

State Public Charter School Commission 2018 Recommendation Report

Charter Application for IMAG Academy

Academic Plan, Organizational Plan, and Financial Plan Evaluation Jennifer Higaki John Rizzo Sylvia Silva Danny Vasconcellos

Academic Capacity, Organizational Capacity, and Financial Capacity Evaluation Martha Evans

Patricia Hamamoto Randolph Moore

Introduction

In 2012, the Hawaii State Legislature passed Act 130, replacing the state's previous charter school law, Hawaii Revised Statutes ("HRS") Chapter 302B, with our new law, codified as HRS Chapter 302D. Act 130 instituted a rigorous, transparent accountability system that at the same time honors the autonomy and local decision-making of Hawaii's charter schools. The law created the State Public Charter School Commission ("Commission"), assigned it statewide chartering jurisdiction and authority, and directed it to enter into State Public Charter School Contracts ("Charter Contract") with every existing charter school and every newly approved charter school applicant.

The 2018 Request for Proposals and the resulting evaluation process are rigorous, thorough, transparent, and demanding. The process is meant to ensure that charter school operators possess the capacity to implement sound strategies, practices, and methodologies. Successful applicants will clearly demonstrate high levels of expertise in the areas of education, school finance, administration, and management as well as high expectations for excellence in professional standards and student achievement.

Evaluation Process

Following the advice and training from national experts and the experience gained in previous application cycles, the Commission created standardized evaluation forms, provided evaluator training, and assembled evaluation teams based on the national best practices, policies, and standards needed to authorize high-performing charter schools. For the 2018 application cycle, each application was assessed by two evaluation teams. One evaluation team reviewed the academic, organizational and financial plans of each application. Another team assessed the capacity of the applicants to carry out the academic, organizational, and financial plans of each application. The highlights of the evaluation process are as follows:

Proposal Evaluation. The Commission's Applications Committee conducted a completeness check to ensure that both evaluation teams were sent complete submissions of the application to review and evaluate. Both evaluation teams read and reviewed each application. The academic, organizational, and financial plans of each application were assessed by one evaluation team. This team also conducted a clarification interview with each applicant so that the applicant could clarify its application.

Capacity Evaluation. An evaluation team charged with evaluating academic, organizational, and financial capacity reviewed the application, then subsequently conducted an interview with the applicant to further assess applicant's capacity to carry out the plans as stated in the application.

Due Diligence. The evaluation teams considered any other available information relevant to each application.

Consensus Judgment. Members of both evaluation teams reached a consensus in determining whether to recommend the application for approval or denial.

The duty of the Evaluation Team is to recommend approval or denial of each application based on its merits. The authority and responsibility to decide whether to approve or deny each application rests with the Commission.

Report Contents

This Recommendation Report includes the following:

Proposal Overview

Basic information about the proposed school as presented in the application.

Recommendation

An overall judgment regarding whether the proposal meets the criteria for approval.

Evaluation Summary

A summary analysis of the proposal based on four primary areas of plan development and the capacity of the applicant to execute the plan as presented:

- 1. Academic Plan
- 2. Organizational Plan
- 3. Financial Plan
- 4. Evidence of Capacity

Rating Characteristics

Rating	Characteristics
Meets the Standard	The response reflects a thorough understanding of key issues. It addresses the topic with specific and accurate information that shows thorough preparation; presents a clear, realistic picture of how the proposed school expects to operate; and inspires confidence in the applicant's capacity to carry out the plan effectively.
Does Not Meet the Standard	The response meets the criteria in some respects but has substantial gaps, lacks detail and/or requires additional information in one or more areas and does not reflect a thorough understanding of key issues. It does not provide enough accurate, specific information to show thorough preparation; fails to present a clear, realistic picture of how the school expects to operate; and does not inspire confidence in the applicant's capacity to carry out the plan effectively.

Evaluation Report

A report, attached as <u>Appendix A</u>, provides details on the Evaluation Team's assessment of the applicant's proposal when reviewed against the evaluation criteria.

Proposal Overview

Proposed School Name

IMAG Academy

Mission and Vision (as described by the applicant)

- Mission: "The founders of IMAG Academy believe that all children are curious, creative and capable of learning. IMAG Academy will be a school with high social and academic expectations regardless of students' socioeconomic background, educational needs or English language challenges. IMAG Academy's mission is to provide a small, family-like environment to prepare mindful citizens through engaging our students in community centered concerns and projects. We focus on creating a continuum of experiences, in and outside of school, where the strengths and potential of the individual, family and community can flourish."
- Vision: "Our vision is to become a community resource raising generations of innovative, mindful, accepting, and giving (IMAG) citizens grounded in their knowledge and capabilities to create and sustain ethnically diverse, successful, and peace-filled communities."

Geographic Location (as described by the applicant)

"IMAG Academy will be located within the boundaries of the city of Waipahu. It is surrounded by the cities of Kapolei, Ewa, Ewa Beach, Pearl City, and Mililani, known as the central leeward area. The area has over 40,000 of the 180,000+ students within the public school system spread across some of the largest campuses within all school levels."

Anticipated Student Population (as described by the applicant)

"The socioeconomic demographics of the Waipahu area highlights a high percentage of the students qualifying for the free and reduced lunch program and higher than our state average will be considered English Language Learners. At least 50% of the students will have scored below the state's targets on Hawaii state summative tests in the year before they enroll at IMAG Academy.

The majority of our students will be Filipino (60+%) with several other culturally diverse ethnic groups represented, such as Native Hawaiian, Micronesian, and Samoan. In all groups, family and friends can play a critical role in their level of academic success. School pride and a sense of belonging are important; therefore a positive school culture that provides a safe and nurturing social and learning environment for all students is essential."

Contribution to Public Education System (as described by the applicant)

"The two Priority Needs of the Commission are to provide more educational capacity in areas where over-crowding exists or schools are at capacity (#1) and to improve academic outcomes where schools are not performing (#2). Due to our educational model and resulting design, we believe we can offer the central leeward area assistance to both priorities and families an option that does not exist today. Our community-centered project focused instructional strategy will offer experiences for all types of learners and will help provide an environment where students will be able to transfer and adapt their knowledge and skills learned in the classroom to solving real concerns of real businesses. It will provide the essential ingredient to student motivation, engagement, and learning; real world connections."

	Number of Students											
Grade Level	Year 1 Year 2			Year 3		Year 4		Year 5		Capacity		
	20	20	202	21	202	22	202	23	202	24		25
Brick & Mortar/ Blended vs. Virtual	B&M/ Blended	Virtual	B&M/ Blended	Virtual	B&M/ Blended	Virtual	B&M/ Blended	Virtual	B&M/ Blended	Virtual	B&M/ Blended	Virtual
К	25		25		25		25		25		25	
1	25		25		25		25		25		25	
2	25		25		25		25		25		25	
3	25		25		25		25		25		25	
4	25		25		25		25		25		25	
5	25		25		25		25		25		25	
6	25		50		50		50		50		50	
7	25		50		50		50		50		50	
8			50		50		50		50		50	
9					75		75		75		75	
10							75		75		75	
11									75		75	
12											75	
Subtotals	200	0	300	0	375	0	450	0	525	0	600	0
Totals	200		300		375		450		525		600	

Enrollment Summary (as described by the applicant)

Executive Summary

IMAG Academy

Recommendation

Deny

Summary Analysis

It is recommended that the application for IMAG Academy be denied since the applicant did not meet the standard for approval in all four core areas of the application. The applicant failed to satisfy the criteria in the academic plan, organizational plan, financial plan, and applicant capacity sections.

The academic plan does not meet the standard for approval, and as described in the application is tentative at best. The applicant has stated that academic goals and targets, student assessment tools, plans for assessing and meeting student needs, and plans for professional development will require additional research or will need to be revisited and finalized during the start-up period.

The organizational plan does not meet the standard for approval. There are various concerns regarding the organizational plan relating to the training for the school governing board, the capacity of the nonprofit board, plans for food service and facilities, agreement with the service providers, and the failure of parts of the organizational plan to align to the Financial Plan.

The financial plan does not meet the standard since the applicant did not provide a complete, realistic, and viable start-up plan and three year operating budget. Exclusions within the budget, including a blank start-up worksheet, in addition to incomplete costs that were listed throughout, render the Financial plan unreliable and unsound.

The applicant's capacity did not meet the standard because it did not demonstrate that it has the academic, financial, and organizational capacity to launch a successful high quality charter school. Of concern is that the proposed school principal exhibits undemonstrated capacity and ability since her resume does not indicate that the she has the range of experience and skills necessary to implement curriculum and develop the educational program while attempting to open and lead a new charter school.

Summary of Section Ratings

Opening and maintaining a successful, high-performing charter school depends on having a complete, coherent plan and identifying highly capable individuals to execute that plan. It is not an endeavor for which strengths in some areas can compensate for material weakness in others.

Therefore, in order to receive a recommendation for approval, the application must receive a "Meets the Standard" rating in all areas.

Academic Plan Does not meet the standard

Organizational Plan Does not meet the standard Financial Plan Does not meet the standard

Evidence of Capacity Does not meet the standard

Academic Plan

IMAG Academy

Rating

Does not meet the standard for approval

This section of the application contains eight sub-sections. IMAG Academy's application received ratings for six of the eight sub-sections:

Section II. Academic Plan - Sub-sections	Rating
A. Academic Plan Overview, Academic Philosophy, and Student Population	This section is not separately rated by the evaluators. However, a strong Academic Plan will demonstrate consistent alignment with the Academic Plan Overview, Academic Philosophy, and Student Population.
B. Curriculum and Instructional Design	XDoes not meet the standard for approval
C. Special Populations and At-Risk Students	X Does not meet the standard for approval
D. School Culture	Meets the standard for approval
E. Professional Culture and Staffing	XDoes not meet the standard for approval
F. School Calendar and Schedule	XDoes not meet the standard for approval
G. Supplemental Programs	XDoes not meet the standard for approval
H. Conversion Charter School Additional Academic Information	Not applicable

Analysis

Because IMAG Academy's application was found to meet the standard for approval for only one of the six of rated sub-sections, **the Academic Plan does not meet the standard for approval**.

As described in the Commission's 2018 Request for Proposals for new charter schools, "[t]he Narrative Proposal is the formal application to the Commission and is a comprehensive description of the proposed school's academic, organizational, and financial plans;" however, the Academic Plan described in IMAG's application is largely tentative. This is illustrated by the lack of detail in the application (described further in Appendix A) and was confirmed by the Applicant in the clarification interview, during which they described all of the following components of the application as either requiring additional research or needing to be revisited and finalized during the start-up period:

- Academic goals and targets
- Selected student assessment tools
- Plan for assessing and meeting the needs of students

• Plan for teacher induction and professional development

Although the Applicant has clearly invested a significant amount of time and energy in the development of the Academic Plan, they were unable to clarify many essential elements, specifically:

- the definitions and related data sources for the identified academic goals and targets,
- how identified assessments would accurately measure student progress towards the identified goals and targets,
- how the school would identify and deliver the appropriate supports and services to children in early grades, in particular kindergarteners, who would arrive on campus with no prior school record, and
- how, given budget constraints and the requirements of collectively bargained agreements, the school would be able to provide adequate professional development on the 13 types of instructional materials, four assessment tools, eight sets of standards, and five frameworks/ strategies related to the school's educational model that, as described in the application, are essential for all faculty and staff to be familiar with in order to successfully implement the Academic Plan.

Also of concern was the fact that several components of the plan are based on outdated materials, including both the school administrator and teacher evaluation plans and one of the student assessment tools. In the clarification interview, the Applicant confirmed that this is due to the fact that they did not double-check that all of the content of the Academic Plan was current prior to submitting the application. While it is reasonable for a repeat applicant like IMAG Academy to reuse or modify content from previous applications, it is concerning that the Applicant would not take steps to verify that the full content of the application was still valid, relevant, and accurate.

The Evaluation Team commends the Applicant for their willingness to make a difference for keiki and their tremendous perseverance in their quest to launch a charter school in Hawaii; however, whether due to a lack of familiarity with the academic subject matter or insufficient planning, the Academic Plan does not appear to be implementable as described in the application. This, combined with the fact that the Applicant had difficulty articulating its plan during the clarification interview and was unable to demonstrate a basic understanding of a sound academic program, prevents the Evaluation Team from being able to assess the viability and anticipated efficacy of the Academic Plan, and indicates that the plan has not met the standard for approval.

Organizational Plan

IMAG Academy

Rating

Does not meet the standard for approval

This section of the application contains eight sub-sections. IMAG Academy's application received ratings for seven of the eight sub-sections:

Sec	tion III. Organizational Plan - Sub-sections	Rating
Α.	Governance	≭ Does not meet the standard for approval
В.	Academic, Financial, and Organizational Performance Management	XDoes not meet the standard for approval
C.	Ongoing Operations	≭ Does not meet the standard for approval
D.	Student Recruitment, Admission and Enrollment	X Does not meet the standard for approval
E.	Geographic Location and Facilities	≭ Does not meet the standard for approval
F.	Start-Up Period	✓Meets the standard for approval
G.	Conversion Charter School Additional Organizational Information	Not applicable
н.	Third Party Service Providers	XDoes not meet the standard for approval

Analysis

Because IMAG Academy's application was found to meet the standard for approval for only one of the seven rated sub-sections, **the Organizational Plan does not meet the standard for approval.** Specific areas of concern include:

- the plan does not present a clear, realistic picture of training for the school's governing board to continue as a high-functioning board;
- there is a concern for the capacity of the nonprofit board to effectively support the school;
- the Applicant's plans for food service and facilities do not inspire confidence;
- the proposed school's agreements and relationship with its Service Provider are undetermined; and
- sections in the Organizational Plan fail to align with the school's Financial Plan.

Concerns Related to Governance

Undeveloped plans for governing board training

IMAG Academy's current governing board members appear to represent a range of skill sets. The board has also provided a detailed plan to recruit new members. However, the applicant does not have detailed plans for training its board members. For example, for the board training that will happen during the start-up period, it is not clear who will deliver the training and appears the board may develop its own, rather than utilizing an organization experienced in governing board training. There is concern for whether training will be relevant, deep, and foster a high-functioning charter school board.

Further magnifying the concern, the Applicant does not describe orientation, on-going training, or member development, after the start-up period. As the Applicant intends that the Board Development Committee will determine this plan in the future, is unknown what governing board training will consist of, including the topics that would be addressed, and whether the training will be developed by the governing board itself, Ho'okako'o, or experienced trainers. Without a clear plan, the capacity of the future governing board, as early as Year 1, is unknown. A well-trained decision-making board should always be in place at a school but is especially important during this fragile stage in a school's life-cycle.

Nonprofit compliance with State Ethics Code and capacity to support the school

The current membership of the nonprofit board is not in compliance with the State Ethics Code, as there are only three members and two of those are current members of the governing board. Although the Applicant states the "board membership will be re-aligned to ensure no conflict of interest will take place..." the Applicant does not provide a plan or explain how this will be done.

Further complicating the matter, there is a lack of confidence in the nonprofit board's capacity to fulfill the role of the nonprofit. For example, the applicant states the nonprofit "will continue to recruit those with experience and capacity" however, the simple statement lacks detail and the applicant does not show a clear and realistic picture of a comprehensive recruitment plan; there is a concern whether the nonprofit board would recruit individuals possessing the necessary experience and capacity.

Also, the intended roles of the current nonprofit members: Financial Management, Policy Development and Governance, Strategic Planning and Events Management, do not appear relevant to the means of supports that the nonprofit states it intends to provide IMAG Academy: "school funds development, fundraising, grant writing, fiscal sponsorship/agency and strategic visioning assistance". There is a concern over the misalignment between roles and supports and whether the nonprofit has the capacity for the activities, such as fundraising, funds development and grant writing. Subsequently there is a concern for any budget items reliant on fundraising, such as the proposed school's food service.

Concerns Related to Ongoing Operations

The plan for food service is undetermined and the Applicant did not provide a reliable contingency plan despite the apparent student need. The Applicant states IMAG Academy anticipates that more than 55% of its students will qualify for the Free or Reduced Lunch program, thus the proposed school plans to offer lunch and a snack starting in Year 1. IMAG Academy estimates it needs \$115,000 for the first year of food service. In the clarification interview, the Applicant reported that no food service expenses are reflected in the school's Year 1, Year 2, or Year 3 budget, and these expenses need to be funded by fundraising activities. IMAG Academy has no contingency plan if it cannot raise the funds necessary to cover the upfront costs of providing the meals. The Applicant explained that although food would still be made available, students would need to purchase the meals, even students who qualify for the Free and Reduced Lunch program. Given the lack of confidence in the nonprofit's capacity as explained

above, there is a concern that the estimated 55% of the students who qualify for Free and Reduced Lunches, would have to purchase full price meals. As it could affect a student's ability to attend the school, families need to know upfront whether or not meals will be subsidized; it's not fair to say this is the plan but later take it away. In consideration of the anticipated student population, whether or not IMAG Academy will provide a Free and Reduced Lunch program needs to have been determined, not a plan in progress. In addition to these concerns, as the food services costs are missing from the Year 1, Year 2, and Year 3 budget, the larger financial implications are explained in the Financial Plan Section.

Concerns Related to Facilities

The facility plan fails to present a clear, realistic picture of how the school expects to operate; there are concerns regarding square footage, renovations, and future growth.

Attachment Q presents general square footage needs of the school for Year 1 through 5, but there is a concern that projections may not be realistic because they are not well-supported assumptions. In the narrative of the Financial Plan, the applicant provided a figure of 5,350 square feet for a facility to determine Year 1 expense assumptions. With a projected enrollment figure of 200 students, a facility of this size amounts to approximately 27 square feet per person.

To provide a point of reference, a report from the Department of Education's Facilities Development Branch, dated July 19, 2016, reported that DOE guidelines provide for an average of 107 to 143 square ft. per student of the schools. The report further states that the national average for space per student is 104 to 161 square feet per student. IMAG Academy's projection of approximately 27 square feet is nearly 4 times less space per student.

During the Clarification Interview, the Applicant reported that they measured a classroom in Waipahu High School and used that to determine the square footage needs for its classrooms; it is not known what the square footage figures for "common areas" and "school office" are based on. The Applicant does not provide a rationale for considering facilities that result in square footage per student amounts that are significantly lower than Hawaii public school guidelines. As such there are concerns whether the school's facilities plan supports and aligns with the school's academic plan, fosters good learning environments, and ultimately are safe.

Without general assessments of the specific buildings listed in Attachment Q, there is no confidence in the estimations used for the facility renovation and financing plans. Several buildings are represented in Attachment Q as possible school sites, but not the square footage and general assessments of what needs to be done to bring each possible facility into compliance for use as a school. In the clarification interview, the Applicant reported the renovation costs are based on IMAG Academy finding ready-to-use office space that doesn't require expensive fixes to be converted to a school, and on research conducted of other buildings for previous charter school application cycles. For this reason, they provided a conservative budget based on "minimum renovations and permitting concerns". Further complicating the matter, the renovation activities in the Financial Management Plan (page 16 of Attachment Q), happen in May-June 2020 (item 16), but the renovation activities in the Facility Acquisition Project Plan (page 11 of Attachment Q) start in December 2019 (item 27), 6 months earlier. There is a concern regarding the alignment between readiness, or availability, of finances when renovations begin.

The facilities plan does not include how the school will accommodate any square footage increases necessary to meet the Enrollment Plan, which adds more students every year. In the clarification

interview the applicant provided simply that the criteria for selecting a facility is to find a building that will accommodate the growth. Similar to the renovation plan, the Applicant is relying on assumptions that a large enough building, that fits into their budget, will be available. There is a concern whether these are well-supported assumptions for finding a facility. Without clearly reliable supporting evidence these assumptions are not sound plans for growth.

Concerns Related to Service Providers

The Applicant has chosen to work with a service provider, Ho'okako'o Corporation, that has shown success working with three public conversion charter schools in Hawaii. IMAG Academy would be the first start-up public charter school Ho'okako'o Corporation would work with. Although a draft Service Agreement was provided that shows the terms and fee schedule, during the Capacity Interview there was uncertainty, between the proposed school and the Service Provider, on the fee that would be charged to the proposed school. The difference was approximately \$10,000.00. Because the difference in the fee that will be charged has larger financial implications, this will be explained in the Financial Plan Section. Organizationally, the inability to agree upon a service agreement with its primary, and initial, contractor in the application phase is evidence that the Applicant Team does not have the capacity to implement its policies and procedures for selecting vendors or contractors effectively.

Finally, regarding the relationship between Ho'okako'o Corporation and IMAG Academy, the Applicant does not provide the methods the proposed school governing board will use to review and evaluate the Service Provider's progress, or an explanation of whether there will be an external evaluator to assess the Service Provider's, or the procedures, standards, or conditions, for interventions. The Applicant simply states that Ho'okako'o will be assessed annually and lists the assessment areas.

Financial Plan

Rating

Does not meet the standard for approval

This section of the application contains two sub-sections. IMAG Academy's application received ratings for both of the sub-sections:

Se	ction IV. Financial Plan - Sub-sections	Rating
Α.	Financial Oversight and Management	✗Does not meet the standard for approval
В.	Operating Budget	X Does not meet the standard for approval

Analysis

Because IMAG Academy's application was not found to meet the standard for approval for the both rated sub-sections, **the Financial Plan does not meet the standard for approval.** Specifically, the Applicant did not provide a complete, realistic, and viable start-up plan and three-year operating budget. Exclusions and incomplete costs render the Financial Plan and the application as a whole unreliable and unsound. Incomplete or excluded items include, but are not limited to:

- Food costs for Years 1-3 (discussed in more detail below);
- Instructional materials, software, and assessments;
- Professional development on the numerous standards, frameworks, and approaches that comprise the school's educational model;
- Costs to cover teacher professional development/work days that exceed collective bargaining requirements;
- Staffing (discussed in more detail below); and
- Facility renovation and retrofitting costs.

In addition, the Applicant did not complete the Financial Plan workbook in accordance with the requirements of the Request for Proposal; the applicant failed to submit a start-up period budget. Instead, a blank spreadsheet was submitted and start-up year budget information was provided in the narrative proposal. While the Evaluation Team was able to review the narrative for budget information, the Applicant's inability to complete the Financial Plan section as required raises concerns that further financial information is incomplete or not included and it raises concerns pertaining to the capacity of the applicant governing board, which allowed the application to be submitted with this glaring omission.

The Evaluation Team would like to note that the described system of financial oversight by the school governing board and the division of operational duties and responsibilities between the school administration, specifically the school director, and its financial service provider, Ho'okako'o Corporation, sets the foundation for sound systems, policies, and processes for financial planning, accounting, purchasing, and payroll. Though financial policies and internal controls would need to be finalized and adopted by the school governing board, the Applicant has clearly delineated the roles and

responsibilities of the governing board, school administration and its financial service provider, Ho'okako'o Corporation.

Fiscal Concerns Related to Year 1 Budget

However, as previously mentioned, the Applicant does not meet the standard for this section due to the numerous inconsistencies and exclusions in the budget provided in the Financial Plan. The Applicant projects that the school will end Year 1 with approximately \$31,500, which equates to less than 8 days of cash on hand. Under the Financial Performance Framework of the State Public Charter School Contract, this would result in a classification of significant risk, the most severe level of risk in the Financial Performance Framework. The Days Cash on Hand indicator evaluates whether a school maintains a sufficient cash balance to meet its cash obligations. The Framework classifies moderate risk as 30-50 days cash on hand. The school's projection of 8 days cash on hand increases the risk of financial insolvency, which under Hawaii state law, results in closure of the charter school.

Inaccurate or incomplete budget projections further erodes the viability of the Year 1 budget. As previously stated in the Organizational Plan, Ho'okako'o Corporation states that its fee is \$65,000 as described in the draft service agreement provided in the application, while the Applicant states that the fee is \$55,000 as stated in the annual budgets provided in the application. Though the difference of \$10,000 may initially appear inconsequential, this difference would have a severe impact in the applicant's Year 1 budget. Should the fee for Ho'okako'o Corporation be \$65,000, this would lower the end of year balance to \$21,500 and about 5 days cash-on-hand, which further exacerbates an already precarious financial situation.

Fiscal Concerns Related to Incomplete/Excluded Costs

In addition to the Year 1 budget concerns, the exclusion of expenses further erodes the viability of the budget and Financial Plan as a whole. For example, the Applicant did not include food service costs in the operating budget despite the Applicant's stated intention to serve lunch and a snack in Year 1 of operations and breakfast by Year 4. This is driven by the fact that the school anticipates more than 55% of its students will qualify for free or reduced lunch. As described in the application, the Applicant did not expect to have a certified kitchen in its facility, so contracted vendors would provide and deliver meals. The application further provides a projected cost of \$115,000 for food service for Year 1. However, as previously stated, the annual budgets for Years 1 through 3 do not have any food costs, though it is stated that grants, donations, and fundraising may be needed to cover the Year 1 cost. A review of the Applicant's contingency plans did not find any mention of canceling food service if enrollment projections are not met.

In the clarification interview, the Applicant stated that food costs were not included in the budgets as the school would need to apply for and be approved to participate in the National School Lunch Program (NSLP). Applicants were not allowed to provide unsubstantiated federal funding in the budget; however, the federal reimbursement does not cover the full costs of school meals. Even if approved for the NSLP, the Applicant will need to budget for food costs on some level.

As food service is a costly expense for public schools, the absence of any food costs raises serious questions and doubts of the Applicant's ability to provide this service. With more than half the projected student population qualifying for free or reduced lunch, the absence of food service would have a negative impact on students. On the other hand, should the school provide food service, the budget provided would be inaccurate and unreliable, resulting in concerns and doubts of the school's ability to implement other facets of its academic and organizational plan.

Other cost estimates that appear incomplete or are excluded include staffing costs are budgeted at \$53,000 for each teacher, in each year of the budget). This potentially limits the school to hiring teachers whose qualifications or experience are at the lower levels. There are three teacher Classes that include salary levels around a \$53,000 salary level or lower in the 2020-2021 school year salary schedule. However only two of these classes would include licensed teachers, the other class includes teachers that are unlicensed, have not completed a State Approved Teacher Education Program, and would only be eligible for an emergency hire permit.

Evidence of Capacity

IMAG Academy

Rating

Does not meet the standard for approval

This section of the application contains three sub-sections. IMAG Academy's application received ratings for all three of the sub-sections:

Section V. Applicant Capacity - Sub-sections	Rating
A. Academic Plan Capacity	$oldsymbol{X}$ Does not meet the standard for approval
B. Organizational Plan Capacity	$oldsymbol{X}$ Does not meet the standard for approval
C. Financial Plan Capacity	$oldsymbol{X}$ Does not meet the standard for approval

Analysis

The applicant does not demonstrate the capacity to open and manage a high quality charter school since the applicant does not meet the standard with regard to its academic, organizational and financial management capacity.

The applicant does not have the academic capacity necessary to run a high quality charter school. Although the school will be supported by various advisors, the day to day operational aspect of running a charter school, as well as academic related start-up activities will rest with the proposed school director. The position description for school director did not require or emphasize school administration or leadership. Instead, the job description set qualifications for the position that emphasized Organizational Management, Project Management, Strategic Planning, and mid-management supervisory experience over school administrative experience, teaching experience, and developing and delivering school programs. The proposed school principal exhibits undemonstrated capacity and ability since her resume does not indicate that she has the range of experience and skills necessary to launch and lead a high quality charter school in addition to implementing curriculum and developing the educational program.

The applicant does not have organizational capacity since the average classroom size of the school may not be sufficient to deliver instruction in the methods that would be chosen for the school.

The applicant does not have financial capacity since the governing board treasurer and another governing board member with fundraising experience are listed as the members that will carry out the financial plan. The governing board treasurer of the proposed school is knowledgeable about financial

management. However, this experience of the treasurer may need to be supplemented with a deeper understanding of the financial management aspects of a school.

Evaluator Biographies

Martha Evans

Ms. Evans has over 40 years of experience in education having served as a school administrator, curriculum coordinator, and teacher in both public and private schools. She served as a school administrator at Lāna'i High and Elementary School, Saint Louis School and McKinley Community School for Adults. Ms. Evans taught at Lāna'i High and Elementary School, Holy Family School and Mokapu Elementary. She earned both a Bachelor's Degree in Elementary Education and Master's Degree in Elementary Education/Curriculum and Instruction from the University of Hawaii Manoa, a Certificate in Reading Recovery from the University of California San Bernardino, and a Certificate in Educational Administration from the University of Hawaii Manoa.

Patricia Hamamoto

Ms. Hamamoto is the former Superintendent of the Hawaii Department of Education. She has over 40 years of experience in education having served as an administrator at the state and school levels, and as a teacher. She served as a school administrator at Maui High School, Nanakuli High and Intermediate School, Pearl City Highlands Elementary, Princess Miriam Likelike Elementary School, and President William McKinley High School. She has taught at Highlands Intermediate School, Ilima Intermediate School, Pearl City High School, McKinley Community School for Adults, Waipahu Community School for Adults, and Kaimuki Community School for Adults. Ms. Hamamoto has a Bachelor of Arts, Fifth Year Teaching Certificate from Long Beach State College, and a Master of Education from the University of Hawaii.

Jennifer Higaki

Ms. Higaki is the Commission's Academic Performance and Data Systems Manager. She has been involved in education in Hawaii since 2003, working in school-level and state-level positions in the Hawaii Department of Education and at the Hawaii Association of Independent Schools. She has a Bachelor of Arts in Art History and Italian Studies from Wellesley College and a Master of Science in Comparative and International Education from the University of Oxford.

Randolph Moore

Mr. Moore is a Vice Chair of the University of Hawaii Board of Regents. He also currently serves as Board Chair and Director of the Hawaii Housing Development Corporation and as a Director of Grove Farm Company, Inc. He also chairs the advisory board of the Hawaii Budget & Policy Center. Mr. Moore is a retired business executive having a career that spanned 35 years which included serving as President of Oceanic Properties, President of Molokai Ranch, and Chief Executive Officer of Kaneohe Ranch. Following his retirement from Kaneohe Ranch, Mr. Moore taught mathematics at Central Middle School, and then became the Assistant Superintendent at the Hawaii Department of Education, Office of School Facilities and Support Services. Mr. Moore retired from the Hawaii Department of Education in 2012. He holds a Bachelor of Arts in mathematics from Swarthmore College, a Master in Business Administration from Stanford University, and completed post-baccalaureate teacher training at Chaminade University.

John Rizzo

Dr. Rizzo has over 30 years of leadership service in the role of Superintendent of Schools, Independent Head of School and as Principal of Public Schools in Massachusetts. He also served as an Adjunct

Professor of Graduate and Undergraduate Education for 17 years at a Massachusetts State University, and has served as a High School Head Football and Lacrosse Coach. While in Hawaii, Dr. Rizzo served as the Founding Head of School at Maui Preparatory Academy and also Head of School at St. Theresa School. Dr. Rizzo earned a Bachelor of Science in History and Education from Springfield College, his Master's Degree in Educational Leadership at Westfield State University, and his Doctorate in Teacher Education and School Improvement with a concentration in Supervision and Evaluation at The University of Massachusetts.

Sylvia Silva

Ms. Silva is the Commission's Organizational Performance Officer. Prior to working at the Commission she worked for its predecessor agency, the Charter School Review Panel. Before her work in charter school authorizing she had seven years of experience in operations at the school level which included school preopening/start-up phase systems and policy development, registrar functions, and school bookkeeping. She holds a Bachelor of Arts in Business Administration from Chaminade University of Honolulu.

Danny Vasconcellos

Mr. Vasconcellos is the Commission's Finance and Control Manager. He previously worked at the State Office of the Auditor as an Analyst where he worked on or lead projects that required him to identify internal control weaknesses and analyze the effectiveness of state agencies. While at the Office of the Auditor, he worked on the audit of Hawaii's charter schools and a study of the Hawaii Teacher Standards Board. He also served as a researcher for the Hawaii State Legislature's House Finance Committee and has extensive knowledge of Hawaii's legislative process and funding. He holds a Master of Public Administration from the University of Hawaii at Manoa.

Appendix A 2018 Evaluation Report for IMAG Academy

Evaluation Criteria Overview

The Application Requirements and Criteria are the essential tools for the Evaluation Team, used in both their individual and team assessments of each application. The Evaluation Team presents both ratings on a scale and narrative analysis of each section of the application as compared to the Application Requirements and Criteria. Throughout the application evaluation process, evaluators will update their analysis to include additional information (due diligence, clarification interview, capacity interview, etc.) as it is presented. Within each section and subsection, specific criteria define the expectations for a response that "Meets the Standard." In addition to meeting the criteria that are specific to that section, each part of the application should align with the other sections of the application. In general, the following definitions guide evaluator ratings:

Rating	Characteristics
Meets the Standard	The response reflects a thorough understanding of key issues. It addresses the topic with specific and accurate information that shows thorough preparation; presents a clear, realistic picture of how the proposed school expects to operate; and inspires confidence in the applicant's capacity to carry out the plan effectively.
Does Not Meet the Standard	The response meets the criteria in some respects but has substantial gaps, lacks detail and/or requires additional information in one or more areas and does not reflect a thorough understanding of key issues. It does not provide enough accurate, specific information to show thorough preparation; fails to present a clear, realistic picture of how the school expects to operate; and does not inspire confidence in the applicant's capacity to carry out the plan effectively.

Opening a successful, high-performing charter school depends on having a complete, coherent plan. It is not an endeavor for which strength in one area can compensate for material weakness in another. Therefore, in order to receive a recommendation for approval, the application must demonstrate evidence of capacity to implement the proposed plan, meet the criteria for all main sections of the application (Academic Plan, Organizational Plan, Financial Plan, and Applicant Capacity), and present an overall proposal that is likely to result in the successful opening of a *high-quality charter school*, as defined in the Request for Proposals ("RFP").

Note on Evidence of Capacity

A high-quality application demonstrates evidence that the applicant has the capacity needed in all key areas in order to open and operate a *high-quality charter school* that improves academic outcomes for students. This evidence includes:

Individual and collective qualifications (which may include, but is not limited to, documented and
relevant credentials and experience reflected in the resumes of all members and an
understanding, as demonstrated by the application responses, of challenges, issues, and
requirements associated with running a *high-quality charter school*, as defined in the RFP) to
implement the Academic Plan successfully, including sufficient capacity in areas such as school
leadership, administration, and governance; curriculum, instruction, and assessment;
performance management; and parent or guardian and community engagement.

- Individual and collective qualifications for implementing the Organizational Plan successfully, including sufficient capacity in areas such as staffing, professional development, performance management, general operations, and facilities acquisition, development, and management.
- Individual and collective qualifications for implementing the Financial Plan successfully, including sufficient capacity in areas such as financial management, fundraising and development, accounting, and internal controls.

Evaluation Report

I. School Overview

The School Overview section is not separately rated by evaluators. However, the Evaluation Team will consider each section of the application to assess its alignment with the statements in the School Overview section, as it provides the foundation for the entire application.

II. Academic Plan

A strong Academic Plan is coherent overall and aligned internally with the proposed school's mission and vision; Organizational Plan; and Financial Plan.

Section II.A: Academic Plan Overview, Academic Philosophy, and Student Population

This section is not separately rated by the evaluators. However, a strong Academic Plan will demonstrate consistent alignment with the Academic Plan Overview, Academic Philosophy, and Student Population.

Section II.B: Curriculum and Instructional Design				
Meets the Standard	Does Not Meet the Standard			
Rationale: The application does not meet the standard for the majority of the criteria in this section (four out of seven criteria; Criterion II.B.8 does not apply).				
Criterion II.B.1 A clear description of course outcomes for each course at each grade level that if achieved at the high school level, will ensure a student graduates with the competencies, skills and content knowledge to be successful in any post-secondary education opportunities he or she may seek to pursue, and if achieved at the elementary or middle school level, will situate the student to achieve academic success at the next level of his or her academic career.				
Meets the Standard	Does Not Meet the Standard			
 Student outcomes are listed in Attachment Q, even though this attachment is intended to focus on the start-up project management plan, not the Academic Plan. Because the outcomes have been inappropriately included in Attachment Q, the content has been disregarded. 				
Criterion II.B.2				
 A clear description of the rigorous academic standards that will be used at the proposed school including: A rationale for inclusion each set of standards that the proposed school plans to adopt that demonstrates an understanding of how each set of standards will contribute to the success of student learning under the Academic Plan; and A clear articulation of how the standards based curriculum will be aligned to standards-based instruction, standards-aligned formative and summative assessments and standards-based grading and 				
reporting of student progress.				
Meets the Standard	Does Not Meet the Standard			
Rationale:				

• The application articulates how curriculum will be aligned with instruction, formative and summative assessments, and reporting on student progress, but no mention of grading.

Criterion II.B.3

A reasonable and sound timeline and description of how instructional materials will be developed or selected and a list of individuals that will be involved in the development or selection process. If the instructional materials have been selected, a description and explanation that clearly demonstrates how the materials support the Academic Plan. If the proposed Academic Plan includes a *virtual* or *blended learning program*, include a clear description of the virtual learning curriculum program(s) and a reasonable rationale for the selection of the curriculum program(s).

Meets the Standard	Does Not Meet the Standard
Rationale:	

Criterion II.B.4

A clear list of academic goals and targets and a description of how the proposed school assesses the progress of individual students, student cohorts, and the school as a whole on the identified goals and targets. The description must clearly explain how the identified assessments will accurately measure progress toward the identified goals and targets.

Meets the Standard	☑Does Not Meet the Standard
Patianala	

Rationale:

In the clarification interview, the Applicant Team confirmed that none of the academic goals and targets
identified in the application are final -- they are either tentative or based on data whose availability still
needs to be confirmed.

The Applicant Team was also unable to articulate the rationale behind selecting goals and targets that use statewide assessment data, but follow a different calculation methodology than the DOE and Commission academic performance accountability frameworks (i.e., "average % of those meeting or exceeding" rather than proficiency rate), or a plan for how to obtain the necessary Waipahu Complex comparison data.

The Applicant Team stated that the academic goals and targets will be revisited and finalized during the start-up period.

• In the application, it is unclear which assessment tools will be used to generate the data required in order to assess progress toward the stated academic goals and targets (i.e., MAP Growth, Reading Fluency, Skills, or the full suite) and there is no clear definition of the targets. In the clarification interview, the Applicant Team was unable to provide clarification -- they could not identify the exact assessment tools that would be used or define the stated targets.

Criterion II.B.5

A clear and comprehensive description for how instructional leaders and teachers will use student data to administer, collect, and analyze the results of diagnostic, formative, benchmark/interim, and summative assessments to inform programmatic and instructional planning decisions and make adjustments to curricula, professional development, and other school components. The description must clearly explain the roles and responsibilities of the instructional leadership team in overseeing teachers' progress toward helping students meet their identified goals and targets and clearly describe the formalized process and supports that will enable teachers to reflect on student progress and adjust their instruction accordingly.

Meets the Standard	☑ Does Not Meet the Standard
Rationale:	

 The Assessment and Collaboration Calendar (Attachment I) describes how instructional leaders and teachers will use student data to administer, collect, and analyze the results of diagnostic, formative, benchmark/interim, and summative assessments to inform programmatic and instructional planning decisions and make adjustments to curricula, but no mention of professional development. 		
 The application states who comprises the instructional leadership team ("Our instructional leadership team is made up of our school director, academic coach, and teachers."), but not the roles and responsibilities of the team in overseeing teachers' progress toward helping students meet their identified goals and targets. 		
Criterion II.B.6 A clear description of the instructional strategies that the proposed school will use that adequately explains how these strategies support the mission, vision, and academic philosophy of the proposed school and are well- suited to the anticipated student population. The description must also include the interventions and modifications that will be made to instructional strategies if students are not meeting identified goals and targets. If the proposed school's Academic Plan contains a <i>virtual</i> or <i>blended learning program</i> , the description must adequately explain how the proposed instructional strategies will work with the virtual learning components to result in a coherent instructional program.		
Meets the Standard Rationale:	Does Not Meet the Standard	
Criterion II.B.7		
 <u>Graduation Requirements</u>. a. A clear description of the course and credit requirements for graduation, including a description of how GPA will be calculated, that meets BOE's graduation requirements. 		
b. If graduation requirements for the proposed school will differ in any way from BOE Policy 4540, an explanation of how they will differ (including exceeding BOE graduation requirements), including compelling reasons and justification for the differences, and a reasonable and sound plan for adjusting graduation requirements (including any necessary adjustments to other components of the Academic Plan) in the event the BOE does not grant a waiver from its policy.		
Meets the Standard	Does Not Meet the Standard	
Rationale:		
Criterion II.B.8 (sub-criteria a through cc) <u>Virtual and Blended Learning</u> . If the proposed school's defined in the RFP:	plan contains a virtual or blended learning program, as	
 A clear overview of any virtual or blended learning program that is appropriate for the anticipated student population and clearly demonstrates that all students receive adequate support, including: State the number of anticipated students that will access either a blended model, and/or a virtual program at your proposed school. 		
 For students accessing the virtual program, indicate the number of hours per month the student will access the virtual or distance learning program outside of your school's site. 		
 A description of the general organization of the virtual learning schedule (e.g., fixed daily schedule, modified schedule, open entry/open exit), including an adequate explanation of how schedules will be modified, if at all, for students that fail to meet learning goals; 		
iii. For <i>blended learning programs</i> , an explanation of whether and how the program enhances or supports classroom instruction;		

- iv. A description of the teacher's role, the role of any non-teacher faculty members (paraprofessionals, counselors, parent instructional coaches), the student's role and the parents' role in any virtual learning program.
- v. Describe what, if any, additional responsibilities will be required of teachers in the virtual environment (course development/design, research, website maintenance) and describe how the school will communicate these responsibilities to teachers. Describe how the school will provide professional development appropriate to the delivery method used.
- vi. A plan for orientation for prospective and enrolled students, their parents, and their instructional coaches on the course delivery model prior to the beginning of the school year.
- vii. A description of the degree of support provided to students using any *virtual learning* program (*e.g.*, little or no support, school based mentoring support, school or home mentoring support).
- viii. Describe whether a student enrolled in the virtual school can be enrolled in credit bearing instructional activities at another institution.
- ix. A description of the student to teacher ratio in the *virtual learning* program (*e.g.*, traditional classroom ratio, 2-3 times traditional classroom ratio, instructional helpdesk model).
- b. A video demonstration, as a URL to a video on a browser-viewable platform (like YouTube), of the proposed *virtual* or *blended learning program* curriculum that clearly portrays the student and teacher experience with the *virtual learning* curriculum, including both the student and teacher user interfaces.
- c. Describe whether students will be required to regularly or periodically attend your school facility. Specify such requirements and describe the facility.
- d. Describe how the school will ensure or facilitate student attendance at in-person school activities.
- e. An explanation of how the proposed school will define, monitor, verify, and report student attendance, student participation in a full course load, credit accrual, and course completion that provides sufficient evidence that all students will be accounted for and engaged in a complete and rigorous educational program.
- f. A description of the proposed school's virtual attendance policy.
- g. Describe the virtual and blended learning program's policies regarding truancy, absence, withdrawal, credit recovery, and dual enrollment.
- h. Describe the intervention the school will take when students are not logging in and/or completing coursework as required.
- i. A sound plan for administering and proctoring mandated assessments, including a reasonable budget that is reflected in the Financial Plan Workbook.
- j. Describe the plan and method for the administration of all required state assessments.
- k. A reasonable plan to uphold the academic integrity of the *virtual* or *blended learning program* that describes the systems and procedures for validating the authenticity of student work. Describe procedures to ensure the integrity and authenticity of student work product and assessment scores, including the use of an academic honesty and computer acceptable use policy. Describe the intervention to be used when students fail to provide authentic work product or assessment responses. Describe the role that parents will have in promoting accountability.
- I. Describe the data retention, security, acceptable use, electronic communication, and confidentiality polices.
- m. An adequate explanation of measures the proposed school will take to ensure student safety, both technologically and educationally, that are compliant with applicable federal privacy laws (FERPA, CIPPA, and COPPA).
- n. Describe how the school will provide for the health and safety of students in both online and offline activities.

- o. Describe how the school will administer required health screenings to students in virtual programs.
- p. An adequate explanation of how the proposed model ensures that there are minimal interruptions to learning, should technological challenges arise, including a description of the plan for technical support and troubleshooting for students, teachers, parents or guardians, and administrators. Describe the scope of technical support that will be provided, including where support staff will be located, and the hours (including weekends and holidays) and manner in which support will be accessible to students and school employees.
- q. Describe procedures to deliver instruction when equipment, software, or connectivity at any location is lost or impaired. Specify who will pay for internet connectivity, and address minimum bandwidth and a course of action for any areas of the state that do not have the minimum bandwidth.
- r. Describe data protection and recovery procedures in event of catastrophic system failure (including offsite system backup).
- s. Describe all technological equipment and services that the school will provide, including hardware, software, connectivity, and media storage devices, and property controls and equipment tagging that will be in place. Specify any equipment or technological support that students or families will be responsible for purchasing or obtaining.
- t. A clear description of the platform dependencies for the proposed curricular materials and instructional strategies and an adequate explanation of how the proposed technology selection supports those dependencies. (For example, the proposed curriculum runs a Microsoft Windows-based application, and therefore requires Windows-compatible laptops and tablets rather than iPads.)
- u. Describe how the virtual program will provide services to all enrolled students with exceptionalities, regardless of where the student resides.
- v. Describe the virtual program's procedures for Individual Education Plan (IEP) meetings, including determining where such meetings will occur.
- w. Describe how the virtual program will implement ADA and Rehabilitation Act standards for accessibility to web-based curricula.
- x. Indicate the nature, frequency, and location of all required in-person meetings between parents and school faculty/administration, such as parent-teacher conferences, parent-teacher meetings, field trips, etc.
- y. Indicate the nature and frequency of all optional opportunities for in-person meetings and interactions such as open houses and school community meetings.
- z. Describe the procedures for parents to contact virtual charter school faculty and administrators with concerns of any nature and the procedures and required timelines for prompt and helpful responsiveness to such communications.
- aa. Describe how the school will provide adequate, timely, and appropriate technical support to students, teachers, facilitators, and instructional coaches.
- bb. Describe whether training opportunities to parents and guardians will be available.
- cc. Describe how parents access student grades and understand student progress.

Not applicable.

Section II.C: Special Populations and At-Risk Students	
Meets the Standard Meets the Standard	
Rationale:	
The explication does not used the standard for the projective of the orthogic in this section (three out of four	

The application does not meet the standard for the majority of the criteria in this section (three out of four criteria).

Criterion II.C.1

An outline of the overall plan to serve *educationally disadvantaged students* and students with special needs that demonstrates an understanding of, and capacity to fulfill, state and federal obligations and requirements pertaining to *educationally disadvantaged students* and students with special needs, including but not limited to the following subgroups: students with IEPs or Section 504 plans; ELL students; students performing below

grade level; students identified as intellectually gifted; homeless students; and students at risk of academic failure or dropping out. The plan must identify any other special needs populations and at-risk subgroups that the proposed school expects to serve, whether through data related to a specifically targeted school or geographic area or more generalized analysis of the population to be served, and describe the evidence or data that was used to determine that the proposed school should anticipate serving the population.

□ Meets the Standard

Does Not Meet the Standard

Rationale:

The application does not describe the evidence or data used to determine whether the proposed school should anticipate serving any other special needs or at-risk subgroups.

Criterion II.C.2

For <u>each</u> of the aforementioned subgroups of students with special needs (and any other subgroups the applicant identifies), a comprehensive and compelling plan or explanation for:

- a. The percentage of the anticipated student population that will likely have special needs and how the evidence or data that was used to make this determination was derived;
- b. The curriculum, daily schedule, staffing plans, instructional strategies, and resources that will be designed to meet the diverse needs of all students;
- c. Methods for appropriate identification of potential students with special needs, how these methods will be funded, and how misidentification will be avoided;
- d. Specific instructional programs, practices, and strategies the proposed school will employ to do things like provide a continuum of services; ensure students' equitable access to general education curriculum; ensure academic success; and opportunities the proposed school will employ or provide to enhance students' abilities;
- e. Monitoring, assessing, and evaluating the progress and success of students with special needs, including plans for ensuring each student with special education needs attains IEP goals and for exiting ELL students from ELL services;
- f. For proposed schools that have a high school division, plans for promoting graduation;
- g. Plans to have qualified staff adequate for the anticipated special needs population, especially during the beginning of the first year; and
- h. If the proposed school's plan contains a *virtual* or *blended learning program*, a clear description of how the virtual component addresses students with special needs, which may include IEP meetings and modifications, as necessary, for transitioning to or from a fully or partially virtual learning program.

Meets the Standard	Does Not Meet the Standard	
Rationale:		
The application does not describe the evidence or data us	ed to determine whether the proposed school should	
anticipate serving any other special needs or at-risk subgr	oups.	
Criterion II.C.3		
A clear illustration of how the proposed curriculum and	Academic Plan will accommodate the academic needs of	
students performing below grade level and a clear descr	iption of the supports and instructional strategies	
beyond special education that will support underperform	ning students in meeting and exceeding standards.	
Meets the Standard	☑ Does Not Meet the Standard	
Rationale:		
• The application states that "IMAG identifies low-achieving students in the first two weeks of the academic		
year" and references the Assessment and Collaboration Schedule (Attachment I); however, according to		
this document, the identification process is based on a review and evaluation of "previous years		
this document, the identification process is based		
information," specifically, "SBA Results, EOC Grad		

to identify any alternate data sources or to articulate an alternate plan for kindergarteners; instead, they stated that this would be addressed during the start-up period.

Criterion II.C.4

A clear description of how the proposed school will identify students who would benefit from accelerated learning opportunities through its assessment of students' needs, a clear illustration of how the proposed curriculum will accommodate those performing above grade level, and a comprehensive description of the supports and instructional strategies that will ensure these students are challenged and able to access the level of rigor that aligns with students' individualized needs.

Meets the Standard	Does Not Meet the Standard
Rationale:	

Section II.D: School Culture		
Meets the Standard	Does Not Meet the Standard	
Rationale: The application meets the standard for the majority of the	Rationale: The application meets the standard for the majority of the criteria in this section (three out of four criteria).	
Criterion II.D.1		
A clear and coherent description of the shared beliefs, attitudes, traditions, and behaviors of the proposed school community, and a detailed plan describing how these shared beliefs, attitudes, customs, and behaviors will be developed and implemented and create a school culture that will promote high expectations and a positive academic and social environment that fosters intellectual, social, and emotional development for all students.		
Meets the Standard	Does Not Meet the Standard	
Rationale:		
Criterion II.D.2 A sound plan for developing a proposed school culture th students and how the proposed school will adequately id behavioral, and physical health needs of all students on a activities that the proposed school will engage in to create	entify, assess, monitor, and address the social, emotional, n ongoing basis. The plan should explain the types of	
Meets the Standard	Does Not Meet the Standard	
Rationale:		
Criterion II.D.3 A reasonable and sound plan for the school culture and staff that will intentionally expose students to post- secondary educational and career opportunities at all grade levels. The plan must identify the curricular or extracurricular programs that will provide students with access to college or career preparation and include research-based evidence that these programs increase educational aspirations for the anticipated student population.		
Meets the Standard	Does Not Meet the Standard	
Rationale:		
Criterion II.D.4 Student Discipline		

a. A clear description of the proposed school's philosophy on cultivating positive student behavior and a student discipline policy that provides for appropriate, effective strategies to support a safe, orderly school climate and fulfillment of academic goals, promoting a strong school culture while respecting student rights.

b. Legally sound policies for student discipline, suspension, dismissal, and crisis removal, including the proposed school's code of conduct and procedural due process for all students, including students afforded additional due process measures under IDEA.

c. Appropriate plan for including teachers, students, and parents or guardians in the development and/or modification of the proposed school's policies for discipline, suspension, dismissal, and crisis removal.

d. Legally sound list and definitions of offenses for which students in the school must (where non-discretionary) or may (where discretionary) be suspended or dismissed.

Meets the Standard	☑ Does Not Meet the Standard
Pationala	

Rationale:

• The application states that "IMAG Academy staff will annually review its discipline policies and procedures prior to its in-service and professional training period prior to school opening every year" and "Students and parents will be asked to provide feedback on the school's discipline policies and procedures during student-parent-teacher conferences." There is no mention of the inclusion of teachers in the development and/or modification of the proposed school's policies for discipline, suspension, dismissal, and crisis removal.

Section II.E: Profession		
Meets the Standard Meets the Standard Meets the Standard		
Rationale: The application does not meet the standard for the majority of the criteria in this section (three out of four criteria).		
Criterion II.E.1. Professional Culture a. A sound plan for the creation, implementation, and maintenance of a professional culture and clear explanation of how the professional culture will contribute to staff retention, how faculty and staff will be involved in school level decisions and in developing new initiatives, and how success will be assessed. Professional development and evaluation is covered in Criteria II.F.2 and should not be discussed here. b. If a high proportion of economically disadvantaged students is a part of the anticipated student population, a clear description of how the proposed school will address the anticipated academic challenges posed by the lack of socioeconomic diversity and the concentration of poverty among its students.		
Meets the Standard	Does Not Meet the Standard	
Rationale:		
Criterion II.E.2 Professional Development a. A clear description of the appropriate goals and data-o	driven strategy of the proposed school for ongoing	

professional development, including whole staff development, grade/level/course teams, and instructional coaching. The description must explain how professional development topics will be identified and how the professional development plan will be driven by data to improve teaching and learning as well as school performance. The description must also include the process for evaluating the efficacy of the professional development.

b. A description of professional development opportunities, leadership, and scheduling that effectively support the Academic Plan and are likely to maximize success in improving student achievement, including an adequate induction program. The description must explain what will be covered during the induction period and how teachers will be prepared to deliver any unique or particularly challenging aspects of the curriculum and instructional framework and methods.

c. A clear description of the expected number of days or hours for regular professional development throughout the school year that includes an explanation of how the proposed school's calendar, daily schedule, and staffing structure accommodate this plan; the time scheduled for common planning or collaboration; and an explanation for how such time will typically be used. The description must identify ways the professional development scheduling conflicts with Master Collective Bargaining Agreements, explain any specific amendments that may be needed through supplemental agreements, and provide an adequate contingency plan in the event such amendments cannot be negotiated under supplemental agreements.

d. A description identifying the person or position with the time, capacity, and responsibility for coordinating professional development and a reasonable plan for identifying ongoing professional development needs, including sufficient funds and resources (Title II funds, etc.) for implementing the professional development plan.

Meets the Standard	Does Not Meet the Standard
Detterrale.	

Rationale:

- No mention of a process for evaluating the efficacy of the professional development.
- II.B.6 (page 23) describes "three main components of our educational model; School Family framework, Manzano's High-Yield strategies, and Project Based Learning." However, the professional development topics described in this section do not cover any of the standards described in II.B.2.a, nor do they cover the following instructional strategies described in II.B.6 (pages 21-26), the last two of which are directly connected to the three main components of the school's educational model:
 - o Universal Design for Learning
 - Universal screening (tool not specified)
 - Rigor/Relevance Framework
 - New Tech Network's PBL process
 - o Marzano's High-Yield Strategies
- The application states that "Our teacher and staff induction program consist of five elements; familiarization training, grade level collaboration time, mentor discussions, frequent classroom observations, quarterly evaluations and an annual evaluation." The information provided in this section (page 48) about the program elements does not mention or include any of the identified instructional frameworks or methods, nor does the professional development plan described in the startup plan (Planning Task Force 10 Staff Professional Development in Attachment Q, pages 24-25).
- The application does not identify the ways in which the professional development scheduling conflicts with Master Collective Bargaining Agreements, although it does acknowledge that there are conflicts.
- According to Planning Task Force 10 Staff Professional Development (Attachment Q, pages 24-25), the New Teacher and Teacher Aide Orientation will occur "3 weeks prior to school start" and the School Orientation & Professional Development - All Staff will occur "2 weeks prior to school start." The additional third week for new teachers and teacher aides is not included in the list of dedicated professional development days in this section (page 49) or the list of teacher work days in the "Teacher Work Information" section of the Proposed School Year and Assessment & Collaboration Calendar (Attachment I, page 2).
- The contingency plan provided is not adequate: the professional development, orientations, and induction program are crucial to ensuring faculty and staff understanding of the school's educational model and Academic Plan, as well as their ability to implement both as intended, so a contingency plan that is essentially a promise to investigate options and to convert required professional development to paid, optional professional development (see below for excerpts) is not sufficient.

"If we are not able to negotiate our ideal proposal, we would be prepared to learn about and discuss a schedule or other options that would be acceptable in order to provide the necessary professional development prior to the school year."

"At this time, we believe 5 of the 10 days would be considered an extension of our teachers work hours...If these additional days are not allowed we would identify those subjects/sessions suitable to do earlier and use contracts paid by our US DOE Grant to pay our teachers to attend."

Criterion II.E.3

Staff Structure

a. A complete staffing chart for the proposed school, using the Staffing Chart Template (Exhibit 2) and provided as **Attachment F**, that clearly indicates all positions, is aligned with the Academic Plan, and proposes a salary structure that is in alignment with the proposed school's budget.

b. A description of a reasonable rationale for the staffing plan, as demonstrated in the staffing chart, that clearly explains how the relationship between the proposed school's leadership or management team and the rest of the staff will be managed and includes justifiable teacher-student and total adult-student ratios for the proposed school.

c. If the proposed school has a *virtual* or *blended learning program*, a clear description for the identification of the position(s) dedicated to IT support and a reasonable plan that clearly ensures sufficient capacity for deploying and managing technology inventory and network needs with minimal interruptions to teaching and learning, including troubleshooting support for school staff and students.

Meets the Standard	Does Not Meet the Standard
Patianala	

Rationale:

- The staffing chart (Attachment F) mentions a "School Ops" position, but this position is not reflected in the organizational chart (Attachment M).
- Special Education teachers are mentioned in the application as a key component of the Academic Plan (II.C.2.c, II.C.2.g, II.E.2.b) and are assigned SPED-specific professional development responsibilities, but are not represented in the staffing chart.

In the clarification interview, the Applicant Team shared that they would seek to hire core subject teachers with SPED experience or certification who could fulfill the desired non-instructional SPED responsibilities, but acknowledged that they did not have the funding for dedicated SPED teachers beyond what they might receive from the Hawaii Department of Education (which cannot be determined prior to student enrollment at the school, because the DOE allocates funding for SPED positions at charter schools on an annual basis based on the needs of the enrolled SPED students). When asked whether there was a contingency plan in the event that the school did not receive funding from the DOE for SPED teachers (e.g., based on the needs of the school's SPED students, the school received funding for SPED educational assistants, who would not be qualified to provide professional development for the school's non-SPED faculty and staff), the Applicant Team confirmed that they did not.

 According to the Teacher Weekly Schedule (Attachment K), Community-PE is on all teachers' schedules four days each week, but there are no PE teachers represented in the staffing chart. In the clarification interview, the Applicant Team confirmed that PE instruction would be an added responsibility for core and specialty teachers.

Criterion II.E.4

Staffing Plans, Hiring, Management, and Evaluation

a. A clear description of the proposed school's recruitment and hiring strategy, criteria, timeline, and procedures that are likely to result in a strong teaching staff that is highly effective in accordance with the state's plan under the Every Student Succeeds Act ("ESSA") and are well-suited to the proposed school, including other key selection

criteria and any special considerations relevant to the proposed school's design. The description must also explain strategies, including compensation packages, that are likely to attract and retain high-performing teachers.

b. If the proposed school offers a *virtual* or *blended learning program*, a clear description of the proposed school's recruitment and hiring strategy, criteria, timeline, and procedures that are likely to result in strong virtual learning teachers that have the requisite subject-matter knowledge, technological proficiency, communication skills, and other capabilities necessary to teach effectively in the virtual learning environment.

c. A clear description of realistic and legally sound procedures for hiring and dismissing school personnel, including procedures for conducting criminal history record checks.

d. A thoughtful plan for supporting, developing, and annually evaluating school leadership and teachers that is likely to produce and retain a successful staff, including a description of the processes, protocols, framework, criteria, and/or tools that will be used for conducting evaluations, delivering feedback, and coaching. The plan must cite any evidence or existing research supporting the effectiveness of utilizing the specified approach. If already developed, the plan should provide any leadership evaluation tool(s) as **Attachment G** and any teacher evaluation tool(s) as **Attachment H** that are likely to be effective. Evaluation tools must align with the criteria outlined in BOE Policy 2055 and related provisions of any Master Collective Bargaining Agreements, unless specific amendments are executed in a supplemental agreement. If amendments will be needed, the plan must describe the specific amendments that would be necessary to implement the evaluation tool(s), demonstrate an understanding of the employment environment, and include a reasonable plan for contingencies if the amendments cannot be negotiated under a supplemental agreement.

e. An effective plan that explains how the proposed school intends to promote or incentivize satisfactory and exceptional school director, management team, and teacher performance and handle unsatisfactory school director, management team, or teacher performance, including effective planning for turnover.
f. A satisfactory explanation of any deviations in staffing plans, including salaries, from Master Collective Bargaining Agreements, including identification of amendments that would be needed in a supplemental agreement and a reasonable plan for contingencies if such amendments cannot be negotiated under a supplemental agreement.

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Rationale:

- The hiring plan in Attachment Q (Planning & Initial Implementation TASK FORCE 3 Personnel Mgt & Hiring, pages 8-9) provides a timeline and high-level description of the procedures/steps of the hiring process, but no mention of hiring strategy or criteria or information about how the plan will result in a strong teaching staff that is "highly effective," as defined by the state's ESSA plan, and well-suited to the proposed school.
- No hiring or dismissal procedures are described -- the application states that "During our start up year, Year 0, our personnel recruiting task force will conduct the initial recruitment activities and work with the staff of Ho'okako'o to set up the appropriate policies, processes and record keeping for hiring, training, evaluation, professional development and dismissal."
- According to Attachment G, "Our school director will be evaluated using the same Comprehensive Evaluation System for School Administrators (CESSA) as the HI DOE;" however, the information provided in this attachment is from the 2014-2015 CESSA manual, not the current 2016-2017 manual.
- According to Attachment H, "IMAG will use the HI DOE Educator Effectiveness System (EES) to evaluate its teachers;" however, the information provided in this attachment is from the 2014-2015 EES manual, not the current 2017-2018 manual.

• The application states that "Five days are allowable prior to the school year beginning;" however, this is not consistent with the HSTA contract:

ARTICLE XVI - WORK YEAR, B. NON-STUDENT DAYS, page 57: The following shall be teacher work days without students: 1. The first four (4) days shall be without students and two (2) of these days shall be for teacher-initiated activities.

• The application states that "If we do not get the approval even with the recall pay, we would use our US DOE grant to pay a stipend or use a summer contract to pay for the extra 5 days of professional development and training." Per the PD plan outlined in Attachment Q, Planning TASK FORCE 10 - Staff Professional Development (pages 24-25), 10 days of PD are required at the beginning of each year for all staff, so this is not a sustainable plan, as the US DOE grant funding will only be available in Year 0, per IV.B.2.a (page 88).

Meets the Standard	Does Not Meet the Standard
Rationale: The application does not meet the standard for three out of the five application attachments th	one out of the two criteria in this section, and there are issues wit at are related to this section.
session, hours of instruction, holidays, days off a	t year of operation, including total number of days school is in and half days, professional development days, summer
semesters, trimesters,) including the beginning	lays of class and organization of the school year (quarters, and ending of each segment provided as Attachment I , and a gns with and clearly reflects the needs of the Academic Plan.
Meets the Standard	Does Not Meet the Standard
Rationale:	
needs of the Academic Plan, including the follow a. A description of the length and schedule of th b. A description of the length and schedule of th c. The minimum number of hours or minutes period instruction in each grade. d. The number of instructional hours or minutes e. A satisfactory explanation of why the propose learning. f. Clear information about how teachers' work w planning time and professional development. Th g. Clear information about the length of the sch teacher professional development.	ne school week. ne school day including start and dismissal times. er day and week that the proposed school will devote to academic

j. Provide as Attachment J, a sample weekly student schedule for at least one grade that is representative of each level the school intents to operate (lower elementary, upper elementary, middle, and/or high school). If scheduling structures are unique to each grade, please provide a sample schedule for each grade.
k. Provide as Attachment K, a sample weekly teacher schedule for at least one grade that is representative of each level the school intends to operate. If scheduling structures are unique to each grade, please provide a sample of the teacher's work day, supervisory time, planning periods, professional development, and any other duties the teacher performs in a given day.
I. Provide as Attachment I, a copy of the proposed school calendar for year one of the school's operations that clearly demonstrates: days that school is in session, holidays, days off and half days, professional development days, summer programming and/or instruction, first and last days of class and organization of the school year (quarters, semesters, trimesters,) including the beginning and ending of each segment.

m. A clear description, provided as Attachment D (required attachment, 1 page limit), of a school day from the perspective of a student (from their entry into the building to their exit) in a grade that will be served in the proposed school's first year of operation that aligns with the proposed school's vision and plan for school culture.
n. A clear description, provided as Attachment E (required attachment, 1 page limit), of a school day from the perspective of a teacher in a grade that will be served in the proposed school's first year of operation that aligns with the proposed school's first year of operation that aligns with the proposed school's first year of operation that aligns with the proposed school's first year of operation that aligns with the proposed school's first year of operation that aligns with the proposed school's first year of operation that aligns with the proposed school's first year of operation that aligns with the proposed school's first year of operation that aligns with the proposed school's first year of operation that aligns with the proposed school's vision and plan for professional culture.

Meets the Standard	Does Not Meet the Standard
Rationale:	

- Attachments K and I do not include information about summer school, even though summer school is mentioned in the application as a planned activity (II.G.1, page 56).
- The application references an application section that does not exist (II.G.2.e).
- Attachment E states that "Ms. Nancy eats with the students most of the time. But today she needs to do a quick visit and lunch with a teacher down the hall. Together they are preparing for next semesters project and they discuss the possibility of co-teaching strategies as well." This is not consistent with the HSTA contract:

ARTICLE VI - TEACHING CONDITIONS AND HOURS, DUTY FREE LUNCH PERIOD, page 23: Teachers shall be provided with a duty free lunch period of no less than thirty (30) minutes. The remaining time in excess of any single thirty (30) minute lunch period shall also be duty free except in those small schools wherein it would be impractical or prohibitive to do so, with respect to those teachers assigned campus and/or playground supervision of students on a rotating basis. A teacher may leave the campus during his duty free lunch period.

Meets the Standard	Does Not Meet the Standard	
Rationale:	•	
The application does not meet the standard for all of the criteria in this section (two out of two criteria).		
Criterion II.G.1		
If applicable, a description of a sound plan for any summer school programs the proposed school will offer that wi		
meet anticipated student needs, including a clear explanation for how the programs are integral to the proposed		
school's academic plan, a reasonable schedule and length of the program, and sound funding plan for the		
school's academic plan, a reasonable schedule and		
•	in the first year of operation, the plan must describe the	

Meets the Standard Meets the Standard

Rationale:

- While the applicant has created the foundations of an intersession and summer programs, the plan for operating these supplemental programs needs further development. The applicant does not explain:
 - What entity is responsible for managing and administering these programs -- these supplemental 0 programs fall outside of the duties and responsibilities of public school so the applicant must clearly articulate where the responsibilities and liabilities for these programs lie.
 - Who will staff these programs -- staff of the proposed school will be subject to collective bargaining requirements, as these are supplemental programs, the applicant has not articulated a recruitment and hiring plan for the staff of the intersession and summer programs.
 - o How the supplemental programs will operate if enrollment does not meet the target, as the funding plan is entirely based on student fees.
- The application states that "Simple and integrated supplemental programs will be imperative to fulfil our vision and mission," but these programs will be fee-based and tuition assistance may not be available ("Scholarships may be provided if grants are acquired."). Thus, the described plan for supplemental programs will prevent the school from being able to fulfill its mission and vision.

Criterion II.G.2

If applicable, well-designed plans and identified funding for any extracurricular or co-curricular activities or programs the proposed school will offer that will meet anticipated student needs and provide enrichment experiences that are in alignment with the Academic Plan. The plans must describe how the activities and programs are integral to the proposed school's academic plan, how often they will occur, how they will meet anticipated student needs, and how they will be funded. If the activities or programs will not be implemented in the first year of operation, the plans must describe the timeline for implementation.

a. A comprehensive and adequate plan for the operation of the proposed school in the event of termination of the management agreement.

Meets the Standard	Does Not Meet the Standard
Rationale:	

- - There is no program plan: the application states that "The goal of our before and after school program is to provide families a trusted and safe place for their child(ren). It will also be able to provide academic help when necessary by incorporating homework help and/or community centered projects on a smaller scale. As we would want these programs available on the first day of school, a survey will be sent out to all prospective students during the last enrollment phase in March-June to help us judge what may be needed."
 - There is no funding plan: the application states that "Initially, the cost of this program may have to be paid by each individual parent requiring the program. The A+ program funds provided by the state may be able to fund some of the costs and would be dependent upon the eligibility of those who may need or want the program. More research regarding program funding will have to be done."

Section II.H: Conversion Charter School Additional Academic Information ⊠ Not Applicable
III. Organizational Plan A strong Organizational Plan is coherent overall and aligned internally with the school's mission and vision, Academic Plan, and Financial Plan.

Section III.A: Governance		
Meets the Standard	Does Not Meet the Standard	
Rationale: While the school met several criteria under this section, there are concerns regarding the capacity of the governing board, as soon as the first year of school operations, as details about orientations and other board training and development opportunities were not provided for after the start-up phase. Also, the current membership of the nonprofit board is not in compliance with the State Ethics Code. The seriousness of this concern stems from the lack of a comprehensive recruitment plan to ensure experienced individuals, with the necessary capacity, will staff this board so it may deliver the support activities that are planned.		
Criterion III.A.1 A clear description of the mission and vision of the proposed school governing board that is aligned with the proposed school's mission and vision. If different from the proposed school's mission and vision, a clear and concise description of the governance philosophy that will guide the proposed school governing board.		
Meets the Standard	Does Not Meet the Standard	
Rationale:		
Criterion III.A.2 A description of the responsibilities of the governing board as a whole, its working relationship with the proposed school, and a description of the roles and responsibilities that each member of the governing board will have (i.e. Chairperson, Vice Chairperson, Treasurer, Secretary).		
Meets the Standard	Does Not Meet the Standard	
Rationale: Thoughtful description of the governing board's responsib	pilities.	
Criterion III.A.3 Organizational charts, provided as Attachment M (required attachment, no page limit), that clearly indicate all positions and illustrate the proposed school governance, management, and staffing structure in: a) Year 1; and b) all subsequent years until full capacity is reached. The organizational charts must clearly delineate the roles and responsibilities of (and lines of authority and reporting among) the proposed school governing board, staff, any related bodies (such as the proposed school's supporting nonprofit organization, advisory bodies, or parent/teacher councils), and any external organizations that will play a role in managing the proposed school. The organization charts must also document clear lines of authority and reporting between the proposed school governing board and proposed school and within the proposed school.		
Meets the Standard	Does Not Meet the Standard	
Rationale:		
Criterion III.A.4 A description of an effective governance structure of the proposed school governing board and how it will interact teams, any essential partners, and any advisory bodies. desired composition, powers, and duties of the propose school's success; identify key skills or areas of diverse ex proposed school governing board; and adequately expla help ensure that: a) the proposed school will be an acad	It with the school director, any school management The description must include the size, current and d school governing board that will foster the proposed pertise that are or will be effectively represented on the in how this governance structure and composition will	

governing board will effectively evaluate the success of the proposed school and school director; and c) there will be active and effective representation of key stakeholders, including parents or guardians.

Meets the Standard

Does Not Meet the Standard

Rationale:

Detailed description that meets the standard.

Criterion III.A.5

If the proposed school has a *virtual* or *blended learning program*, a clear description of the role the governing board will play in the virtual learning program that ensures the effective oversight of the virtual learning program, including a clear and realistic description of the requisite knowledge of virtual learning that the proposed governing board currently possesses or will endeavor to possess.

Not Applicable. IMAG Academy will not be using a blended or virtual learning program.

Criterion III.A.6

If the membership of Applicant Governing Board has changed from the time it submitted its Intent to Apply Packet, a reasonable explanation justifying the membership changes.

☑ Not Applicable. Response states there has been no change since the Intent to Apply packet.

Criterion III.A.7

Demonstrated will, capacity, and commitment of current and proposed governing board members to govern the proposed school effectively by providing the following:

a. A list of all current and identified proposed school governing board members and their intended roles;

b. A clear summary of members' qualifications for serving on the proposed school governing board, including an adequate explanation of how each member meets any of the considerations in HRS §302D-12 and will contribute a wide range of knowledge, skills, and commitment needed to oversee a *high-quality charter school*, including academic, financial, legal, and community experience and expertise;

c. Completed and signed Board Member Information Sheets (Exhibit 4) and resumes for each proposed governing board member, provided as **Attachment N (required form; no page limit)**, that demonstrates board members share a vision, purpose, and expectations for the proposed school;

d. If not all board members have been identified, a comprehensive and sound plan and timeline for identifying and recruiting governing board members with the necessary skills and qualifications, including a description of such skills and qualifications; and

e. If the current Applicant Governing Board will transition to a more permanent governing board, a comprehensive and sound plan for such a transition, including a reasonable timeline for recruiting and adding new members; a brief description of the individual and/or collective skills sets the anticipated board members are expected to bring, with specific reference to the skill sets described in HRS §302D-12; a description of the priorities for recruitment of additional or replacement proposed school governing board members and the kinds of orientation or training new members will receive; and identification of any bylaws, policies, or procedures changes that will be necessary for such a transition.

Meets the Standard	Does Not Meet the Standard

Rationale:

For criterion III.A.7.e IMAG Academy governing board members appear to represent a range of skill sets to foster a successful charter school. The board has also provided a detailed plan to recruit new members and develop the board. While IMAG Academy's plan indicates that new members will receive training, which meets the standard overall, it was not clear who would deliver the training and appears the board may develop its own training for members rather than utilizing an experienced governing board training organization for a knowledgeable, high-functioning governing board.

Criterion III.A.8		
Criterion III.A.8 A clear description of effective governance procedures, including an explanation of the procedure by which current proposed school governing board members were selected and how any vacancies will be filled; an explanation of how often the board will meet both during start-up and during the school year; any plans for a committee structure and identification of chairs for any proposed committee(s); and a description of the governing board meetings, including how and where meetings will be conducted, how the governing board will provide meaningful access to the public, and if board meetings are to be conducted virtually (such as through conference calls, videoconference, or web conference).		
Meets the Standard	Does Not Meet the Standard	
Rationale:		
Criterion III.A.9 A clear description of any existing relationships that could pose actual or perceived conflicts if the application is approved, the specific steps that the proposed school governing board will take to avoid any actual conflicts and to mitigate perceived conflicts.		
Meets the Standard	Does Not Meet the Standard	
Rationale:In the Clarification Interview the applicant confirmed that at the end of the start-up period, Mr. Shiraishi will transition from the governing board to the non-profit board, and will not be a member on both boards.Criterion III.A.10 A clear description of sound plans for increasing the capacity of the proposed school governing board, orientation of new members, and ongoing training and development for members, including reasonable timelines, specific and thoughtful topics and capacities to be addressed, and requirements for participation.		
Meets the Standard	Does Not Meet the Standard	
Rationale: IMAG Academy did not describe orientation, or on-going training and development after start-up phase. Since the Board Development Committee will determine the plan in the future, it is unknown what governing board training will consist of, including the topics addressed, and whether the training will be developed by the board itself, Ho'okako'o, or experienced trainers. There is a concern regarding the lack of a plan to ensure the capacity of its board members, and to continuously foster a knowledgeable, high-functioning governing board.		
will consist of, including the topics addressed, and wheth Ho'okako'o, or experienced trainers. There is a concern r	n the future, it is unknown what governing board training er the training will be developed by the board itself, egarding the lack of a plan to ensure the capacity of its	
will consist of, including the topics addressed, and wheth Ho'okako'o, or experienced trainers. There is a concern r board members, and to continuously foster a knowledge Criterion III.A.11 If applicable, a clear and comprehensive description of t including its current tax status and/or the plan and time mission and purpose. The description must specifically nonprofit organization will support the proposed schoo partnerships, finding alternative funding sources, writin resources) and specify any grants or programs that the	n the future, it is unknown what governing board training er the training will be developed by the board itself, egarding the lack of a plan to ensure the capacity of its able, high- functioning governing board. he proposed school's associated nonprofit organization, line for obtaining tax exempt status and the nonprofit's dentify ways that the proposed school's associated (such as community fundraising, developing g grants, and finding other ways to leverage existing nonprofit is planning to use. If the nonprofit's mission is on must also adequately explain any competing interests bosed school will ensure such competing interests will	
will consist of, including the topics addressed, and wheth Ho'okako'o, or experienced trainers. There is a concern re board members, and to continuously foster a knowledge Criterion III.A.11 If applicable, a clear and comprehensive description of t including its current tax status and/or the plan and time mission and purpose. The description must specifically nonprofit organization will support the proposed school partnerships, finding alternative funding sources, writin resources) and specify any grants or programs that the r not to solely support the proposed school, the description for the nonprofit's time and resources and how the prop not hinder the school's ability to operate and obtain out	n the future, it is unknown what governing board training er the training will be developed by the board itself, egarding the lack of a plan to ensure the capacity of its able, high- functioning governing board. he proposed school's associated nonprofit organization, line for obtaining tax exempt status and the nonprofit's dentify ways that the proposed school's associated (such as community fundraising, developing g grants, and finding other ways to leverage existing nonprofit is planning to use. If the nonprofit's mission is on must also adequately explain any competing interests posed school will ensure such competing interests will iside supports.	
will consist of, including the topics addressed, and wheth Ho'okako'o, or experienced trainers. There is a concern re board members, and to continuously foster a knowledge Criterion III.A.11 If applicable, a clear and comprehensive description of to including its current tax status and/or the plan and time mission and purpose. The description must specifically nonprofit organization will support the proposed school partnerships, finding alternative funding sources, writin resources) and specify any grants or programs that the proposed school, the description for the nonprofit's time and resources and how the prop	n the future, it is unknown what governing board training er the training will be developed by the board itself, egarding the lack of a plan to ensure the capacity of its able, high- functioning governing board. he proposed school's associated nonprofit organization, line for obtaining tax exempt status and the nonprofit's dentify ways that the proposed school's associated (such as community fundraising, developing g grants, and finding other ways to leverage existing nonprofit is planning to use. If the nonprofit's mission is on must also adequately explain any competing interests bosed school will ensure such competing interests will	

experience and qualifications relevant to the above means of supporting the proposed school. If none of the current nonprofit board members have the requisite experience or capacity, the description must explain a comprehensive plan to identify and recruit individuals with the necessary experience and capacity.

Meets the Standard	Does Not Meet the Standard	
Rationale:		
 The current membership of the nonprofit is not in compliance with the State Ethics Code. Response states "board membership will be re-aligned to ensure no conflict of interest will take place". The response does not explain a comprehensive plan to identify and recruit individuals with the necessary experience and capacity but rather simply states "will continue to recruit those with experience and capacity". The intended roles of the nonprofit members, Financial Management, Policy Development and Governance, Strategic Planning and Events Management, are not relevant to the means of supports, stated by the applicant as "school funds development, fundraising, grant writing, fiscal sponsorship/agency and strategic visioning assistance" that the nonprofit intends to provide IMAG Academy. Lacking an explanation of a comprehensive plan, the response does not provide confidence that the nonprofit will recruit individuals with the experience and capacity necessary to carry out the support activities, thus does not inspire confidence that the nonprofit will be able to provide the support needed by the school. 		
Criterion III.A.13 Discuss the procedures to be followed in the event of closure or dissolution of the school. Identify procedures to be followed in the case of the closure or dissolution of the charter school, including provisions for the transfer of students and student records to the complex area in which the charter school is located and for the disposition of the school's assets to the State Public Charter School Commission (SPCSC). Provide assurance that the school will follow any additional procedures required by SPCSC to ensure an orderly closure and dissolution process, including compliance with the applicable requirements of Hawaii Revised Statutes <u>§302D-19</u> . Meets the Standard		
Strengths:		

Section III.B: Academic, Financial, and Organizational Performance Management Meets the Standard Meets the Standard Meets the Standard

Rationale:

It is was not clear that data analysis of student cohorts, and the school as a whole, happens throughout the year, nor the end of each year, and there was no mention of monitoring academic achievement to the term of the Charter Contract. The applicant did not explain a detailed plan for providing training to its school directors, teachers, and governing board members to be to analyze, interpret, and utilize academic data to improve student learning and school success.

It was not explained how the positions collecting/compiling and interpreting data for the school director and governing board will be provided time to fulfill data responsibilities.

Criterion III.B.1

Comprehensive and effective plans for evaluating and monitoring academic, financial, and organizational performance that explain how the proposed school will measure and evaluate performance data, including:

a. Academic Performance Data Evaluation Plan. A comprehensive and effective plan and system for:

i. Collecting, measuring, and analyzing student academic achievement data of individual students, student cohorts, and the school as a whole—throughout the school year, at the end of each academic year, and

for the term of the Charter Contract—including identification of the student information system to be used;

ii. Using the data to refine and improve instruction, including descriptions of training and support that school directors, any management team, teachers, and governing board members will receive in analyzing, interpreting, and using academic performance data to improve student learning; the qualified person(s), position(s), and/or entities that will be responsible for managing the data, interpreting it for teachers, and leading or coordinating data-driven professional development to improve student achievement; and how the person(s), position(s), and/or entities will be provided time to complete the aforementioned collection, analysis, management, interpretation, and coordination of data-driven professional development; and

iii. Reporting the data to the school community.

b. Financial Performance Data Evaluation Plan. A comprehensive and effective plan and system for maintaining, managing, compiling, and interpreting financial data monthly, quarterly, annually, and for the term of the Charter Contract, including descriptions of the qualified person(s), position(s), and/or entities that will be responsible for maintaining the data, managing the data, compiling it, and interpreting it for the school director and governing board and how the person(s), position(s), and/or entities will be provided time to complete the aforementioned maintenance, management, compiling, and interpretation.

c. Organizational Performance Data Evaluation Plan. A comprehensive and effective plan and system for maintaining, managing, compiling, and interpreting organizational performance data monthly, quarterly, annually and for the term of the Charter Contract, including descriptions of the qualified person(s), position(s), and/or entities that will be responsible for compiling data on performance and interpreting it for the school director and governing board and how the person(s), position(s), and/or entities will be provided time to complete the aforementioned compiling and interpretation.

Meets the Standard		Does Not Meet the Standard	
Rationale:	Rationale:		
Academic Performance Data Evaluation Plan			
i.	Collecting, measuring, and analyzing student academic achievement data		
	 Collaboration Calendar, it was school as a whole happens throwas no mention of monitoring Contract. Application states that "Approproproprehensive Student Support 	o Conference" are days scheduled on the Assessment and not clear that data analysis of student cohorts and the bughout the year, nor the end of each year, and there academic achievement to the term of the Charter oriate information systems will be used; Electronic rt System and Electronic Student Information System;" ng the "Electronic Student Information System" (eSIS) in	
ii.	Using the data to refine and improve in	struction	
	Targets, II.B.5 –Data Use Practi Populations and Attachment I - school directors, teachers, and interpreting, and using academ qualified person(s), position(s),	application sections and attachments (II.B.4 – Goals & ces, II.B.6 – Instructional Strategies and II.C – Special – First Year Calendar) about training and support that governing board members will receive in analyzing, the performance data to improve student learning; the and/or entities that will be responsible for managing the res and leading or coordinating data-driven professional ent achievement	
iii.	Reporting the data to the school commu	unity	

be accomplished in a stakeholder;" howev	es that "Daily, weekly, monthly, quarterly and annual reporting will accordance with the required reporting processes for each ver, application does not provide the "required reporting processes" olders (i.e., parents and families, community members).		
Organizational Performance Data Evaluation Pla	an		
IMAG Academy does not explain how the positions collecting/compiling and interpreting data for the school director and governing board will be provided time to fulfill data responsibilities. For example, these positions are listed in the table as responsible positions: SASA and Academic Coach, Counselor, Student Services and Project Coordinator, Student-Parent Coordinator. While some of the assigned tasks could naturally fall under a typical day of some positions, others may not. For example, data tasks listed under SASA responsibilities may not be the typical activities seen of a SASA position while there is no mention how the SASA will be provided time to complete the possible irregular tasks: index of test scores, growth, readiness, and achievement gap, number of students enrolled vs projected, number/percentage of workers who leave and replaced, survey of what a student actually does after graduation, percentage of students graduating, number of reports/items meeting reporting requirements, number (and who) was absent.			
Criterion III.B.2			
A clear description of thoughtful, appropriate	corrective actions the proposed school will take if it falls short of:		
a. Student academic achievement expectation	is or goals at the school-wide, classroom, or individual student		
level, including an explanation of what would	trigger such corrective actions and the person(s), position(s),		
and/or entities that would be responsible for implementing them.			
b. Financial performance standards set in the Financial Performance Framework, including an explanation of the actions that would be taken if the proposed school is issued Notices of Concern or Deficiency under the terms of the Charter Contract, if the independent auditor issues findings, or if the proposed school encounters financial difficulties.			
c. Organizational performance standards set in the Organizational Performance Framework, including an			
explanation of the actions that would be taken if the proposed school is issued Notices of Concern or Deficiency under the terms of the Charter Contract or if the proposed school has a corrective action plan approved by the Commission.			
Meets the Standard	Does Not Meet the Standard		
Rationale:			

Section III.C: Ongoing Operations		
□ Meets the Standard		
Rationale:		
The applicant does not provide a sound plan for how it will provide food for the students who qualify for Free and		
Reduced Lunches despite the recognition of the needs of the community that the school plans to serve. There is an		
important since the school anticipates that 55% of its student population would meet the qualifications. The		
applicant failed to align its lunch program with its Financial Plan as it did not include for food services fees in Year		
1, Year 2, and Year 3 nor the fundraising activities that would be needed to fund the program through alternative		
means.		

Criterion III.C.1		
Citterion m.c.1		
If the proposed school will provide daily transportation,	a sound plan describing the transportation	
arrangements for prospective students, including a desc	ription of how the proposed school plans to meet	
transportation needs for field trips and athletic events.	f the proposed school will not provide daily	
transportation, what were the factors that led to this de	cision and what was the impact of not providing	
transportation?		
Meets the Standard Does Not Meet the Standard		
Rationale:		
	nere were questions related to opening campus early that	
were not addressed during the Clarification Interview due	e to time constraints.	
Criterion III.C.2		
Sound plans for safety and security for students, the fac		
the types of security personnel, technology, and equipm		
proposed school has a virtual or blended learning progra	am, the description must include physical or virtual	
security features to deter theft.		
Meets the Standard	Does Not Meet the Standard	
Rationale:		
Criterion III.C.3		
If the proposed school will provide food service, a sound plan describing the proposed school's plan for		
providing food to its students, including plans for a facili	ty with a certified kitchen, transporting food from a	
providing food to its students, including plans for a facili certified kitchen, or other means of providing food servi	ty with a certified kitchen, transporting food from a ce that is in compliance with applicable laws. If the	
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Section III.D: Student Recruitment, Admission and Enrollment		
□ Meets the Standard		
Rationale:		
No contingency plan was provided for enrollment targets.		
Important sections of the admissions and enrollment policy is not in compliance with applicable laws, Commission policies, and may preclude eligible students from applying or attending the proposed school.		

Criterion III.D.1 A sound, thoughtful, and comprehensive plan for student recruitment and marketing that will provide equal access to interested students and families and specifically describes plans for outreach to families in poverty, academically low-achieving students, students with disabilities, and other youth at risk of academic failure, as well as plans for promoting socioeconomic and/or demographic diversity, including a description of how the proposed school will attempt to make itself attractive to families with relatively higher incomes and/or levels of formal education if the proposed school is projecting a high percentage of free and reduced lunch and intends to achieve socioeconomic and/or demographic diversity. Meets the Standard Does Not Meet the Standard Rationale:			
	on III.D.2 cable, the identification and description of any er	prollment preferences that the proposed school would	
		w and any Commission policies or guidelines, including a	
	able justification for the enrollment preference ro		
A Mee Rationa	ts the Standard	Does Not Meet the Standard	
Rationa	ale:		
Criterio	on III.D.3		
laws an	An admission and enrollment policy, provided as Attachment O (no page limit), that complies with applicable laws and any Commission policies or guidelines, ensures the proposed school will be open to all eligible students, and includes:		
a.	a. A reasonable timeline and comprehensive plan for the application period, including admission and enrollment deadlines and procedures and an explanation of how the school will receive and process applications;		
b.	A reasonable timeline and comprehensive plan for student recruitment or engagement and enrollment;		
c.	Effective procedures for lotteries, waiting lists, withdrawals, re-enrollment, and transfers in accordance with state and Commission requirements;		
d.	Descriptions of reasonable pre-admission activities for students and parents or guardians, including an explanation of the purpose of such activities;		
е.	A description of how the school will ensure that it will meet its enrollment targets; and		
f.	f. A contingency plan if enrollment targets are not met.		
🗆 Mee	ts the Standard	☑ Does Not Meet the Standard	
Rationa	Rationale:		
Respon	Response did not meet the criteria:		
•	 The applicant recognizes the importance of achieving the enrollment targets stating "our enrollment and financial success hinges on our ability to attract committed families according to our enrollment 		
	projections", but does not provide a contingency plan if enrollment targets are not met. Rather the		
	response states (pg. 22 of Attachment Q) that information distribution will increase if milestones are		
	missed to ensure maximum exposure and intends that the number of public school students in the area		
•	 ensures they will meet their targets. Sections of the admissions and enrollment policy are not in compliance with applicable laws and/or 		
-	Commission policies or guidelines and/or may preclude an eligible student from applying or attending:		
	• A mandatory orientation before applying is not in compliance with applicable laws and may		

A mandatory orientation before applying is not in compliance with applicable laws and may preclude an eligible student from applying

- Only IEP teams decide what services are needed and the school is mandated to meet the provision of the IEP. The school does not decide what services they will provide. Policy statement: "Parents will meet with our school representatives to determine the services needed for their child and what services The IMAG Academy is able to provide. This will help us to ensure the appropriate services are provided for your student."
- Un-enrolling for absences is not in compliance with applicable laws or the charter contract.
- The admissions policy does not comply with applicable laws and Commission policies and guidelines. If the charter is approved the admissions policy will need to be amended:
 - to include a clarification regarding whether the enrollment preference for governing board members applies only to "founding" board members or all board members including future members and "founding" will need to be defined
 - to clarify the process for applying siblings so it's clear that these applicants are still eligible participate in the lottery if there are no spaces available in the applicable grade. Policy states "Siblings will be given a space in the appropriate grade if a space is available. If a lottery is required, siblings will not participate in the general lottery process." Siblings should
 - o to clarify how the waitlisted applications are handled during the Rolling admission period.
 - Parents don't have the ability to "provide timely access to relevant documents". Records need to be requested from the previous school.

Section III.E: Geographic Location and Facilities		
Meets the Standard	Does Not Meet the Standard	
Rationale: There is a concern that square footage figures may not be realistic because they are not well-supported assumptions and relatedly, there is a concern that the planned size of the facility is inadequate for the number of projected students. It appears the school may provide 4 times less space per student than neighboring DOE schools. A detailed explanation is needed to understand the proposed school's rationale.		
The applicant did not demonstrate that facilities will be reasonably adequate for the school, nor is a sound plan for renovating, and does not inspire confidence in the estimations which appear low.		
The applicant did not include how the school will accommodate the additional square footage necessary for additional students, faculty, and/or staff for the school's growth in the Enrollment Plan. There appears to be a reliance that a building that fits into the budget, will be available. However, without evidence supporting this assumption, this is not a sound plan for growth.		
 Criterion III.E.1 Geographic Location. a. A description, with reasonable specificity, of the geographic location of the proposed school's facility, including the DOE complex area(s) in which the proposed school will be located. b. A reasonable rationale for selecting the geographic location and a comprehensive description of the research conducted, if any, to support that rationale. 		
Meets the Standard	Does Not Meet the Standard	
Rationale:		
Criterion III.E.2		
Facilities		
a. <u>If the proposed school has obtained a facility</u> , a description of the facility—including address, square footage, square footage rent, amenities, previous use, and what needs to be done in order for the facility to be in compliance and meet requirements to serve as a school—demonstrating that the facility is reasonably adequate for the intended purposes, has a sound plan and timeline for renovating and bringing the facility		

into compliance with applicable building codes, and will meet the requirements of the Academic Plan, including the needs of the anticipated student population. If the proposed school has a *virtual* or *blended learning program*, or relies heavily on technology, the description must adequately explain how the facility will support the proposed technology model, including electrical capacity and access to sufficient network capacity.

OR

If the proposed school has not obtained a facility, a comprehensive, reasonable, and sound plan and timeline for identifying, securing, renovating, and financing a facility—including identification any brokers or consultants the applicant is employing—that will be in compliance with applicable building codes and meet the requirements of the Academic Plan, including the needs of the anticipated student population. The plan must briefly describe possible facilities within the geographic area in <u>Criterion III.E.1</u>, including addresses, square footage, square footage rent, amenities, previous use, and a general assessment of what needs to be done to bring each possible facility into compliance. If the proposed school has a *virtual* or *blended learning program*, or relies heavily on technology, the description must adequately explain how each possible facility will support the proposed technology model, including electrical capacity and access to sufficient network capacity.

b. If the proposed school plans to add students or grade levels during the first five years, a reasonable and sound facility growth plan that shows how the school will accommodate the additional square footage necessary for additional students, faculty, and staff and sufficiently identifies any permits or rezoning that might be necessary to implement the facility growth plan.

Meets the	Standard	Does Not Meet the Standard	
Rationale:			
 Response did not include a comprehensive plan that met the criteria: 			
 Several buildings are represented in Attachment Q but not descriptions of the listed buildings such as the addresses, square footage, square footage rent, amenities, previous use, or general assessment of what needs to be done to bring each possible facility into compliance. 			
	the projections may not be realistic beca the Clarification Interview the applicant High School and used that to determine known what the square footage figures There is a concern that IMAG Academy's		

- application, is inadequate for the number of students projected in the Enrollment Plan. A DOE report, dated July 19, 2016, to the Finance and Infrastructure Committee, reported an average of 107 square ft. per student of the schools located in Central Oahu. IMAG Academy is projecting nearly 4 times less space per student.
- In the Clarification Interview, the applicant reported the renovation costs are based on IMAG Academy finding ready-to-use office space that doesn't require expensive fixes to be converted to a school, and that the costs were based on research of other buildings, for previous charter school application cycles. Without a general assessment of the specific buildings in attachment Q, IMAG Academy's plan for renovating and financing a facility, that will be in compliance with applicable building codes, neither demonstrates that facilities will be reasonably adequate for the school, nor is a sound plan for renovating, and does not inspire confidence in the estimations which appear low.
- b. The project plan referred to in the response does not include how the school will accommodate the additional square footage necessary for additional students, faculty, and/or staff for the school's growth in the Enrollment Plan. In the Clarification Interview the applicant provided simply that the criteria for selecting a facility is to find a building that would accommodate the growth. The applicant is relying on an assumption that a building that fits into their budget, which is based on "minimum renovations and

permitting concerns", will be available. Without evidence supporting these assumptions, this is not a sound plan for growth.

Section III.F:	Start-Up Period	
🛛 Meets the Standard	Does Not Meet the Standard	
Rationale:		
Applicant met the standard for two out of two criteria k	pelow.	
Criterion III.F.1		
A comprehensive, reasonable, and sound management plan for the start-up period, provided as Attachment Q (no page limit), that aligns with the Academic, Organizational, and Financial Plans (including the start-up year (Year 0) budget in the Financial Plan Workbook). The management plan must detail the start-up plan for the proposed school, including specific tasks, timelines, milestones, and responsible individuals for each of the following areas a. Plans to obtain financing for the proposed school's facility, highlighting the alignment of the financing plan with the timing of obtaining and renovating the facility, as described in Criterion III.E.2; b. Plans to fund the start-up period, including all plans for fundraising and grant writing and a description of any specific fundraising opportunities and grants the applicant has identified; c. Plans to market the proposed school to the school's anticipated student population and develop partnerships with other charter schools, DOE schools, and private schools to identify possible students and achieve the proposed school's projected enrollment, including any other ways the applicant plans to achieve its projected enrollment; d. Plans to hire teachers, administrative staff, and support staff during the start-up period, if any, incorporating the timelines for hiring teachers, described in Criteria II.F.4, and delivering the professional development, described in Criteria II.F.2; e. Plans to identify, recruit, select, and add or replace new governing board members that align with the recruitment plan described in Criterion III.A.7.d, the governing board transition plan described in Criterion III.A.7.e, and any governing board training described in Criterion III.A.10, as applicable; and f. Any other plans for activities that will need to be completed during the start-up period, such as the selection of curriculum materials, as applicable.		
☑ Meets the Standard	Does Not Meet the Standard	
Rationale:		
The response met the criteria technically, however there are concerns regarding the alignment of the financing plan with the timing of facility renovations. Renovation activities in the Financial Management Plan (page 16 of attachment Q), happen in May-June 2020 (item 16), but the renovation activities in the Facility Acquisition Project Plan (page 11 of Attachment Q) start in December 2019 (item 27), 6 months earlier. There is a concern regarding readiness, or availability, of finances when any renovations begin.		
Criterion III.F.2		
A sound plan for leading the development of the school during its pre-opening phase, including identification of capable individuals who will work on a full-time or nearly full-time basis following approval of the application to lead development and implementation of the plan to open the proposed school and a description of a viable plan to obtain the funding necessary to compensate these individuals that is aligned with the budget.		
Meets the Standard	Does Not Meet the Standard	
Rationale:		

Section III.G: Conversion Charter School Additional Organizational Information

Section III.H: Third Party Service Providers	
Meets the Standard	Does Not Meet the Standard
Rationale: The applicant and its Service Provider, Ho'okako'o Corporation, have yet to finalize and clarify the terms of the Service Agreement. A draft Service Agreement was provided by the applicant which seems to delineate the roles and responsibilities of the proposed school and Ho'okako'o Corporation. The draft agreement also provides the terms and fee schedule; however, there appears to be uncertainty as the final costs have not been agreed upon.	
Criterion III.H.1	
Service Provider Selection and Track Record	
a. A reasonable explanation of why the applicant is seeking the proposed school(s) directly.	ng to contract with a Service Provider rather than operate
b. A description of a thorough process that the applicant used to identify, vet, and select the Service Provider. The description must explain how and why the Service Provider was selected, including when and how the applicant learned of the Service Provider, which other Service Providers were considered, why the Service Provider was selected over other Service Providers, and what due diligence was conducted, including a summary of the findings of the reference checks conducted by the applicant.	
c. If the Service Provider is providing academic services, evidence demonstrating academic success, especially in the grade levels the proposed school intends to serve, including academic performance data of all clients of the Service Provider that demonstrates the provider's services lead to <i>high-quality charter schools</i> , as defined in the RFP. Provide, as Attachment AA (no page limit) , academic performance data for each of the Service Provider's charter school clients that shows evidence of strong academic results for the past three years (or over the life of the charter school, if the school has been open for fewer than three years), based on the following factors:	
 i. Increased student academic achievement and attainment (including, if applicable and available, high school graduation rates and college and other postsecondary education enrollment rates) for all students, including, as applicable, educationally disadvantaged students, as defined in the RFP, served by the charter school; 	
ii. Either—	
1. Demonstrated success in closing historic achievement gaps for the following subgroups of students at the charter school: low-income students, students from major racial and ethnic groups, students with disabilities, and English language learners; or	
2. No significant achievement gaps between any of those subgroups of students at the charter school and significant gains in student academic achievement for all populations of students served by the charter school; and	
iii. Results (including, if applicable and available, performance on statewide tests, annual student attendance and retention rates, high school graduation rates, college and other postsecondary education attendance rates, and college and other postsecondary education persistence rates) for low-income and other <i>educationally disadvantaged students</i> served by the charter school that are above the average academic achievement results for such students in the state.	
d. A listing and explanation of any management contract terminations, charter revocations, non-renewals, or withdrawals or non-openings that the proposed Service Provider has experienced in the past five years that does not indicate that the Service Provider lacks the necessary capacity or display inconsistencies in its academic, organizational, or financial performance. The explanation must reference the other jurisdictions where the Service Provider operates or services other charter schools and provide, as Attachment BB (no page limit) , a list of all the	

charter schools operated or managed by the Service Provider, the respective authorizer for each of those charter schools, and contact information for each authorizer.

e. A list or description of all charter schools operated or managed by the Service Provider that are accredited, if any, including a list or description of the accrediting organization for each accredited school and a current accreditation report from **one** of those schools, provided as **Attachment CC (no page limit)**, that demonstrates strong organizational health attributable to the Service Provider.

Meets the Standard

Does Not Meet the Standard

Rationale:

The applicant has chosen to work with a service provider, Ho'okako'o Corporation, that has shown success working with three public conversion charter schools. IMAG Academy would be the first start-up public charter school Ho'okako'o Corporation would work with. The service provider was chosen following a review of three agencies, with the school's experience in working with charter schools being a decisive factor in the final decision.

Criterion III.H.2

Legal Relationships

a. Full disclosure of any existing or potential conflicts of interest between the proposed school governing board, proposed school's employees, proposed Service Provider, and any affiliated business entities and a satisfactory explanation as to how such existing or potential conflicts of interest will be addressed.

b. A list of all subsidiaries or related entities that are affiliated or owned in whole or in part by the Service Provider, a description of the nature of those entities' business activities, an explanation as to whether the proposed school has or will have any relationship with or receive any services from any of those entities, and a reasonable justification for any such relationship.

c. If the Service Provider will have supervisory responsibilities, a description of the supervision of the proposed school employees by the Service Provider that is reasonable, legally sound, and aligns to Master Collective Bargaining Agreements and gives the proposed school governing board oversight over the Service Provider's supervisory responsibilities. The description must explain the supervisory responsibilities of the Service Provider will supervise, how the Service Provider will supervise these employees, and how the proposed school governing board will oversee the Service Provider's supervisory responsibilities.

d. If the proposed school governing board intends to enter into any type of lease, lease-purchase agreement, or any other facility or financing relationships with the Service Provider, draft facility or financing agreements, or other evidence, provided as Attachment DD (no page limit), that:

i. Demonstrate such agreements are separately documented and not part of or incorporated in the proposed school's management contract; and

ii. Ensure any agreements are consistent with the proposed school governing board's authority and practical ability to terminate the management agreement and continue operation of the proposed school.

e. A description of any loans, grants, or investments made between the Service Provider and the proposed school or the proposed school's associated nonprofit organization, including a legally sound explanation of how any such loans, grants, or investments may be initiated, repaid, and refused by the proposed school or the proposed school's associated nonprofit, as applicable.

|--|

Rationale:

The applicant and its Service Provider, Ho'okako'o Corporation, have yet to finalize and clarify the terms of the Service Agreement. A draft Service Agreement was provided by the applicant which seems to delineate the roles and responsibilities of the proposed school and Ho'okako'o Corporation. The draft agreement also provides the terms and fee schedule; however, there appears to be uncertainty as the final costs have not been agreed upon.

(See next section for detail)

Criterion III.H.3

Service Provider's Organizational Structure

a. A detailed description of the roles and responsibilities of the Service Provider that adequately and accurately describes how the Service Provider fits into the proposed school's organizational structure and how the organizational structure ensures the proposed school governing board is independent from the Service Provider and self-governing, including a satisfactory description of independent legal representation and arm's-length negotiating.

b. A satisfactory business plan that demonstrates the Service Provider will be able to provide the services in the management agreement. The business plan must explain how the Service Provider will grow, scale, or adjust its operations to ensure quality service to the proposed school.

c. An effective and comprehensive oversight and evaluation plan for overseeing the Service Provider. The oversight and evaluation plan must include the school-wide and student achievement results that the management organization is responsible for achieving, the methods the proposed school governing board will use to review and evaluate the Service Provider's progress toward achieving agreed-upon goals, the frequency of such reviews and evaluations, an explanation whether there will be an external evaluator to assess the Service Provider's performance, and the conditions, standards, and procedures for the proposed school governing board intervention, if the Service Provider's performance is deemed unsatisfactory.

d. A comprehensive description of the respective financial responsibilities of the proposed school governing board and the Service Provider that allows for reasonable financial controls from the proposed school governing board. The description must include details about who will own property purchased with public funds, which operating and capital expenditures each party be responsible for, the types of spending decisions the Service Provider can make without obtaining board approval, the reports the Service Provider must submit to the proposed school governing board on financial performance and the schedule for reporting, and how the proposed school governing board will provide financial oversight.

Rationale:

The applicant and its Service Provider, Ho'okako'o Corporation, have yet to finalize and clarify the terms of the Service Agreement. A draft Service Agreement was provided by the applicant which seems to delineate the roles and responsibilities of the proposed school and Ho'okako'o Corporation. The draft agreement also provides the terms and fee schedule; however, there appears to be uncertainty as the final costs have not been agreed upon.

The draft fee schedule states that Ho'okako'o Corporation will be paid \$65,000 for its service once the school begins operations. However, the Financial Plan workbook, which provides the operating budget submitted by the applicant, states that Ho'okako'o Corporation's fee for Year 1 will be \$55,000. During the clarification interview, the applicant stated that the fee for Year 1 would be \$55,000; however, the executive director of Ho'okako'o Corporation stated that the fee was \$65,000 as stated in the draft agreement. To explain the conflicting answers, the applicant mentioned conversations with Ho'okako'o Corporation staff members in which the lower fee was offered.

The applicant's proposed budget for Year 1 provides for an end-of-year cash balance of approximately \$31,500, which would amount to about 7 days cash-on-hand. This amount of days cash-on-hand would result in a significant risk designation for the school in its first year of operation. The difference of \$10,000 in the Service Agreement would result in the school lowering its already significantly low amount of days cash on hand, thereby further increasing the risk of financial insolvency in the school's first year of operations.

In addition, the applicant does not provide the methods the proposed school governing board will use to review and evaluate the Service Provider's progress, or an explanation of whether there will be an external evaluator to assess the Service Provider's, or the procedures, standards, or conditions, for interventions. The applicant simply states that Ho'okako'o will be assessed annually and lists the assessment areas.

IV. Financial Plan

A strong Financial Plan is coherent overall and aligned internally with the proposed school's mission and vision, Academic Plan, and Organization Plan.

Section IV.A: Financial Ov	versight and Management	
Meets the Standard	Does Not Meet the Standard	
Rationale:		
Applicant did not meet the standard for one of three crite	ria below.	
Criterion IV.A.1		
A clear description that gives reasonable assurance that	the proposed school will have sound systems, policies,	
and processes for financial planning, accounting, purcha		
how the proposed school will establish and maintain str	-	
financial reporting requirements. The description must		
annual audit of the financial and administrative operation		
state law, including a reasonable annual cost estimate o	f the audit that is included in the Financial Plan	
Workbook.		
Meets the Standard	Does Not Meet the Standard	
Rationale:		
The applicant has provided reasonable assurances of sour		
accounting, purchasing, and payroll. Though financial pol		
adopted by the school governing board, the applicant has		
governing board, school administration and its financial se	ervice provider, Ho'okako'o Corporation.	
Criterion IV.A.2		
	demonstrates a strong understanding of the appropriate	
delineation of such roles and responsibilities among the		
and proposed school governing board regarding school f		
Meets the Standard	Does Not Meet the Standard	
Rationale:		
The described system of financial oversight by the school		
and responsibilities between the school administration, s	-	
provider, Ho'okako'o Corporation, sets the foundation for Criterion IV.A.3	a sound system.	
	ing venders or contractors for any administrative	
A description of sound criteria and procedures for selecting vendors or contractors for any administrative		
services, such as business services, payroll, and auditing services, including reasonable anticipated costs that are reflected in the Financial Plan Workbook.		
Meets the Standard	☑ Does Not Meet the Standard	
Rationale:		
The applicant does not meet the standard for this section as the applicant and its contractor for business and		
financial services, Ho'okako'o Corporation, have provided conflicting fee schedules to the evaluation team. As		
previously stated, Ho'okako'o Corporation states that its fee is \$65,000 as described in the draft service agreement		
provided in the application, while the applicant states that the fee is \$55,000 as stated in the annual budgets		
provided in the application. The inability to agree upon a service agreement with its primary, and initial,		
contractor in the application phase provides evidence that the applicant needs to further develop its policies and		
procedures for selecting vendors or contractors.		
Furthermore, while the applicant has provided a system of vendor and contractor selection that requires the		
school to establish an approved vendors' list, internally, the applicant would have Ho'okako'o Corporation review		
contracts and agreements for completeness prior to the contracts being presented to the governing board. This		
would be a sound system if the applicant provides for a legal review by the appropriate agencies.		

	perating Budget
Meets the Standard	Does Not Meet the Standard
Rationale: The applicant did not provide a complete, realistic, and vi applicant did not complete the Financial Plan workbook for submitted. The applicant did provide start-up year budge evaluation team was able to review to substitute for the b Criterion IV.B.1	or its start-up budget (Year 0); a blank spreadsheet was et information in the narrative proposal that the blank spreadsheet.
Complete, realistic, and viable start-up and three-year o Norkbook (<u>Exhibit 5 and 5a</u>) as Attachment S , that aligr	
Meets the Standard	Does Not Meet the Standard
Rationale: The applicant did not provide a complete, realistic, and vi applicant did not complete the Financial Plan workbook for submitted. The applicant did provide start-up year budge evaluation team was able to review to substitute for the b	or its start-up budget (Year 0); a blank spreadsheet was et information in the narrative proposal that the blank spreadsheet.
The applicant did not include food service costs in the operations and a snack in Year 1 of operations and break anticipates more than 55% of its students will qualify for the applicant did not expect to have a certified kitchen in deliver meals. The application further provides a projecter as previously stated, the annual budgets for Years 1 througrants, donations, and fundraising may be needed to cover contingency plans did not find any mention of canceling feeduation team can only conclude that food service will be provided.	fast by Year 4. This is driven by the fact that the school free or reduced lunch. As described in the application, its facility, so contracted vendors would provide and ed cost of \$115,000 for food service for Year 1. However ugh 3 do not have any food costs, though it is stated that er the Year 1 cost. A review of the applicant's ood service if enrollment projections are not met. The
In the clarification interview, the applicant stated that food costs were not included in the budgets as the school would need to apply for and be approved to participate in the National School Lunch Program (NSLP). Applicants were not allowed to provide unsubstantiated federal funding in the budget; however, the federal reimbursement does not cover the full costs of school meals. Even if approved for the NSLP, the applicant will need to budget for food costs on some level.	
The absence of any food costs for any years renders the budget unreliable and incomplete. Though the applicant states that grants, donations, and fundraising may be needed to cover costs for this service, these costs are not accounted for in the Year 1 cash flow provided. As food service is a costly expense for public schools, the absence of any food costs raises serious questions and doubts of the applicant's ability to provide this service. With more than half the projected student population qualifying for free or reduced lunch, the absence of food service would have a negative impact on students. On the other hand, should the school provide food service, the budget provided would be unreliable and moot, resulting in concerns and doubts of the school's ability to implement other facets of its academic and organizational plan.	
Criterion IV.B.2	
Budget Narrative	

must specifically address the degree to which the school budget will rely on variable income (especially for grants, donations, and fundraising) and must include the following:

a. A description indicating the amount and sources of funds, property, or other resources expected to be available not only via per-pupil funding but also through corporations, foundations, grants, donations, and any other potential funding sources. The description must note which are secured and which are anticipated; explain evidence of commitment, and provide such evidence as Attachment T (no page limit), for any funds on which the proposed school's core operation depends (*e.g.*, grant award letters, MOUs); and describe any restrictions on any of the aforementioned funds.

b. A sound contingency plan to meet financial needs if anticipated funding is not received or is lower than estimated, including contingencies for scenarios where the official enrollment of the proposed school is substantially lower than projected and/or anticipated variable income is not received. The contingency plan must also include a Year 1 cash flow contingency, in the event that funding projections are not met in advance of opening.

c. If the proposed school has a *virtual* or *blended learning program*, a clear and comprehensive description of the necessary costs for delivery of such program, including costs associated with hardware, software, peripheral needs (cases, headphones, chargers, etc.), storage, and network infrastructure needs, as applicable.

Meets the Standard	Does Not Meet the Standard
Detionale	

Rationale:

There are several concerns whether the Budget Narrative explains well-supported cost assumptions:

- Staffing levels, specifically teacher salaries, appear low at \$53,000 (per teacher, for all teachers, each year of the budget). This means the proposed school is limited to hiring teachers whose qualifications or experience are at the lower levels. There are three teacher Classes that include salary Steps around a \$53,000 salary level or lower in the 2020-2021 school year salary schedule: Class II teachers, Step 7 or lower; Class III teacher, Step 5 or lower; or Class IV, Step 3 or lower. Teacher classifications in each Class go up to Step 14B and there are seven Classes of teachers. Teachers with licenses start at Step 5, all lower Steps have not completed a State Approved Teacher Education Program. What this appears to mean for the proposed school is that they could only afford a licensed teacher at the lowest levels, either one who has only a BA degree, or a teacher with a BA+30 or an MA, but at the first/lowest level above a teacher who does not yet have a license.
- There is a concern that the cost projections, specifically the rental/lease for the school building and grounds, may not be realistic because they are not well-supported assumptions. During the Clarification Interview the applicant reported that they measured a classroom in Waipahu High School and used that to determine the square footage needs for its classrooms; it is not known what the square footage figures for "common areas" and "school office" are based on. A DOE report, dated July 19, 2016, to the Finance and Infrastructure Committee, reported an average of 107 square ft. per student in DOE schools located in Central Oahu. IMAG Academy is projecting almost 4 times less space per student, however there is no explanation to support this rationale. Although charter schools are encouraged to develop creative solutions, there is a concern since the application does not demonstrate a well-founded rationale of the square footage projection that is the basis for the rental/lease budget and whether the square footage expectation, and thereby the rental/lease budget, are sufficient to create a learning environment reflective of a successful Academic Plan.

There are several concerns whether Contingency Plans are sound:

- Contingency plan in Year 0, to delay professional development until the July 2020 per pupil distribution, is concerning. This plan would seem to increase Year 1 expenses rather than decrease or eliminate an expense altogether and there is concern whether the Year 1 budget could absorb the additional expenses, of hiring a trainer for the professional development as well as the salary costs to pay teachers to attend the training, which appear to exceed the amount of Net Assets At End of Year 1.
- Items 3 through 5 of the Donation In Kind Possibilities, in the Year 0 Contingency Actions, are not sound contingency plans as no supports for these assumptions are provided.

• The contingency plan does state that a contingency would be to increase student enrollment to increase funding. Pre-opening schools should be cautioned when they consider accepting more students to make up for lower than anticipated funding. Additional students potentially require larger facilities, more staffing, and higher costs for other programs (such as food service or transportation). Additional students may also make implementing the academic, organizational, and financial plans provided in the application more difficult.

V. Applicant Capacity

The applicant's capacity is evaluated based on the applicant's individual and collective qualifications (including, but not limited to, documented and relevant credentials and experience reflected in the resumes of all members) and the applicant's demonstrated understanding of challenges, issues, and requirements associated with running a high-quality charter school (including, but not limited to, the application and Capacity Interview responses).

Section V.A: Academic Plan Capacity		
Meets the Standard	Does Not Meet the Standard	
Rationale:		
Applicant did not meet the standard for four out of five c	riteria below.	
Criterion V.A.1		
 Evidence that the key members of the proposed school's academic team have the collective qualifications and capacity (which may include, but is not limited to, documented and relevant credentials and experience reflected in the resumes of all members and an understanding, as demonstrated by the application responses, of challenges, issues, and requirements associated with running a <i>high-quality charter school</i>) to implement the school's Academic Plan successfully. The evidence must include a description that: a. Clearly identifies the key members of the applicant's academic team that will play a substantial role in the successful implementation of the Academic Plan, including current or proposed governing board members, school leadership or management, and any essential partners who will play an important ongoing role in the proposed school's development and operation; and 		
	ollective qualifications for implementing the proposed sufficient capacity in areas such as school leadership,	

school's Academic Plan successfully, including sufficient capacity in areas such as school leadership, administration, and governance; curriculum, instruction, and assessment; performance management; and parent or guardian and community engagement.

	□ Meets the Standard 🛛	I Does Not Meet the Standard
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Rationale:

The proposal lists governing board members and advisors that are necessary for the school to be successful in implementing the academic plan. However, according to the project management plan, the proposed school principal will be taking the lead in implementing curriculum and the development of the educational program. The proposed school principal exhibits undemonstrated capacity and ability since her resume does not indicate that she has the range of experience and skills necessary to implement curriculum and develop the educational program. Her resume states that she "developed the DreamSmart curriculum and program that incorporates project based learning and structures of the Conscious Discipline framework" and "implemented it at a local private school that included developing and facilitating the training and professional development for the school's teachers and headmaster." She also "developed a wrap-around support system to compliment the workshop sessions and supported the teachers in the classroom." However, she stated that the majority of her teaching experience has been through substitute teaching and after-school programs.

The applicant's responses appeared to indicate that Social Emotional Learning would be embedded in the curriculum along with problem-based learning to develop entrepreneurial skills. When questioned about curriculum, the applicant stated that PBL units would be created once the application was approved and would be field-tested during summer and intersession breaks during the year leading up to the school opening. These opportunities would be offered for a fee and would serve the purpose of showcasing IMAG's curriculum to interested families as well as field testing the curriculum for the coming year. Content standards and the incorporation of identified curricular/program materials was not addressed.

Criterion V.A.2

A description of the academic team's clear ties to and/or knowledge of the community in the geographic area where the facility is or will be and/or areas where the anticipated student population will come from.

Meets the Standard	Does Not Meet the Standard	
Rationale:		
The applicant has an understanding of the community and expects that there would be a number of students that are receiving free/reduced lunch and/or are English Language Learners. However, knowing the projected student population, the applicant, through its plans, has not demonstrated that it would be able to serve these students. The applicant did not present a plan or budget for meals for students eligible for free and reduced lunch, even though it acknowledged that a significant number of its students would be eligible. It is questionable if the school would be able to recruit these students if the school does not offer meals.		
Criterion V.A.3		
Criterion V.A.3 A description that identifies any organizations, agencies, or consultants that are essential partners to the successful planning and establishing of the proposed school and/or implementation of the Academic Plan; explains the current and planned roles of such essential partners and any resources they have contributed or plan to contribute to the proposed school's development; and includes evidence of support, provided as Attachment U (no page limit) (such as letters of intent or commitment, memoranda of understanding, and/or contracts), from such essential partners demonstrating these partners are committed to an ongoing role with the proposed school, if applicable.		
Meets the Standard	🛛 Does Not Meet the Standard	
Rationale: Applicant does not describe the current or planned roles contributed or plan to contribute to the school's develop		
Criterion V.A.4		
School Director.	he could and to be a stand as some the above states.	
Submit a position description for the school director. T		
description as Attachment W (required attachment, no page limit). The position description shall include:		
description as Attachment w (required attachment, no	page limit). The position description shall include:	
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run an organization and to have good management. During the Capacity Interview, the proposed school director was asked about why there was an emphasis on project management skills instead of academic experience. The proposed school director emphasized that the project management skills are important because of the start-up nature of the school, and that she has classroom experience substitute teaching and in working in after school programs. While the proposed school director's project management and project implementation experience will be useful in starting a school, these skills alone are not sufficient to meet the standard of a school director who has the experience to design, launch and lead a high quality charter school. The job description of the school director as presented in the application allows for the school director to lack the experience necessary to have a sound working knowledge of school operations.

Criterion V.A.5

Management Team.

Submit position descriptions for a business manager and registrar (or positions that will carry out the duties of a business manager and registrar). These positions will make up the proposed school's leadership or management team beyond the school director. The applicant is required to provide the position descriptions as Attachment Y (required attachment, no page limit). The description must include:

- a. The job description, responsibilities, characteristics, and qualifications for the business manager and registrar. The position description shall include rigorous criteria that is designed to recruit individuals for these positions that have the experience and ability to perform the duties of each position.
- b. A timeline that aligns with the proposed school's start-up plan and a comprehensive plan for a thorough recruiting and selection process where candidates will be screened using rigorous criteria.

Submit Attachment X (required attachment, no page limit) to indicate that the business manager and registrar is known or unknown at the time of the application.

c. <u>If known</u>, identify the individuals who will fill these positions and provide, as Attachment X (required attachment, no page limit), the resumes for these individuals as evidence that the individuals demonstrate the qualifications, capacities, and commitment to carry out their designated roles to ensure the success of the proposed school.

Meets the Standard	Does Not Meet the Standard
Detionale	

Rationale:

The applicant's use of Ho'okako'o for human resources management and accounting functions is beneficial to the proposed school. The applicant also plans to hire a registrar, academic coach, counselor, and student services projects coordinator.

Section V.B: Organizational Plan Capacity		
Meets the Standard	Does Not Meet the Standard	
Rationale:		
The applicant did not meet the standard for one out of tw	vo criteria sections below.	
Criterion V.B.1		
Evidence that the key members of the proposed school's	s organization team have the collective qualifications	
and capacity (which may include, but is not limited to, documented and relevant credentials and experience		
reflected in the resumes of all members and an understanding, as demonstrated by the application responses,		
of challenges, issues, and requirements associated with running a high-quality charter school) to implement the		
school's Organizational Plan successfully. The evidence must include a description that:		
a. Clearly identifies the key members of the applicant's organization team that will play a substantial role		
in the successful implementation of the Organizational Plan, including current or proposed governing		
board members, school leadership or management, and any essential partners who will play an		

important ongoing role in the Organizational Plan; and

b. Describes the organization team's individual and collective qualifications for implementing the proposed school's Organizational Plan successfully, including sufficient capacity in areas such as staffing, professional development, performance management, general operations, facilities acquisition, development (such as build-out or renovations), and management.

□ Meets the Standard

Does Not Meet the Standard

Rationale:

The proposed school leader determined the average size of the school's classroom would be 500 square feet based on her measurement of a classroom at Waipahu High School. The reviewers, however, believe that classrooms of this size would not be sufficient to deliver the instruction in the methods that would be chosen for the school.

Criterion V.B.2

A description that identifies any organizations, agencies, or consultants that are essential partners in planning, establishing, or implementing the proposed school's Organizational Plan; explains the current and planned roles of such partners and any resources they have contributed or plan to contribute to the proposed school's development of its Organizational Plan; and includes evidence of support, included in Attachment U (as referenced in <u>Criterion V.A.3</u>), from such essential partners demonstrating these partners are committed to planning, establishing, and/or implementing the Organizational Plan.

🛛 Meets the Standard	Does Not Meet the Standard

Rationale:

The applicant's use of Ho'okako'o for human resources management and accounting functions is beneficial to the proposed school.

Section V.C: Financial Management Capacity			
Meets the Standard	Does Not Meet the Standard		
Rationale:			
The applicant did not meet the standard for one out of two criteria sections below.			
Criterion V.C.1			
Evidence that the key members of the proposed school's financial team have the collective qualifications and capacity (which may include, but is not limited to, documented and relevant credentials and experience reflected in the resumes of all members and an understanding, as demonstrated by the application responses, of challenges, issues, and requirements associated with running a <i>high-quality charter school</i>) to implement the school's Financial Plan successfully. The evidence must include a description that:			
 a. Clearly identifies the key members of the applicant's financial team that will play a substantial role in the successful implementation of the Financial Plan, including current or proposed governing board members, school leadership or management, and any essential partners who will play an important ongoing role in the proposed school's Financial Plan; and b. Describes the financial team's individual and collective qualifications for implementing the proposed school's Financial Plan; and b. Describes the financial team's individual and collective qualifications for implementing the proposed school's Financial Plan; and 			
Meets the Standard	Does Not Meet the Standard		
Rationale:			
The governing board treasurer and another governing board member with fundraising experience are listed as the			
members that will carry out the financial plan. The governing board treasurer of the proposed school is			
	knowledgeable about financial management. However, this experience of the treasurer may need to be		
supplemented with a deeper undertstanding of the financial management aspects of a school. The school may			

need the assistance of Ho'okako'o to help operate the financial aspects of the school.

Criterion V.C.2

A description that identifies any organizations, agencies, or consultants that are essential partners in planning, establishing, or implementing the proposed school's Financial Plan; explains the current and planned roles of such partners and any resources they have contributed or plan to contribute to the proposed school's development of its Financial Plan; and includes evidence of support, included in Attachment U (as referenced in <u>Criterion V.A.3</u>), from such essential partners demonstrating these partners are committed to planning, establishing, and/or implementing the Financial Plan.

Meets the Standard	Does Not Meet the Standard

Rationale:

Ho'okako'o will be involved in preparing financial statements, records but not in the planning and execution of the proposed school's budget.