



Columbia
PUBLIC SCHOOLS

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December 15, 2025

Members of the State Board of Education,

We the undersigned submit this letter as an official objection to the application of Frontier Schools to open a charter school in Boone County. The application lacks a demonstrated need in our region, offers misleading claims, relies on erroneous assumptions, and fails to adhere to governing statutes.

Most detrimental to our community, the law which allows for the expansion of charter schools into Boone County (and Boone County alone) was impermissibly passed by the State without local notice and without local voice. The law is unlawful, unconstitutional, and should be struck down by the Court.

Unconstitutional

The State of Missouri cannot target a single county for the expansion of charter schools without a reason. It does not matter if the county is the geographical area represented by the legislative sponsor of the bill or the preferred expansion location of a handful of elected representatives. And, if the State does try to pass a law targeting only one group of its residents, the State cannot ignore its obligations under the Missouri Constitution to provide notice to that same group of residents prior to passage of the new law.

The State of Missouri ignored each of these principles when it passed and approved Senate Bill 727 – expressly **to target Boone County (and Boone County alone)** for the expansion of where charter schools can open. The State decided to target Boone County for charter expansion without explanation, justification, or rational basis. The State refused to provide Boone County residents with required notice and refused to allow local voices to be heard. The State's decision to target Boone County for the expansion of charter schools violates state law and the Missouri Constitution.

No Demonstrated Need

Columbia Public Schools—along with every other public district in Boone County—is and has always been an accredited district. In the most recent evaluation by the State, CPS ranks in the top 15% of all public school districts in the state, performing above the State average for MAP and ACT in every content area. To allow the unnecessary encroachment of a duplicate school district knowingly harms the successful students in Columbia Public Schools, with the Frontier charter school projecting to take more than \$4,000,000 in public dollars away from our local district in the first year of operation and more than \$9,000,000 by year five.

Frontier claims a charter is needed in Columbia to address the achievement gap in student subgroups, but the application fails to identify a single mitigating action that is not currently being employed by CPS. In fact, Frontier does not even articulate a plan in their submitted enrollment strategy to attract these underperforming subgroups.

Instead, Frontier plans to enroll any “eligible student in Boone County” on a first-come, first-served basis or, if there are more applicants than spots, with a lottery. This does nothing to reach an underserved demographic of subgroup students.

Leadership of the Missouri Charter Association and Saint Louis University confirmed this reality, telling CPS that the intended audience for a Frontier charter school would be students who are currently enrolled in private schools. Frontier does not plan to serve a high-risk population; it intends to use millions in public dollars to open a selective privately-run school for families who are currently paying tuition.

Misleading Claims and Erroneous Assumptions

In its application, Frontier explicitly states that its enrollment strategy and financial projections are based on accepting “eligible students in Boone County”. This approach to school growth is not permitted under state law, which limits charter student enrollment to the residential boundaries of the local school district in which a charter is located. Frontier cannot open a charter school inside of Columbia district boundaries and then enroll students residing elsewhere in Boone County.

Frontier states its schools “promote inclusive practices that support special populations” including students with disabilities. State data shows otherwise.

According to DESE data from all available years, the average percentage enrollment of students receiving special education services across all Frontier’s existing schools was 6.13% while the average for CPS was double that percentage at 12.5%. Similarly, over the last 4 years of testing, Frontier KC administered state assessments to special education students in only two of seven disability categories. By comparison, CPS administered state assessments to special education students in all seven categories. In other words, Frontier has an established track record of serving fewer special education students than CPS, both in volume and in scope.

Frontier also points to “capacity pressure” in support of charter expansion, claiming Columbia needs more elementary schools. Frontier is either unaware or ignoring the fact that CPS opened two elementary school additions in 2024 and 2025 and is opening a new elementary school in 2026. These capacity expansions were funded by voters with bonds totaling more than \$60 million after detailed demographic studies were completed.

Frontier’s focus on capacity also ignores the reality of the effect charters have had on other public districts. Since charters have come into St. Louis, their local public district has seen a 30% drop in enrollment and has a current building utilization rate of 52.4%. Saint Louis taxpayers are funding multiple duplicate systems and paying for buildings that are half empty.

Expanding school capacity in a local community should be based on a detailed review of community needs, not on the business interests of a for-profit charter network.

No Local Voice

In addition to concerns about Frontier's application, there are disquieting issues related to Saint Louis University in its sponsorship role. State law requires sponsors to publish and adhere to submission procedures for reviewing and approving a charter application. State law also requires charter applicants to notify the local school board within five days of submitting an application to a sponsor for approval. Here, SLU failed to hold Frontier to SLU's submission procedures for the review and approval of Frontier's application. And Frontier failed to notify CPS as required when it first submitted its application to SLU. These failures violated state law and prevented any opportunity for local voices to be heard as part of the sponsorship approval process.

SLU's submission procedures require a prospective charter to document evidence of interest from families the charter intends to serve. There has been no public engagement to determine support in Columbia for Frontier's publicly-funded charter.

The lack of local public engagement is reflected in the application's lack of local leadership, with the application seeking to open a school that will be entirely managed and overseen from out-of-town. The proposed governing board (which is the same as its existing board) includes only one member with a Columbia address. Notably, there are multiple board members with addresses outside the state of Missouri, which is a violation of state law. Frontier plans to use corporate administrators in Kansas City to operate a school in Columbia, and SLU plans to oversee that operation from St. Louis. The children of our community deserve a hands-on, physically present commitment from their school administrators and we find the proposed structure thin and unrealistic.

The lack of local knowledge is also reflected in Frontier's financial projections. Public school districts in Boone County are facing a changing local revenue model for the first time since voters approved a senior property tax freeze. It is unknown what effect this will have on revenue, as the percentage of households that have opted in are not linked to their assessed valuations. 2025 will be the first year the freeze is applied, and a portion of revenue will remain flat in future years, leading to an increasing gap between previous revenue projections and the amount actually collected. There is no evidence that Frontier's single-sheet budget even attempts to account for this complicated revenue structure.

The haphazard nature of Frontier's application is even more obvious in other places, where Frontier has apparently chosen to flatly "copy and paste" from their original application for a Kansas City location. When describing how Frontier developed their goals in section C4 (p. 19), Frontier neglected to change the name of the local district to Columbia. Instead, it reads, "the Performance Contract requires that academic goals meet or exceed the aggregated pupil performance of Kansas City Public Schools." This is in keeping with the fact that MO Charter Association and SLU leadership characterized Frontier as an "education franchise".

Children in our community deserve better than a "copy and paste" effort. The lack of attention to the application by both the applicant and the sponsor is extremely concerning when this charter intends to take millions of local taxpayer dollars. The fact that these groups are using a "copy and paste" approach to the application shows an unacceptable lack of preparation and a disregard for our local community.

Of course, the only way to truly gauge support for a charter is at the ballot box. Boone County taxpayers deserve a local voice in deciding if we want our local money to be diverted from existing local public school districts.

Application Should Be Denied

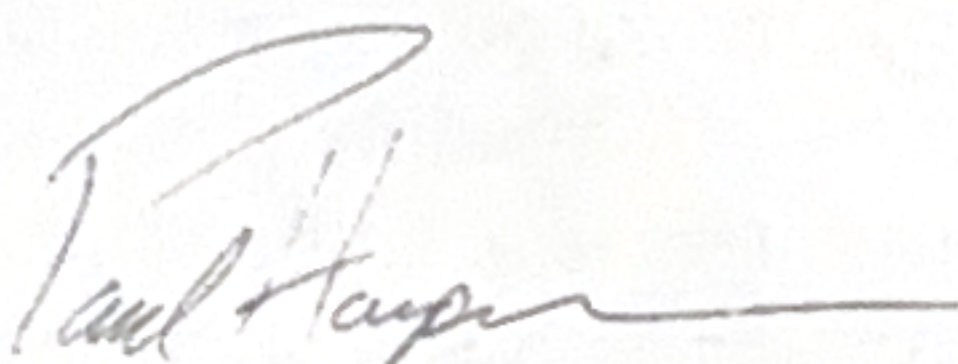
We implore State Board members to vote against the approval of this charter. Frontier is not invested in the success of Columbia's students, as demonstrated by their lack of preparation, the absence of a feasibility study or public engagement, and their stated intent to take millions of dollars from the local public district to open a school for students currently attending private school. We respectfully ask that you consider our 150-year history of deep community partnership and outstanding commitment to the well-being and academic success of every student and deny this charter application.

Sincerely,

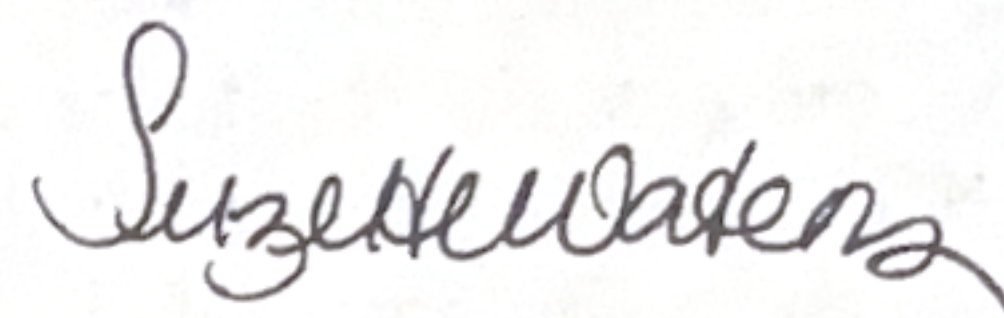
The Columbia Board of Education



John Lyman, President



Paul Harper, Vice President



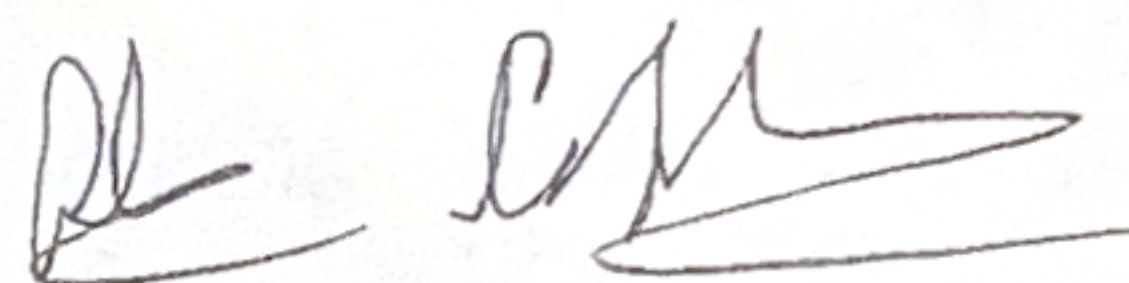
Suzette Waters, Member



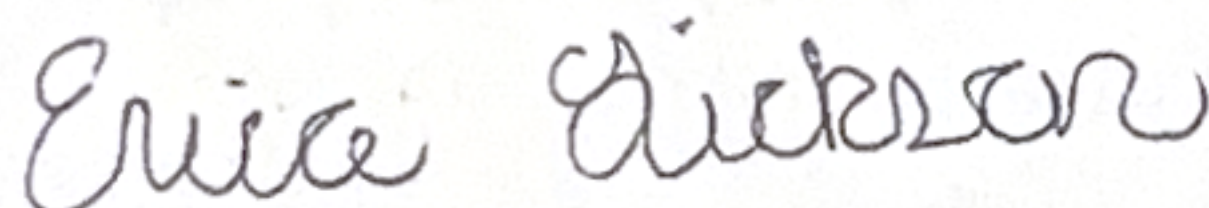
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April Ferrao, Member



Alvin Cobbins, Member



Erica Dickson, Member