLS

March 5, 2026

Dr. Kevin R. Smith
Associate Director of Charter Schools, Outreach and Engagement
University of Southern Indiana
8600 University Boulevard
Evansville, IN 47712

Re: Formal Response to Williams Arts and Technology Academy Charter Application

Dear Dr. Smith:

Fort Wayne Community Schools (FWCS) submits this formal response to the charter school application filed by Williams Arts and Technology Academy (WATA), submitted Dec. 19, 2025, and currently under review by the University of Southern Indiana Charter Schools Office. We respectfully request that USI consider the substantive concerns outlined below as part of its due diligence process prior to any authorization decision.

FWCS is Indiana's largest traditional public school district, serving nearly 30,000 students across 52 schools. We welcome accountability, innovation and educational choice. As such, we are obligated, on behalf of the students and families we serve, to raise significant concerns about this specific application, which we believe does not demonstrate community need or that the proposed charter could responsibly educate children.

I. NO COMMUNITY NEED

A. Existing Schools and Programs in the Proposed Service Area

The application asserts that students in the Hanna-Creighton neighborhood are underserved because local schools have been converted to magnet schools requiring a lottery. This framing misrepresents the FWCS school choice model. Prior to the 2025-26 school year, only nine students living in this area remained on the waiting list for their magnet school of choice. A review of the actual landscape of schools serving this community reveals robust, accessible and high-quality options already in place.

Geographic Context: The proposed WATA location would serve students who already have direct access to multiple FWCS schools within close proximity:

School	Type	Distance from Proposed WATA Site
Adams Elementary	Neighborhood School	1.8 miles
Forest Park Elementary	Neighborhood School	2.3 miles
Washington Elementary	Neighborhood School	1.7 miles
Bunche Montessori Early Childhood Center	Magnet (Montessori)	1 mile
Irwin Elementary	Magnet (STEM)	1.9 miles
Weisser Park Elementary	Magnet (STEAM)	1.8 miles
Whitney Young Early Childhood Center	Magnet (STEAM)	1.9 miles

The application's core premise – that East Central and Hanna-Creighton students are "bused to schools outside their neighborhood" – ignores the reality that FWCS provides transportation throughout the district as a standard service, and that the magnet schools in and near the Hanna-Creighton neighborhood are heavily used by nearby families.

School	% Students Living Within 1 Mile	% Students Living Within 2 Miles
Bunche Montessori	5.04%	24.37%
Memorial Park	4.88%	26.61%
Weisser Park	19.08%	41.49%
Whitney Young	14.22%	39.45%

Note: The application references the Hanna-Creighton neighborhood as underserved. As the applicants themselves acknowledge, the proposed facility, Pilgrim Baptist Church, 1331 Gay St., is located in the East Central neighborhood, *not* within the Hanna-Creighton neighborhood itself. Based on the current FWCS attendance areas, students who live proximate to Pilgrim Baptist Church attend Forest Park Elementary.

FWCS provides all families with:

- Transportation to schools throughout the district
- Open enrollment and lottery processes accessible to all families
- Seven magnet schools with arts, STEAM, Montessori and communication focuses
- Fort Wayne Virtual Academy for families seeking non-traditional options

No student in the FWCS boundary is without a quality educational option. The application cites no community needs assessment, no survey data, no petition from families and no formal study.

In addition to FWCS public schools, seven private schools are within three miles of Pilgrim Baptist Church:

- St Paul's Lutheran School 0.7 miles
- Alyssum Montessori 1.7 miles
- Emmanuel-St. Michael Lutheran School 1.8 miles
- International Leadership School 2.1 miles
- Most Precious Blood Catholic School 2.3 miles
- St. Jude Catholic School 2.4 miles
- Redeemer Classical School 2.5 miles

See Exhibit 1: map of area schools; Exhibit 2: maps of FWCS transportation zones, by school.

B. Arts Programs Already Serving FWCS Students

WATA's proposed identity as an arts-integrated school does not represent an unmet need. FWCS offers extensive, established arts programming at every level with all elementary students receiving art and music instruction as part of each school's core program. In addition to the in-class instruction, many schools have art and music-based co-curricular programs, including those in the very neighborhoods the application claims are underserved.

Club Orchestra at Forest Park, South Wayne and Waynedale Elementary Schools

The Fort Wayne Philharmonic, in formal partnership with FWCS, currently operates the Club Orchestra program at Forest Park Elementary, South Wayne Elementary and Waynedale Elementary. The program is extremely popular, with 264 students participating during the 2025-26 school year. This is a fully subsidized, El Sistema-model orchestra education program available at no cost to FWCS students:

- **Club Kid-O** (Pre-K through Grade 1): Music lessons incorporating singing, rhythm, movement and mallet instruments.
- **Club O** (Grades 2-5): Intensive orchestra training including violin instruction, music theory and ensemble performance, culminating in a concert with the Fort Wayne Philharmonic. This year, students will perform at the Club Orchestra Celebration Concert on May 12, 2026, at the PFW Music Center.

Note on Instrument Lending: The WATA application references a plan to "make use of the Philharmonic's Instrument Loan Program" as a partnership strategy. FWCS contacted the Philharmonic directly to clarify this program. The instrument loan program referenced is run by Philharmonic Friends, a decades-old program that rents instruments to individual families at reduced rates. It does not loan instruments to schools or school districts, and its capacity is extremely limited. It is equally available to any family. See Exhibit 3

b Instrumental Program

FWCS's b Instrumental program provides new or slightly used band and string instruments to FWCS students beginning in middle school to use through high school. The program includes:

- Free instrument loans, funded by the FWCS Foundation
- Free summer music camps
- Free small group instruction
- Individual lessons with a specialist in the student's instrument

See Exhibit 4

Fort Wayne Philharmonic Ensembles in Schools

The Fort Wayne Philharmonic also offers its Ensembles in Schools Program to all FWCS elementary schools, providing two 35-minute performances by four to five professional Philharmonic musicians covering brass, woodwind, strings and percussion and aligned to national and Indiana music standards. A dedicated pre-K program is also offered to FWCS students. *See Exhibit 5*

Fort Wayne Museum of Art (FWMoA)

FWCS has a longstanding, well established partnership with the FWMoA – unique to FWCS and unavailable to private or charter schools. Ind. Code § 36-10-13-7 entitles

- (1) the governing body of the school corporation to appoint the school corporation's superintendent and director of art instruction as visitors who may attend all meetings of the association's governing board;
- (2) the governing body of the school corporation to nominate individuals for membership on the association's governing board, with at least two (2) of the nominees to be elected;
- (3) the school corporation to use the association's facilities and equipment for educational purposes consistent with the association's purposes;
- (4) the students and teachers of the school corporation to tour the association's museum and galleries free of charge;
- (5) the school corporation to borrow materials from the association for temporary exhibit in the schools;
- (6) the teachers of the school corporation to receive normal instruction in the fine and applied arts at half the regular rates charged by the association; and
- (7) the school corporation to expect exhibits in the association's museum that will supplement the work of the students and teachers of the corporation.

FWCS takes advantage of these unique entitlements by regularly bringing elementary students on free field trips to the Museum. Additionally, the FWMoA brings art to FWCS schools through a program called Gallery on Wheels. FWCS begins this exposure to fine art when students enter pre-kindergarten when all students visit the museum or experience Gallery on Wheels as part of the Guaranteed Experiences offered through FWCS' Schools of Success model.

The FWCS Board of School Trustees appoints two individuals to the FWMoA's Board of Directors to maintain this thriving partnership, and all FWCS teachers may visit the Museum free of charge. Students of charter schools would not have the same entitlements to this exposure to the arts. *See Exhibits 6 and 7*

Additional Programs at Nearby Schools

In addition to the arts programs, neighborhood and magnet schools offer numerous co-curricular programs, as well as before and after care. The following programs are currently offered at schools in the proposed service area:

Adams Elementary:

- Robotics Club
- Art Club
- Athletics: Basketball, cross country, flag football
- Before- and after-school care: Champions (on-site)

Forest Park Elementary:

- Chess Club
- Club O
- Club Kid O
- Math Bowl
- Spell Bowl
- Pencil and Palettes (visual arts)
- Study Connection
- Yearbook Club
- Athletics: Basketball, cheerleading, cross country, flag football
- Before- and after-school care options: Champions (on-site), Crescent Avenue Church (offsite), Wellspring (offsite, with tutoring, activities and dinner)

Bunche Montessori Early Childhood Center:

- Art Club
- Hands-on Science Club
- Sewing Club
- Before- and after-school care: Y Care (onsite)

Irwin Elementary School:

- Chess Club
- Garden Club
- Investment Club
- Irwin Ambassadors
- Irwin Podcast
- Robotics Club
- Athletics: Basketball, cheerleading, cross country, golf, soccer
- Before- and after-school care: Y Care (on-site)

Weisser Park Elementary:

- Chess Club
- Garden Club
- Fort Wayne United Boys Group (grades 4 and 5)
- Lego Club
- Robotics Club
- Student Council
- Fort Wayne Dance Collective Partnership
- 50+ elective courses offered *See Exhibits 8, 9 and 10*
- Athletics: Basketball, cross country, flag football
- Before- and after-school care: Y Care (on-site)

Whitney Young Early Childhood Center:

- Coding Day
- Garden Club
- Before- and after-school care: Y Care (on-site)

In the section titled "Culture of High Expectations," the WATA application notes "progression will reflect mastery rather than seat time" and "students will advance through non-graded levels." This approach is not new to the community. Fort Wayne Community Schools has already implemented a structured, mastery focused literacy model that includes homogeneous instructional grouping. The structure allows students to receive instruction that is directly targeted to their individual needs regardless of grade level and has contributed to the district's 17 percentage point increase in IREAD performance.

Given that more than half of WATA's named founding individuals previously worked for FWCS, the use of this model should be well known to the applicants. As such, the proposal does not present a new option rather reflects practices that are already implemented and producing measurable results within the district.

C. FWCS Technology Programs Already Serving This Community

The word "technology" appears in the school's name and defines its instructional identity. FWCS already offers extensive, established technology programming to students in the proposed service area and throughout the district. These are not just plans on a page, they are operational programs serving students today.

1:1 Device Program. Every FWCS student has a personal device. The district's Network Support Services team manages more than 35,000 computers and mobile devices, providing first and second level technical support to all students, teachers, administrators and support staff across 63 buildings. This is not a pilot program or a promise; it is the standard operating environment for every FWCS student.

Computer Science Instruction, K-12. FWCS meets and exceeds Indiana's mandatory computer science curriculum, which requires every public school, including charter schools, to incorporate computer science in its curriculum for students in kindergarten through 12th grade. Indiana has computer science standards in place for grades K-8 and offers a range of high school computer science courses. Indiana currently ranks seventh in the nation for the number of high schools offering a foundational computer science course, according to the 2024 State of Computer Science Education report. FWCS is part of that achievement.

Engineering and Technology Magnet Programs. Three elementary schools directly proximate to the proposed WATA site offer dedicated engineering and technology programs as part of their core instructional identity and have been designated as STEM Certified Schools by the Indiana Department of Education:

- **Irwin Elementary (STEM Magnet, 1.9 miles)** was FWCS' first math and science magnet school. Over time, it developed into a STEM school offering more in-depth instruction in science, technology, engineering and math across the curriculum. Students can participate in a variety of co-curricular activities including Investment and Chess clubs.

- **Weisser Park Elementary (STEAM Magnet, 1.8 miles)** offers a full STEAM-integrated curriculum with dedicated engineering and technology programming, including Lego Club and technology-infused instruction across all subject areas.
- **Whitney Young Early Childhood Center (STEAM Magnet, 1.9 miles)** offers engineering and technology integration beginning in early childhood, including a dedicated Coding Day experience.

Robotics Programs. Robotics is offered as a co-curricular program at multiple schools in and near the proposed service area, including Weisser Park Elementary and Irwin Elementary. These are hands-on, student-led programs using industry-standard robotics platforms.

Technology Resources for Families. FWCS provides a dedicated technology resources portal for families at fortwayneschools.org/families/resources/supported, ensuring that access to technology support extends beyond the school day.

In summary, FWCS offers every element of the technology program WATA proposes, including 1:1 devices, computer science instruction, coding, robotics and technology-infused learning, as an operational reality today. These programs are delivered by qualified staff in schools already serving the students the proposed charter claims are without options.

By contrast, the WATA application's own Table 5 gap analysis frankly acknowledges that the founding team has "minimal leadership implementation in system-wide technology," and the proposed mitigation is to "seek the expertise of individuals with advanced technological pedagogy." No such individual is named. No technology partner is identified. No infrastructure plan is described.

The question USI must answer: Why would families leave a district with operational, staffed technology programs for a school that openly acknowledges it has no one qualified to deliver the technology instruction it promises?

D. Community Partnerships

FWCS partners with hundreds of businesses, governing bodies, churches and community organizations. These aren't just aspirational partnerships, they provide community connections, needed resources and valuable experiences for FWCS students every day.

Through the FWCS Schools of Success model, students in pre-K through 12th grade have Guaranteed Experiences. (See Exhibit 7) Students learn about life in their community, how they connect to it and what future careers are available to them through these experiences. Notable partners include:

- Boys & Girls Club of Fort Wayne
- Fort Wayne Fire Department
- Fort Wayne Museum of Art
- Fort Wayne Police Department
- Fort Wayne TinCaps
- Junior Achievement
- McMillen Health
- Parkview Hospital
- Science Central

When students enter high school, they connect with dozens of industry leaders through Schools of Success powered by 3DE. FWCS Career Academy and Amp Lab at Electric Works. High school students also connect with local universities directly through FWCS' Higher Education Coalition, which includes Indiana Tech, Indiana University Fort Wayne, Ivy Tech, Manchester University, Purdue University Fort Wayne, Trine University and Vincennes University. *See Exhibits 11, 12 and 13*

Love Fort Wayne - Love Our Schools Program

One of FWCS's most distinctive community partnerships is its engagement with Love Fort Wayne and its Love Our Schools initiative (lovefortwayne.com/vision/love-our-schools/). This program exemplifies the district's philosophy that strong schools require strong communities and that FWCS's work is not limited to what happens inside a classroom.

Love Our Schools mobilizes community volunteers, businesses, faith communities and neighborhood organizations to surround individual FWCS schools with coordinated support. Each school is paired with a dedicated School Champion, a community liaison who convenes a network of partners around that school's specific needs and assets.

The CAFE (Community Assets for Families and Education) program at Adams Elementary illustrates how deeply this partnership reaches into the community. Adams Elementary, located less than 2 miles from the proposed WATA site, convenes a regular CAFE gathering that brings together representatives from across Fort Wayne's civic, faith, health and neighborhood sectors. Participants include:

- Love Fort Wayne (School Champion and program staff)
- Parkview Health
- Iris Family Support Center
- Building a Stronger Family
- One Church/County Line Church
- Kids Hope USA
- Harvester Neighborhood Association
- Memorial Park Neighborhood Association
- Eastside Community Neighborhood Association
- Grow Allen County
- Leadership Fort Wayne
- Alive Community Outreach
- Ash Brokerage
- Fort Wayne Police Department
- Junior Achievement/Pacific Life

This is not a list of organizations that sent a letter of support. These are partners who show up repeatedly, consistently and in person to build a network of care around Adams Elementary students and their families. Attendance records from the 2025-26 school year show the same individuals and organizations returning meeting after meeting.

The breadth of this coalition reflects a fundamental truth about what FWCS does that no new charter school can replicate: it has spent years building the trust, relationships and infrastructure that connect families to the full range of community support they need. When a family at Adams Elementary needs health services, housing navigation, legal support, food assistance, or

mentorship for their child, there is a network already in place to help them because FWCS has spent years building it. This same network is in place formally and informally throughout the district.

The WATA application offers no equivalent. It names no community partners beyond the Fort Wayne Housing Authority. A school’s community partnerships cannot be conjured from aspirational language. They are built over time, through consistent presence, earned trust and sustained investment. FWCS has done that work. The proposed charter school has not. *See Exhibit 14*

E. FWCS Academic Progress Data

FWCS has demonstrated sustained and significant academic improvement in recent years, with gains across all measured categories:

School Year	IREAD-3 Pass % (Spring+Summer)	ILEARN ELA 3-5 Pass %	ILEARN ELA 6-8 Pass %
2020-21	65.10%	25.4%	24.46%
2021-22	70.20%	28.8%	22.90%
2022-23	70.90%	29.8%	24.20%
2023-24	76.40%	31.7%	25.77%
2024-25	82.50%	33.8%	27.22%

Over the five-year period shown, FWCS IREAD-3 pass rates have improved by more than 17 percentage points. ELA proficiency in grades 3-5 has improved by more than 8 percentage points. This is not a district standing still. These gains represent real academic progress for children, achieved while serving a high-poverty, high-needs student population.

Of particular note are improvements among minority subgroups. The WATA application states that 61% of students living in the neighborhoods it proposes to service are African American. FWCS has improved all student subgroup data over the past four years on the IREAD assessment, including a 30% increase on IREAD for our African American students nearly eliminating the achievement gap. Our district average is 82.5% while our African American students are at 81.6%.

Ethnicity	2020-21	2021-22	2022-23	2023-24	2024-25
District Average	65.10%	70.20%	70.90%	76.40%	82.50%
Asian	70.70%	75.00%	65.70%	78.10%	82.60%
Black	51.30%	55.60%	59.90%	68.80%	81.60%
Hispanic	59.40%	62.00%	64.80%	67.50%	71.50%
Multiracial	58.50%	72.30%	73.90%	78.40%	88.20%
White	77.70%	82.40%	81.80%	85.90%	89.60%

FWCS also tracks the academic performance of students who return from charter schools to FWCS. The data is sobering:

School Year	Charter Returnees (Test Takers)	Charter ILEARN ELA Pass %	Charter ILEARN Math Pass %	FWCS ILEARN ELA Pass %	FWCS ILEARN Math Pass %
2020-21	26	3.8%	7.7%	24.9%	21.6%
2021-22	29	20.7%	10.3%	25.8%	25.7%
2022-23	32	6.5%	3.1%	27.0%	25.9%
2023-24	22	13.6%	0.0%	28.8%	25.4%
2024-25	26	0.0%	0.0%	30.6%	27.6%

Of particular note: Of the students who returned from charter schools to FWCS in the 2024-25 school year, not a single student passed the state standardized tests. Every year shown in this data, charter school returnees significantly underperform their FWCS peers. The founding team of WATA, who collectively led this district for more than 150 years, was aware of this pattern. It is one of the primary reasons they previously opposed charter school expansion.

F. History of Charter School Failures in Fort Wayne

Fort Wayne's history with charter schools should inform USI's evaluation of this application. Several charter schools have been authorized for Fort Wayne and subsequently failed:

- **Timothy L. Johnson Academy** - Fort Wayne's first charter school, opened 2002. Originally chartered by Ball State; charter revoked in 2013 for poor academic performance. Trine University then authorized the school.
- **Urban Brightest** - Chartered by Ball State University (2003-04). Closed after a single year due to financial difficulties and low enrollment.
- **Imagine MASTER Academy and Imagine on Broadway** - Chartered by Ball State University (2007-13). Charters revoked in 2013 due to poor academic performance.
- **Thurgood Marshall Leadership Academy** - Chartered by the Indiana Charter School Board (2012-19), working in partnership with American Quality Schools and the Fort Wayne Urban League. Charter revoked in 2018 due to financial difficulties, academic performance and low enrollment.
- **Smith Academy** - Chartered by Grace College, opened 2012. After 14 years of operation, current enrollment is 91 students in K-12.

At least three other organizations attempted unsuccessfully to open charter schools in Fort Wayne, including a 2022 proposal by Fort Wayne Preparatory Academy. The application was withdrawn following community opposition and a clear demonstration that local schools were already serving the community effectively.

G. Fort Wayne's Charter School Performance

According to Indiana performance data, Fort Wayne charter schools rank in the bottom 50% of Indiana charter schools, with average math proficiency of 11% and reading proficiency of 12%, compared to Indiana charter averages of 20% and 26% respectively. The history of charter schools in Fort Wayne is a history of high expectations followed by poor outcomes, unsustainable enrollment, and, in most cases, closure.

Adding another charter school operated by first-time charter operators with acknowledged gaps in operations, compliance and finance does not serve the children of Fort Wayne. Every year, FWCS welcomes back students from local charter schools and finds they are academically behind their peers, as documented in the data in Section I above.

H. USI's Own Struggling Fort Wayne Charter School

FWCS respectfully draws USI's attention to a directly relevant data point within its own portfolio. USI currently authorizes the Indiana Agriculture and Technology School (IATS) Fort Wayne campus, which opened in August 2025 and is also located within FWCS boundaries.

Enrollment Reality vs. Projections

IATS Fort Wayne projected an enrollment of 60 students in its first year, 20 students per grade across grades 7-9. According to the Indiana Department of Education, the school's official enrollment for 2025-26 is five students.

Staffing

The IATS Fort Wayne website lists six staff members directly associated with the Fort Wayne campus. That is more staff than students. By any reasonable measure, this is not a financially sustainable model.

Implications for WATA Authorization

FWCS does not raise this to criticize IATS or its mission. We raise this because USI is being asked to authorize a second charter school in Fort Wayne at the same time its existing Fort Wayne charter school is operating at a fraction of its projected enrollment with a cost structure that cannot be sustained by the students it currently serves.

The Williams Arts and Technology Academy projects 120 students in year one. IATS projected 60 and enrolled five. Before authorizing another new school in this community, USI should account for the demonstrated gap between charter school enrollment projections in Fort Wayne and the reality of actual demand.

USI should require the applicants to provide a rigorous, independently verified enrollment demand analysis to ensure financial viability of another school.

II. CRITICAL OPERATIONAL GAPS WITHOUT CREDIBLE PLANS

A. Summary of Identified Gaps (Table 5)

Table 5 of the application is an "Identified Gaps" analysis that openly acknowledges the founding team lacks sufficient expertise in the following areas:

- Operations management, including charter financing and IDOE reporting
- Marketing and enrollment strategy
- Special populations compliance reporting
- Technology infrastructure development
- Fundraising and philanthropic partnerships

For each gap, the mitigation strategy offered is merely hopeful and non-specific, using phrases such as "collaborate with IDOE," "seek the expertise of individuals" and "connect with philanthropic individuals." These are not operational plans; they are acknowledgments of deficiency dressed as solutions.

B. Technology Gap: The Central Deficiency

The technology gap deserves particular scrutiny given that "technology" appears in the school's name and defines its instructional identity. Technology integration is described throughout the application as a defining feature of the Academy's instructional model, promising 1:1 devices, digital tools, coding, robotics and technology-infused learning across every content area.

Of additional concern: The founding team consists primarily of retired educators and administrators, none of whom appear to have backgrounds in the technology field that defines this school's identity. A school cannot credibly put "technology" in its name, build its entire instructional identity around technology integration and simultaneously acknowledge it has no one with the expertise to deliver it.

USI should require the applicants to demonstrate with specifics how this foundational gap will be filled before students are enrolled, including named individuals, contracted service providers and an infrastructure development plan.

C. Special Populations Compliance

The application acknowledges no specific experience with IDOE compliance reporting for special populations and offers no named individual, contracted service provider or concrete mechanism to ensure compliance with IDEA and Article 7 requirements for special education students. Additionally, the application provides no evidence that WATA will comply with the requirements for English language learners in Ind. Code § 20-30-5 et seq. and 20 U.S.C. § 6312(e)(3) & § 6826. Children with disabilities and those who do not speak English as their primary language deserve better than what WATA would offer.

D. Rushed Timeline

As of the date of this application:

- No principal has been hired or named
- No academic director has been identified
- No teaching staff have been hired
- No facility agreement has been finalized
- Curriculum framework is listed as "In Progress"
- Most milestones in the Gantt chart are listed as "Planned"

The application proposes to hire a principal in March 2026, complete facility renovations by May 2026, recruit and onboard teachers by July 2026, and open to 120 students in August 2026. This timeline is not credible for an organization that has never operated a school.

This timeline runs contrary to the [Charter Process Timeline](#) outlined by USI. USI's own process states 18-24 months prior to opening should be the explore and engage stage. The school application should be submitted 12 months before opening and should include an enrollment plan, facility approach and student support plans. An application review and capacity analysis are to take place nine-12 months before opening. In this case, WATA identifies the earliest date of planning to be April 2025 when "space renovations, inspections and code compliance" started. That is just 16 months prior to the proposed opening. The application was submitted in December 2025, just eight months prior to the proposed opening. At the time of the public

hearing, it is just five months until opening, and there is clearly a significant amount of work yet to be done to open a new school.

E. Safety of Proposed Facility

The WATA application states:

“Preliminary site evaluations indicate that the space meets local zoning and building code requirements and can accommodate the school’s projected enrollment for Years 1 and 2. The Facilities Committee is currently working with local contractors and city officials to finalize renovation plans and inspection timelines.”

The application does not cite any references related to the “[p]reliminary site evaluations” or including any attached letters or documents related to the evaluations of Pilgrim Baptist Church. The facility is currently classified as Assembly occupancy (Group A-3) under the Indiana Building Code. Converting this space to Educational occupancy (Group E) triggers a cascade of regulatory requirements that the application does not address, and the proposed budget does not fund.

The FWCS Facilities Department advised the space likely does *not* meet state and local regulations for charter schools and education spaces. The following areas highlight concerns detailed in Exhibit 15.

Sanitary Schoolhouse Rule (410 IAC 33) requires verification of classroom square footage per student, mechanical ventilation systems capable of continuous fresh air exchange, restroom fixture counts adequate for the enrolled population and compliant outdoor play space. None of these requirements are addressed in the application, and no architect-certified documentation has been submitted.

Occupancy Reclassification from Assembly to Educational occupancy likely triggers requirements for enhanced fire alarm systems, possible sprinkler installation, exit reconfiguration and corridor fire-rating compliance. The cost of these improvements is not reflected anywhere in the submitted five-year budget, which allocates only \$3,500 for rent and \$5,000 for maintenance in the first year with no capital renovation reserve.

ADA Accessibility is required for schools. This could include elevator installation, if space is used on multiple floors, as well as restroom retrofitting and accessible-route modifications. These costs are similarly unbudgeted.

Zoning and Traffic may require special use approval for school operation, a traffic impact study and a drop-off stacking plan. None of these have been addressed.

The overall regulatory risk profile of the proposed facility is high. Authorization would require, at minimum, architect-certified compliance drawings, fire marshal occupancy determination, Indiana Department of Health approval under 410 IAC 33, ADA certification, zoning confirmation and a revised capital budget reflecting the cost of required modifications. None of this documentation has been provided.

A school that cannot demonstrate it can legally and safely house its students on opening day is not ready to open. USI should require full facility compliance documentation before any authorization decision is made.

F. Financial Viability Concerns

The proposed 5-year budget projects Year 1 total revenue of \$1,656,007.60 against total expenses of \$1,529,234.00, yielding a projected surplus of approximately \$126,773. However, this projection depends on:

- **\$500,000 in donations** - representing 30.2% of Year 1 revenue. This is a single-year infusion with no recurring source identified in Years 2-5. Year 2 projects total revenue dropping to \$1,382,509.50 despite increased enrollment, because this donation revenue disappears entirely.
- **Enrollment of 120 students in Year 1** - given that IATS projected sixty students and enrolled only five, this assumption deserves serious independent scrutiny. Given that the application identifies marketing and enrollment strategy as gaps in the knowledge and skillset of the founding individuals, it seems unlikely that WATA will hit enrollment targets
- **No facility costs** - the budget shows \$3,500 in rent/lease for Year 1. As the school proposes to operate out of Pilgrim Baptist Church, any rent agreement between the school and the church - where a board member manages church finances and the founder is the Head of Music Ministry - must be fully disclosed and independently validated. FWCS estimates needing a fixed annual expense of \$1,500,000 from FY 2026 through FY 2030 to address facility needs.
- **Salary projections** - the budget allocates significant staffing costs but proposes to open with no principal named, no teachers hired and no academic director identified, making these projections speculative. The salary line item increases by 2% each year over the 5-year budget but does not take into account the increase in staffing that would be needed for the projected increase in enrollment.
- **No financial disclosures** - the founding organization has made no financial disclosures regarding the existing assets, liabilities or financial condition of the organizing entity.

The budget also reveals no allocation for transportation (listed as \$0), despite the application's stated commitment to serving students from across the community – including those in a community other than where the school is located. It states, “Partnership with Local Transportation Providers: The school will contract with an approved bus company to provide morning and afternoon routes serving key neighborhoods with high-student enrollment.” Why would WATA not include that contract expense anywhere in their financial plan for the first five years? *See Exhibit 16*

III. CONFLICTS OF INTEREST AND GOVERNANCE CONCERNS

A. The Pilgrim Baptist Church Relationship

The proposed school facility is Pilgrim Baptist Church, 1331 Gay St. The following overlapping relationships exist between the school's leadership, its governing board and its proposed landlord:

- **Dr. Debra Faye Williams-Robbins**, the school's founder and proposed leader, is the Minister of Music at Pilgrim Baptist Church.
- **Lawrence Campbell**, a member of the governing board, is the Treasurer of Pilgrim Baptist Church and manages the church's finances, payroll and IT operations. The school would pay rent to an institution whose financial officer sits on the school's governing board.

The application states that Lawrence Campbell plans to recuse himself from decisions involving the facility arrangement. A recusal plan is not a conflict-of-interest policy, and a recusal that removes the board's financial expert from a foundational financial decision – the school's facility – does not resolve the structural concern. USI should require:

- A fully arms-length facility agreement, independently reviewed
- A comprehensive written conflict-of-interest policy
- Disclosure of all financial terms of the proposed lease arrangement that details the rent, utility sharing, maintenance and repairs, ownership of materials, equipment and furniture purchased for the school and kept on the premises in the event of closure of the school
- An independent assessment of whether the church facility is appropriate for a school serving children

The proposed arrangement, in which a public charter school pays rent to a church whose treasurer and financial manager sits on the charter school's governing board, raises questions about the appropriate use of public education funds. Charter school funding flows from state and federal education dollars intended for students. USI should ensure that the facility arrangement is fully transparent, publicly disclosed and consistent with applicable law governing the relationship between public charter schools and religious institutions.

B. Geographic Misrepresentation

The application prominently positions the school as serving the Hanna-Creighton neighborhood. As noted above, the proposed location at 1331 Gay Street is in the East Central neighborhood, not Hanna-Creighton. This geographic framing in the application appears to support a narrative of community need that the actual location does not support.

C. Former Opposition to Charters by Applicants

The application itself, under the section titled "Community Concerns," contains the following admission:

"Negative comments or remarks that Founding members shared about charters when they were part of another entity may push others to question their shift in acceptance of charters at this time."

This is a remarkable and unexplained admission. The founding team, composed largely of former FWCS administrators who served in senior leadership roles, publicly opposed charter school expansion while employed by this district. The application provides no substantive explanation for the change in position.

The founding team's combined service to Fort Wayne Community Schools spans more than 150 years. Among them, the founder herself oversaw the district's Family and Community Engagement Center, created expressly to connect with families and remove barriers to student success. She served as a Cabinet-level leader responsible for community partnerships, student support systems and equity of access across the district. If the needs of students in Fort Wayne's highest-poverty neighborhoods were not visible to this team during decades of senior leadership, this would not be the appropriate group of individuals to effectuate that change now.

Furthermore, the founding team's previous opposition to charters was rooted in documented student outcomes, specifically the pattern of poor academic performance and the harm done to students who returned to FWCS from local charter schools. That data, shown in Section I, has not improved. If anything, the 2024-25 data represents the worst outcomes yet recorded.

USI, as authorizer, should consider both admitted past and present statements when evaluating the motivations of the applicants. The Indiana charter authorization process is built on transparency and good faith. The public and USI deserve to understand the full context of this acknowledgment and a credible accounting of what changed and why.

CONCLUSION

Fort Wayne Community Schools does not make this submission lightly. We raise these concerns not out of institutional self-interest, but out of genuine obligation to the children the Williams Arts and Technology Academy proposes to serve.

Taken together, the concerns raised in this letter present a pattern that USI should not overlook:

- The school would operate in a community already well-served by FWCS' arts, technology and enrichment programs.
- Students returning from Fort Wayne charter schools consistently and dramatically underperform their FWCS peers, including zero passing state standardized tests in 2024-25.
- The school's own gap analysis reveals it lacks qualified expertise in the very subject - technology - that appears in its name and defines its instructional identity.
- No principal, teachers, academic director or facility agreement is in place, with a proposed August 2026 opening.
- The enrollment projections on which its financial sustainability depends are contradicted by USI's own experience authorizing a charter school in the same city just months ago.
- The facility arrangement raises unresolved governance and conflict-of-interest concerns.
- The founding team publicly opposed charter schools while leading this district, then offered an unconvincing explanation for their change in position.

We respectfully request that USI require the following before any authorization decision is made:

- Documented evidence of community need beyond informal conversations, including formal outreach data and family interest surveys;
- A credible, specific operational plan addressing each identified gap, including named personnel and contracted service providers for technology, special populations compliance and charter finance - not aspirational language;
- A demonstrated plan for how a school with "technology" in its name will deliver technology-integrated instruction without any named technology expert on its founding team or identified implementation plan;
- An independently verified enrollment demand analysis that accounts for the demonstrated gap between charter school enrollment projections and actual enrollment in Fort Wayne, as evidenced by USI's own IATS Fort Wayne experience;
- The site analysis used by WATA to show that the proposed facilities are safe for students and up to code;
- A fully arms-length facility agreement that addresses the governance concerns arising from the overlapping relationships between the school's leadership, its governing board and Pilgrim Baptist Church; and
- Full financial disclosure from the organizing entity.

Authorization is a promise to children. Every concern raised in this letter is ultimately about whether that promise can be kept. FWCS is available to discuss these concerns at any time and welcomes the opportunity to provide additional information.

Respectfully submitted,



Dr. Mark Daniel, Superintendent
Fort Wayne Community Schools



Noah Smith, Board President
FWCS Board of School Trustees