# State Public Charter School Commission 2018 Recommendation Report

Charter Application for
**Kūlia Academy**

***Academic Plan, Organizational Plan, and Financial Plan Evaluation***
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***Academic Capacity, Organizational Capacity, and Financial Capacity Evaluation***
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# 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 **Appendix A**, provides details on the Evaluation Team's assessment of the applicant's proposal when reviewed against the evaluation criteria.

# Proposal Overview

**Proposed School Name**
Kūlia Academy

**Mission and Vision (as described by the applicant)**
Mission:  *"To prepare a diverse student population for success in college and beyond, especially in the interaction of Science and Humanities. Our goal is to educate contributors to society, by offering a comprehensive learning experience designed to serve the needs of our students, through effective site-based instruction, rich hands-on learning, and foundation skills presented in ways that are relevant and inspiring for our students. The school will particularly try to recruit and meet the needs of socioeconomically disadvantaged and minority students."*

Vision:  *"Graduates of Kūlia Academy are scientific thinkers who contribute to the global community as socially responsible and educated members of society."*

**Geographic Location (as described by the applicant)**
*"If approved, Kūlia Academy will serve students primarily in west Honolulu, Pearl City, Waipahu and East Kapolei. While searching for a suitable facility, we aim to locate our school close to Honolulu Rail Project, which is scheduled to open in October 2020 coinciding with our school opening, providing easy access to our low-income students and parents through public transportation."*

**Anticipated Student Population (as described by the applicant)**
*"We are expecting a high percentage of minority students, a higher than 50% Free and Reduced Lunch ratio with about 12% ELL and 10% Special Education students. Through our comprehensive educational program and support system, we plan to address the needs of this high need student population efficiently. Through our data-driven instruction model, we aim to track every student individually and make sure every single one of our students make progress through their college and career goals."*

**Contribution to Public Education System (as described by the applicant)**
*"The families of Honolulu County deserve a rigorous, college preparatory school for their children. Our target student population do not only need a comprehensive and effective curriculum, they also need guidance and support mechanisms to ensure they understand and get motivated towards aiming and achieving high. Our school model aligns instruction with college-readiness and Common Core standards and uses high-quality assessments to ensure students are developing the academic skills that they will need for a successful college education and career. By focusing our efforts on understanding and serving the needs of our economically disadvantaged students, we aim to remove barriers to a high quality college education for the underserved communities that we serve. We plan to achieve these results through a strong college-bound culture based on high expectations for our students. Kūlia's College Program provides the resources that low-income, minority students need to attain a college education, which is not fully achieved for many low-income, minority students at current public school settings.*

*We are planning to help address Priority I as detailed in SPCSC's 2018 RFP:*
*I. New schools that would provide additional school capacity in geographic areas*

*where existing public schools are already exceeding, have already reached, or are projected to reach or exceed full enrollment capacity*

*Currently, two area high schools, James Campbell High and Kapolei High, are suffering due to rapid increase in their numbers of students. Kūlia Academy will help address this problem by offering additional seats for the area students. By locating our school close these two high schools (Pearl City, Waipahu, East Kapolei area) and by being close to Honolulu Transit Project and by offering attractive college-prep programs, Kūlia Academy will attract students who would otherwise attend these two schools."*

**Enrollment Summary (as described by the applicant)**

| Grade Level | Number of Students | | | | | | | | | | | |
| --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- |
| | Year 1 2020 | | Year 2 2021 | | Year 3 2022 | | Year 4 2023 | | Year 5 2024 | | Capacity 2025 | |
| 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 |
| K | 60 | | 60 | | 60 | | 60 | | 60 | | 60 | |
| 1 | 20 | | 60 | | 60 | | 60 | | 60 | | 60 | |
| 2 | 20 | | 20 | | 60 | | 60 | | 60 | | 60 | |
| 3 | | | 20 | | 20 | | 60 | | 60 | | 60 | |
| 4 | | | | | 20 | | 20 | | 60 | | 60 | |
| 5 | | | | | | | 20 | | 20 | | 60 | |
| 6 | 48 | | 48 | | 48 | | 48 | | 48 | | 72 | |
| 7 | 72 | | 72 | | 72 | | 72 | | 72 | | 72 | |
| 8 | | | 72 | | 72 | | 72 | | 72 | | 72 | |
| 9 | | | | | 72 | | 72 | | 72 | | 72 | |
| 10 | | | | | | | 72 | | 72 | | 72 | |
| 11 | | | | | | | | | 72 | | 72 | |
| 12 | | | | | | | | | | | 72 | |
| **Subtotals** | 220 | 0 | 352 | 0 | 484 | 0 | 616 | 0 | 728 | 0 | 864 | 0 |
| **Totals** | 220 | | 352 | | 484 | | 616 | | 728 | | 864 | |

# Executive Summary

Kūlia Academy

**Recommendation**

**Summary Analysis**

It is recommended that the application for Kulia 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. The academic plan provides very little detail in that it describes *what* the school plans to do, however it does not provide information regarding *how* it will be accomplished. Also, the Applicant gave no indication in the application or the clarification interview that it took steps to ensure that these plans and processes are directly implementable in the target community without any modification or adaptation.

The organizational plan does not meet the standard for approval since many sections lacked information or sufficient detail and did not demonstrate thorough preparation and often failed to present a clear picture of how the school expects to operate.

The financial plan does not meet the standard for approval because the Applicant has not provided a complete, realistic, and viable start-up and three year operating budget. Exclusions and incomplete costs render the Financial Plan unreliable and unsound, which affects the viability of the application as a whole.

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. The proposed School Director has undemonstrated capacity to lead a new charter school since much of his professional background is not at the school administrator level. The applicant has also not demonstrated that it clearly understands the community that it would like to serve.

**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

**Financial Plan**

Does not meet the standard

**Organizational Plan**

Does not meet the standard

**Evidence of Capacity**

Does not meet the standard

# Academic Plan

Kūlia Academy

**Rating**

**Does not meet the standard for approval**

This section of the application contains eight sub-sections. Kūlia Academy's application received ratings for five 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 | ✘Does not meet the standard for approval |
| C. Special Populations and At-Risk Students | ✘Does not meet the standard for approval |
| D. School Culture | ✘Does not meet the standard for approval |
| E. Professional Culture and Staffing | ✘Does not meet the standard for approval |
| F. School Calendar and Schedule | ✘Does not meet the standard for approval |
| G. Supplemental Programs | *Not applicable* |
| H. Conversion Charter School Additional Academic Information | *Not applicable* |

**Analysis**
Because Kūlia Academy's application did not meet the standard for approval for any of the five rated sub-sections, **the Academic Plan does not meet the standard for approval.**

The Academic Plan includes very little detail -- although the application describes *what* the school plans to do, there is little to no information provided regarding *how* it will be accomplished (see Appendix A). For example:

- The application describes the data that faculty and staff will look at, but not how instructional leaders and teachers will use these data to inform instructional practice and the academic program or the roles and responsibilities of the instructional leadership team in helping teachers to support their students' progress and to make adjustments to instruction.

- The application states that "Kūlia Academy will address the interests, background, and challenges of its target student population in the following ways: co-teaching; embedded

supports; differentiated instruction; home-school connection; and specific supports for English learners, immigrant students, and foster youth," but does not describe any interventions or modifications that will be made to instructional strategies if students are not meeting identified goals and targets. Furthermore, in the clarification interview, the Applicant was unable to provide any additional detail.

There are also numerous sections of the application that contain content that is identical or nearly identical to content from charter school applications for several Magnolia Science Academies, which are located in California -- specifically, the sections regarding the school's:
1. mission;
2. plan for reviewing and updating the school's academic goals and targets;
3. plan for serving educationally disadvantaged students, one of the school's target populations;
4. hiring process;
5. formal teacher observation/evaluation process; and
6. classroom walkthrough procedure.

In addition to not citing the content as having originated with Magnolia Science Academies, the Applicant gave no indication in the application or the clarification interview that it took steps to ensure that these plans and processes are directly implementable in the target community without any modification or adaptation, such as:
● researching the needs of the target community on Oahu,
● reviewing the collectively bargained agreements that apply to charter school personnel in Hawaii, or
● conducting a comparative analysis of the target community and the California communities served by the Magnolia Science Academies.

The Applicant also did not provide any evidence regarding whether the selected Magnolia Science Academies' plans and processes, which the school will essentially be replicating, have been proven effective.

The Evaluation Team commends the Applicant for their willingness to serve keiki in Hawaii -- there is no doubt that countless hours were logged in pursuit of opening a new charter school on Oahu. Nonetheless, the lack of attention given to the relevance of the Academic Plan to the target community, coupled with a notable lack of familiarity with both the target geographic area and target student population, raises questions regarding whether the plan is viable as described or likely to be as effective as anticipated:
● How can a school assess the needs of a particular community if it cannot accurately locate it?
● How can a school understand the needs of a particular community if it has not actively engaged in dialogue with its members?
● How can a school effectively serve a particular community if it is unfamiliar with its members and their needs?

These questions and an insufficient level of detail provided in both the application and clarification interview prevent the Evaluation Team from being able to determine whether the Academic Plan is sound and appropriate to implement in the target community, and indicate that the plan has not met the standard for approval.

# Organizational Plan

Kūlia Academy

**Rating**

**Does not meet the standard for approval**

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

| Section III. Organizational Plan - Sub-sections | Rating |
|---|---|
| A.  Governance | ✘Does not meet the standard for approval |
| B.  Academic, Financial, and Organizational Performance Management | ✘Does not meet the standard for approval |
| C.  Ongoing Operations | ✘Does not meet the standard for approval |
| D.  Student Recruitment, Admission and Enrollment | ✘Does not meet the standard for approval |
| E.  Geographic Location and Facilities | ✘Does not meet the standard for approval |
| F.  Start-Up Period | ✘Does not meet the standard for approval |
| G.  Conversion Charter School Additional Organizational Information | *Not applicable* |
| H.  Third Party Service Providers | *Not applicable* |

**Analysis**
**The Organizational Plan does not meet the standard for approval** as the application did not meet the standard for approval for any of the six rated sub-sections sections.  Overall, many sections lacked information or sufficient detail and did not demonstrate thorough preparation; often, the Applicant failed to present a clear picture of how the school expects to operate.  Specifically, there are serious concerns regarding:
- the governance structure, including legal and conflict of interest matters;
- an undeveloped facility plan, including research, timeline projections and square footage estimations; and
- concerns over the viability of the Start-up Plan.

**Weakness in the Governance Structure**
Operation of the school by a nonprofit organization
The plan for the governance structure of the proposed school is not in compliance with the governing statute for charter schools in Hawaii, and does not reflect a thorough understanding of key issues. The application states Kūlia Academy "will be operated by a nonprofit organization;" however, the statute that governs charter schools in Hawaii only allows a nonprofit organization to operate a conversion charter school, not a start-up charter school, which Kūlia Academy would be. The Commission cannot approve a charter application whose proposed governance structure does not comply with state law.

Potential conflicts of interest due to shared nonprofit and school governing board
During the clarification interview, the applicant governing board explained that the nonprofit board is the applicant governing board and that, once the school begins operation, the school governing board will comprise the nonprofit board, plus others. This shared membership is a serious concern, as this type of relationship could pose actual or perceived conflicts of interest. A review by the State Ethics Commission is also required to determine whether this arrangement would be in compliance with the State Ethics Code.

Concerns over an an effective governance structure
There is a concern whether there will be an effective governance structure at Kūlia Academy. Kūlia Academy describes the governing board's role as "The Board is responsible for hiring and supervising the School Principal…The Board approves major school and Kūlia policies, and budgets for Kūlia Academy." In attachment Q "The Board will discharge its power and responsibility by functioning primarily as a policymaking body." During the clarification interview applicant board members reinforced the application, reporting that the governing board will dictate school policy, but not micromanage the school, and will oversee school finances. Unfortunately, in both response opportunities there was clearly a focus of the governing board on policy and financial oversight but no mention of the governing body's responsibilities regarding academic success. Neither response describes a governance structure that fosters an active oversight and evaluative role of the governing board. Rather, the clarification interview made it clear that the governing board will not micromanage the school, and while the board did not provide to what extent it will take a hands-off approach, the responses do not provide confidence in the weak role of the governing board, nor any assurance that it will hold the school accountable to organizational, financial, and academic success

Role of the Principal invites conflicts of interest issues
There are serious concerns over the Principal as "manager", to both the school board and the school as it appears the Principal will run both the decision-making body of the school, as well as the school itself. There are deep concerns for a plan in which the individual will manage both. In combination with this board's role as "policymaking body" there are serious concerns for a weak governance structure, as well as an oversight model that facilitates conflicts of interest.

**Weakness in the Facilities Plan**
The plan is insufficiently detailed and is neither comprehensive, reasonable, nor sound. The Applicant stated that it located three potential facilities, but did not provide any further information, such as addresses, square footage, amenities, previous use, or any assessments for bringing the buildings into compliance for use as a school. Not only does the response not meet the criteria, the lack of detail and needed information does not provide enough specific information to show a thorough preparation. Without details to support the school's facility estimations, it is unclear whether the applicant conducted sufficient research into the targeted location to determine whether there are feasible

possibilities for a school facility.  For example, a range of square footage is provided but no explanation of what the basis of the numbers is.  This would be the same for renovation costs and the facility timeline.  The succinct response does not inspire confidence in the Applicant's capacity to identify, renovate, and lease a school facility and further, if the proper research has not yet been conducted the charter should not be approved at this time.

**Weakness in the Start-up Plan**
While the Implementation Plan lists activities and targeted timelines for implementing the school, there is a concern for the viability of the plan. The Principal of Kūlia Academy will work as a volunteer until April 2020 and this person will be the sole individual responsible for all tasks and activities listed in the Implementation Plan.  There is a concern that the board will only act as a guide for fiscal management, compliance, and reporting (Attachment Q), and not take on responsibility for any of the implementation activities to open the school.  The appearance that the board will act as a delegation body only is reinforced by its plan to meet merely six times, or every other month, during the start-up phase. The board is described as "an exemplary team to lead the school through this project during the critical implementation phase," yet it appears that it will not utilize the skills of its listed members to assist in the implementation of the project.  Unfortunately, this does not inspire confidence in the applicant's capacity to carry out its plan effectively.

Every new charter school that has been authorized by the Commission has reported that start-up and implementation were significantly more difficult than expected.  For this reason, the Commission has placed a strong emphasis on need for the Applicant's to demonstrate that a capable team and committed board will carry out the plan.  The failure of the Applicant to identify more than one individual to address all the activities of the Implementation Plan exposes a key weakness that plagued the Organizational Plan section.  The governing board is repeatedly referenced in a passive role, and seemingly is comfortable to delegate its responsibilities over to the school principal.  As such, the Applicant failed to present itself as a group collectively working to launch a school, and that all individuals have an equal interest.  It appears that the Applicant is not adequately prepared to open and successfully run a charter school at this time.

# Financial Plan

Kūlia Academy

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

| Section IV. Financial Plan - Sub-sections | Rating |
|---|---|
| A.    Financial Oversight and Management | ✔ Meets the standard |
| B.    Operating Budget | ✘ Does not meet the standard for approval |

**Analysis**

Because Kulia Academy's application did not meet the standard for approval for the Operating Budget sub-section, **the Financial Plan does not meet the standard for approval.** Specifically, the Applicant has not provided a complete, realistic, and viable start-up and three year operating budget.  Exclusions and incomplete costs render the Financial Plan unreliable and unsound, which affects the viability of the application as a whole.  Incomplete or excluded items in the Financial Plan include, but are not limited to:

- Staffing costs,
- Costs for promotional materials printed in multiple languages,
- Renovation and facility improvement costs,
- Costs for experienced teachers capable of teaching AP-level courses, and
- A contingency plan should funding be lower than expected.

The budget submitted does not correlate to the staffing plan (Attachment F).  In the budget, the applicant does not report the salaries for the assistant school directors for any of the budget years. According to the staffing plan, the school will have three assistant school directors by Year 2 -- the Dean of Academics, the Dean of Culture, and the Dean of Students -- with an annual salary of $62,000 (a total of $186,000).  The costs for the assistant school directors' salaries cannot be found in the budget.  To further complicate matters, the costs reported on the staffing plan ($1,482,000) differ from the actual total cost of listed salaries in the staffing plan by $60,000 (the actual cost is $1,542,000).

In addition, the staffing plan itself contains errors in the number of full time employees (FTEs) accounted for.  For example, in Year 1, the total FTEs on the staffing plan says 16.5; however, the actual number of employees listed in the plan is 18.  For Year 2, the total FTEs on the plan says 27, however, the actual number of employees listed is 29.  The staffing plan is further convoluted as two part-time educational assistants are included in the narrative proposal and annual budgets, but not in the staffing plan.

Year 2 presents a clear example of the lack of cohesion and correlation of the budget with other aspects of the application.  As previously stated, the total count of FTEs provided in the staffing plan is 27; however, the actual number of employees listed in the staffing plan is 29, and the FTE count in the annual budget is 28.5.  Because the Applicant provided three different numbers for the Year 2 FTE count, the evaluation team was unable to correlate the salary costs listed in the budget with the staffing plan, even with the $60,000 discrepancy factored in.

Since personnel costs account for at least 60 percent of the total budget for each budgeted year, the lack of cohesion and accuracy of the personnel costs raises concerns pertaining to the reliability and viability of the budget as a whole.  At capacity (Year 6 of operation), the proposed school projects to have 68 to 69 employees; using the information provided in the staffing plan, the discrepancy in personnel costs totals $118,000.

These discrepancies invalidate the Applicant's budget and raise questions regarding the school's financial health and viability, as well as the Applicant's current procedures regarding fiscal reporting and management.  During the clarification interview, the governing board president stated that the application was reviewed and edited multiple times by the applicant governing board before being submitted; however, the application was submitted despite these errors.  This raises concerns regarding the board's fiscal experience and capacity.

In addition to these errors, other concerns in the budget include staffing costs for teachers budgeted at $51,000 to $53,000 for each teacher in Years 1 through 3 of the budget.  Based on the salary schedule for Hawaii public school teachers, the school would be limited to hiring teachers whose qualifications or experience are at the lower levels, which raises doubts as to whether the school would be able to attract experienced teachers capable of implementing the rigorous college preparatory model envisioned and teaching the desired number of AP classes.  The budget for teacher salaries would only allow the school to hire three types of teachers, one of which is teachers who are unlicensed, have not completed a State Approved Teacher Education Program, and would only be eligible for an emergency hire permit.

The Applicant has also not provided a sound contingency plan in the event that funding is lower than anticipated or if enrollment goals are not met.  The contingency plan relies on budget surpluses rather than cutting costs; according to the Applicant, if the school enrolls 10 students less than projected, the school would still be able to function with little negative impact due to a surplus of approximately $125,000.  Due to the unreliability of the budget, it is impossible to determine the accuracy of this projected surplus or whether there will even be a surplus.

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 provide for a sound system.  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 and school administration.

# Evidence of Capacity

Kūlia Academy

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

| Section V. Applicant Capacity - Sub-sections | Rating |
|---|---|
| A.   Academic Plan Capacity | ✗ Does not meet the standard for approval |
| B.   Organizational Plan Capacity | ✗ Does not meet the standard for approval |
| C.   Financial Plan Capacity | ✗ 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 has not met the standards for academic, organizational, and financial capacity.  The applicant does not exhibit academic capacity since much of the implementation of the academic plan will rest with the Dean of Academics position, and the School Director position.  Given that the starting a new charter school will present itself with many challenges, it is unreasonable for two people to handle a wide range of duties (hiring faculty, leading professional development, overseeing curriculum, fiscal management, building community relationships) in the school's first year of operations.  Furthermore, the School Director has undemonstrated capacity to lead a new charter school since much of his professional background is not at the school administrator level.

The applicant does not exhibit organizational capacity and has shown that it does not know about the community it wishes to serve. There is concern that the proposed school is based on a model that worked on the mainland, but did not take into account how it would serve a community with characteristics that are unique to Hawaii. This was evidenced by plans to mail school marketing materials to households in in Spanish, even though it is not commonly spoken in Hawaii.  Additionally, the applicant could not be specific about the location of the school and instead, stated that it would be "near the rail line." The applicant (who will offer grades K-12 at capacity) is pursuing a school location in an area that already has an innovative school in Waipahu High School which has a program that allows students to take college courses while in high school.  This is similar to the applicant's model which encourages students to attend college after high school.

The applicant does not exhibit financial capacity since the proposed school's financial team has an

undemonstrated ability to implement the financial plan because it does not have experience starting a charter 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 Lānaʻi High and Elementary School, Saint Louis School and McKinley Community School for Adults.  Ms. Evans taught at Lānaʻi 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 pre-opening/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**

**Kūlia 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 any of the criteria in this section (seven 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 |
| --- | --- |

**Rationale:**
- Criterion asks for a description of course outcomes, for each course, at each grade level.  School will service grades K-12 but the response does not include all student courses at Kūlia Academy for each grade.  The simple table listing Math, English, Science, Social Science, which are general teaching fields not student courses, is vague and does not provide confidence that minimum state standards for each grade level will be met.  Regarding outcomes, the response simply lists CCSS, Next Generation Science Standards, Hawaii Content and Performance Standards III under "Outcomes", which is not a clear description of course outcomes and does not reflect a thorough understanding of curriculum or instructional design.

**Criterion II.B.2**
**A clear description of the rigorous academic standards that will be used at the proposed school including:**
  a. **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**

| **b.** 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 provides a rationale for including the selected standards (i.e., they were selected by the DOE, UH, or College Board), but does not demonstrate understanding of how the standards will contribute to student success under the Academic Plan. The response appears to be a simplified re-statement of minimum student expectations, rather than a description of any rigorous academic standards at Kūlia Academy.

- The school plans to use curricula that are aligned with identified standards (e.g., Eureka Math and Expeditionary Learning are aligned with CCSS); however, for some content areas (i.e., Social Science, Art, Health, Physical Education, World Languages, all high school courses), no curriculum has been identified or developed at this time.

- No mention of how curricula will be aligned with instruction, formative and summative assessments, or grading and reporting of student progress.

| **Criterion II.B.3**<br>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:**

- According to II.A.1: Academic Plan Overview, instructional materials have already been selected, and according to II.B.2: Description of the rigorous academic standards that will be used at the proposed school, "Most of the instructional materials that we will use have already been aligned with the standards we mentioned above," so this section should include a description and explanation that clearly demonstrates how the materials support the Academic Plan; however, it does not.

| **Criterion II.B.4**<br>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** |

**Rationale:**

- No description of how the proposed school will assess the progress of students (aggregated or disaggregated) on three of the school's four academic goals: high school graduation and college enrollment goals and the Strive HI measures that are not based on statewide assessment data (i.e., chronic absenteeism, 9th grade promotion rate, percentage of CTE completers, four-year graduation rate, college-going rate).

- No explanation how the identified formative assessments will measure progress toward the statewide assessment performance goals.

- The application states that "The school will meet or exceed the Strive HI growth targets annually," but Strive HI does not have annual targets (instead, it has statewide targets for 2020); thus, the school is missing targets for any year other than school year 2019-2020.

  For info about the DOE's Strive HI statewide targets, see the DOE website:
  http://www.hawaiipublicschools.org/VisionForSuccess/AdvancingEducation/StrategicPlan/Pages/SPDR-1ach.aspx

- The application states that "The progress of special needs and EL students will be monitored using the state tests, MAP tests, teacher evaluations (based on teacher-designed tests and performance on class work and homework), and parent input." No mention of using WIDA ACCESS data for ELs, even though all Hawaii public schools are required to administer this assessment to all ELs annually (requirement in place since SY 2009-10).

  DOE webpage about its EL program:
  http://www.hawaiipublicschools.org/TeachingAndLearning/StudentLearning/Multilingualism/Pages/EL.aspx

**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 application describes the data that faculty and staff will look at, but not *how* instructional leaders and teachers will use these data to inform instructional practice and the academic program or the roles and responsibilities of the instructional leadership team in helping teachers to support their students' progress and to make adjustments to instruction.

**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 *virtual* or *blended learning program*, 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 | ☒ Does Not Meet the Standard |
|---|---|

**Rationale:**
- No description of why the selected instructional strategies are well-suited to the anticipated student population.

- The application states that "Kūlia Academy will address the interests, background, and challenges of its target student population in the following ways: co-teaching; embedded supports; differentiated instruction; home-school connection; and specific supports for English learners, immigrant students, and foster youth," but does not describe any interventions or modifications that will be made to instructional

strategies if students are not meeting identified goals and targets.  In the clarification interview, the Applicant Team was unable to provide any additional detail.

- Inconsistent description of the role of teachers in the development of curriculum: the application states that "Teachers will design inquiry-based instruction for diverse learners…;" however, other sections of the application make conflicting statements, specifically:

  From I.A.4: Key components of the educational model:
  "We aim to incorporate comprehensive inquiry-based programs instead of leaving it only to teachers to produce engaging projects, as they are challenged by lack of time or experience."

  From II.A.1: Academic Plan Overview:
  "When available, this inquiry-based model will be implemented with comprehensive programs already designed with an inquiry-based approach in all lesson plans and activities, not only with general teaching methods or asking teachers to modify their approaches in the classroom."

  "Kūlia Academy teachers will devise lesson plans to engage students through inquiry-based learning and critical thinking using the abundant resources available online."

  From II.B.6: Instructional strategies, page 23:
  "Teacher-designed units will allow students to make necessary study-to-life correlations."

**Criterion II.B.7**
**Graduation Requirements.**
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:**

- The application does not describe how GPA will be calculated.

- The Kūlia High School Diploma does not appear to be necessary -- II.A.1: Academic Plan Overview states that "Students will meet and exceed Hawaii High School Graduation Requirements with completing at least 6 AP or Early College Courses," which would mean that all Kulia graduates would qualify for one of the school's two other types of diplomas (i.e., AP Capstone High School Diploma or Kūlia Honors High School Diploma).  However, in the clarification interview, the Applicant Team clarified that the AP/early college course requirement described in the application is actually a goal or expectation rather than a requirement.

- The graduation requirements for two of the school's three types of diplomas (AP Capstone High School Diploma and Kūlia Honors High School Diploma) differ from the BOE graduation requirements and these differences are an essential component of the school's Academic Plan, as described in II.A.1: Academic Plan Overview:

  "The mission of Kūlia Academy is "to prepare a diverse student population for success in college and beyond, especially in the interaction of Science and Humanities." The main focus of our program is AP

Courses and Dual Credit Programs. Our entire curriculum is developed around this purpose and the main goal of our elementary and middle school courses is to prepare students for AP and College-level courses in high school."

However, the application does not include a plan for adjusting graduation requirements (including any necessary adjustments to other components of the Academic Plan) in the event that the BOE does not grant a waiver from its policy.

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**Criterion II.B.8 (sub-criteria a through cc)**
**Virtual and Blended Learning.** If the proposed school's plan contains a *virtual* or *blended learning program*, as defined in the RFP:

a. **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:**

   i. **State the number of anticipated students that will access either a blended model, and/or a virtual program at your proposed school.**

      1. **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.**

   ii. **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 *blended learning programs*, 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.
l. 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 | ☒ Does Not Meet the Standard |
| --- | --- |

**Rationale:**
The application does not meet the standard for any of the criteria in this section (four 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 states that "Daily structured ELD program will be provided through Specially Designed Academic Instruction in English ("SDAIE") methodologies;" however, ELD and SDAIE are different and should not be employed simultaneously.

   See info from the California Department of Education's Migrant Education Resources and Best Practices Community Group:
   https://www.mydigitalchalkboard.org/portal/default/Content/Viewer/Content?action=2&scId=100031&scIld=7844

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

- Much of this section was taken directly from charter school applications for two different Magnolia Science Academies, both of which are located in California.  Unclear how the school's plan to serve educationally disadvantaged students and students with special needs will meet the needs of the target community when there is no indication in the application that the applicant has conducted any research into the needs of the target community, nor a comparative analysis of the target community and the communities served by the Magnolia Science Academies in order to ensure that the Magnolia Science Academies' plans are directly applicable to the target community and do not require any modification or adaptation.

This is of particular concern because the application states that the school "...is designed to support the underserved students in K-12 grades in Honolulu County." (I.A.3, page 3).

**Criterion II.C.2**
**For each 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 description of geographic area to be served is inconsistent: the application states that "Kūlia Academy will serve students primarily in west Honolulu, Pearl City, Waipahu and East Kapolei;" however, throughout the rest of the application, the area to be served is described as "Honolulu County" (A.3, A.6, A.7, E.1.b). In the clarification interview, the Applicant Team confirmed that the term "Honolulu County" (which they were not aware did not exist) was used in error and that they intended to refer to the area from Waipahu to Honolulu.

● In Section I, the application gives anticipated percentages of FRL, EL and SPED students at Kulia and cites the corresponding percentages for selected complexes (which are incorrectly labeled as "Complex Area"). There is no rationale provided for listing only 7 of the 13 complexes located in the school's targeted geographic area.

● The application describes the formative assessment data and assessment software that faculty will use to "individually track each student" and states that "Our faculty will develop interventions and methods to be used for individual students...in our grade level and subject level meetings," but does not describe the curriculum, daily schedule, staffing plans, instructional strategies, or resources that will be designed to meet the diverse needs of all students for any of the targeted educationally disadvantaged student subgroups.

- The third paragraph states that "Students from homes where a language other than English is spoken will be evaluated first through the Fall MAP test to determine their level of proficiency in English;" however, all Hawaii public schools are required to use the WIDA Screener to assess whether a student needs English language support services -- a charter school is not able to select its own EL screener.

    Info about the state's EL program from the DOE website:
    http://www.hawaiipublicschools.org/TeachingAndLearning/StudentLearning/Multilingualism/Pages/EL.aspx

- The staffing chart in Attachment F does not appear to include qualified staff adequate for the anticipated special needs population -- for example, it does not include a SPED teacher, Title I coordinator, or McKinney-Vento coordinator.

| **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 description of the supports and instructional strategies beyond special education that will support underperforming students in meeting and exceeding standards.** |

| ☐ Meets the Standard | ☒ Does Not Meet the Standard |
|---|---|

**Rationale:**
- The application describes the school's plan for "Identifying Low-Achieving Students Through Computer Adapted Tests," but makes no reference to the proposed curriculum or any elements of the Academic Plan (as described in II.A.1, pages 13-17), nor how the proposed curriculum and Academic Plan will accommodate the academic needs of students performing below grade level.

- The information provided is very general and lacks the necessary level of detail to determine whether the identified instructional strategies will successfully support underperforming students in meeting and exceeding standards.

    Examples from page 37:
    "For students achieving substantially below grade level, we will use educational materials that provide review and reteach programs."

    "...teachers teaching the same subject and the same grade level meet biweekly and discuss necessary changes in instruction such as reviewing some topics and implementing new strategies to help individual students according to MAP test results and parent conferences."

- The application states that "Through the Kūlia placement process, these students will be provided with the curriculum materials and teaching resources that are appropriate to their achievement level as a starting point for learning;" however, the application does not provide a description of this "placement process." The application mentions "appropriate" and "recommended placement" as strategies for meeting the needs of ELs specifically (II.C.1, page 30; II.C.2.c, page 34), but does not provide information regarding how the school will determine which placement is appropriate or recommended for a given student.

| **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:**

- No description of how the proposed school will identify students who would benefit from accelerated learning opportunities or how it plans to assess these students' needs.

- The application describes AP courses as "college-level courses," but does not describe how AP courses (or any other component of the proposed curriculum, such as early college, coding, and robotics courses) will accommodate those performing above grade level.

## Section II.D: School Culture

| ☐ Meets the Standard | ☒ Does Not Meet the Standard |
|---|---|

**Rationale:**
The application does not meet the standard for two out of the four criteria in this section, and the response to Criterion II.D.2 contains inaccurate information and assumptions.

**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 that is conducive to a safe learning environment for all students and how the proposed school will adequately identify, assess, monitor, and address the social, emotional, behavioral, and physical health needs of all students on an ongoing basis. The plan should explain the types of activities that the proposed school will engage in to create the school culture.

| ☐ Meets the Standard | ☒ Does Not Meet the Standard |
|---|---|

**Rationale:**
- The application does not mention anything about a safe learning environment or provide a plan for developing a school culture that will help to create one.

- The application references "the federal and state mandated physical fitness and health tests," but provides no further detail. In the clarification interview, the Applicant Team could not identify any federal or state mandated physical fitness and health tests and then confirmed that they had simply assumed that such tests existed, but did not research or verify this assumption prior to including the information in the application.

- The application states that "Kūlia Academy will continuously assess and monitor its students social, emotional and behavioral progress through its Student Information System and the PBIS system through ClassCraft as detailed in item 4 below."

  This does not appear possible using either system. The application states that "Positive Behavioral Interventions and Supports (PBIS) is a preventative approach that, on a school-wide level (SWPBIS), focuses more on identifying, acknowledging, and encouraging desired student behaviors than strictly punishing misbehaviors," but not identifying, assessing, monitoring, or addressing the health needs of students. Likewise, the student information system in the application is described as "…us[ing] the

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| discipline and attendance data from our student information system (SIS) system to analyze and inform decisions on how to improve student behavior and social/emotional skills" (II.B.5, page 22), and discipline and attendance data alone are insufficient to adequately identify, assess, monitor, and address the social, emotional, behavioral, and physical health needs of all students on an ongoing basis. |

**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:**

- The application provides information about parent and teacher workshops that will "…focus on issues such as social-emotional learning for students and the benefits of community partnerships," but does not connect school culture to any efforts to intentionally expose students to post-secondary educational and career opportunities.

**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 |
|---|---|

**Rationale:**

| Section II.E: Professional Culture and Staffing | |
|---|---|
| ☐ Meets the Standard | ☒ Does Not Meet the Standard |

**Rationale:**

The application does not meet the standard for any of the criteria in this section (four 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:**

- The application states that "The Dean of Culture fosters a school climate that supports the Kūlia Academy's vision and mission and builds effective relationships among teachers, parents, and the community to improve school culture. Please see Attachment Y for Dean of Culture's job description." However, no such plan is provided in either the application or the position description for the Dean of Culture in Attachment Y.

- The application indicates in multiple places that it expects to serve a high proportion of economically disadvantaged students, but does not provide 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.

**Criterion II.E.2**
**Professional Development**
**a. A clear description of the appropriate goals and data-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 |
|---|---|

**Rationale:**

- The description is very general and does not provide the requested information. Furthermore, the application states "Please see principal and teacher evaluation for further details on how we determine Professional Development needs;" however, the attachments for both the principal and teacher evaluations (Attachments G and H) state that the "…evaluation tool has not yet been developed."

- The application does not provide any information regarding how professional development topics will be identified, how the professional development plan will be driven by data to improve teaching and learning as well as school performance, or the process for evaluating the efficacy of the professional development, as requested.
- The description is very general and lacks the necessary level of detail to determine whether the professional development plan will successfully support the Academic Plan and is likely to maximize success in improving student achievement.

- The application does not provide any information regarding 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.

- No explanation provided regarding how the proposed school's calendar, daily schedule, and staffing structure accommodate the professional development plan.

- No mention of time scheduled for common planning or collaboration.

- Although application states that "Our instructional and professional days are in compliance with the collective bargaining agreement," this is not true. The application and Attachment I both describe 8 days of teacher professional development prior to the start of the school year; however, the current HSTA contract only allows for 4 days.

   From HSTA contract, page 57:
   ARTICLE XVI - WORK YEAR, B. NON-STUDENT DAYS

   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 person or position with the time, capacity, and responsibility for coordinating professional development is identified (Dean of Academics); however, there is no description of the skills and qualifications required for this position in Attachment Y, so cannot determine whether the person in this position will have the capacity to coordinate the school's professional development activities.

   Furthermore, in the clarification interview, the Applicant Team shared that a single person would serve as both the Dean of Academics and the Dean of Culture in Year 1, which, according to the position descriptions in Attachment Y, would make one person responsible for overseeing and monitoring student academic performance; curriculum and instruction; student management, supervision, discipline, and support; personnel management and evaluation; professional development; school culture; character education; and parent and community involvement. It does not appear that the person in this position will have sufficient time to coordinate professional development activities for the school.

- The plan provided for identifying ongoing professional development needs references "…principal and teacher evaluation for further details on how we determine Professional Development needs;" however, the attachments for both the principal and teacher evaluations (Attachments G and H) state that the "…evaluation tool has not yet been developed."

- No mention of funding or resources for implementing the professional development plan.

**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** |
|---|---|

**Rationale:**

- The staffing chart (Attachment F) does not clearly indicate all positions described in the application narrative (e.g., Deans of Academics, Culture, and Students).

- The total FTE counts in Attachment F are incorrect for all six years provided (see Excel).

- The total salaries in Attachment F are incorrect for three of the six years provided (Years 1, 2, and 6/Capacity -- see Excel).

- The notes in Attachment F do not provide any rationale for the staffing plan.

**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.

| ☐ Meets the Standard | ☒ Does Not Meet the Standard |
|---|---|

**Rationale:**

- The application states "Please see Attachment Q or our initial teacher recruitment plan;" however, Attachment Q does not contain the requested information regarding the 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, and any strategies, including compensation packages, that are likely to attract and retain high-performing teachers.

  The "Staff and Hiring" section of Attachment Q (page 3) only states the following:

  - In order to recruit new teachers, the Principal will start advertising on frequently visited websites such as www.craigslist.org, and the SPCSC's website by the beginning of January 2020.

- The "Hiring Process and Schedule" section is nearly identical to those from three Magnolia Science Academy charter school applications. There is no indication in the application that the applicant has conducted research into the realities of or legal requirements related to hiring school personnel in Hawaii, so it is unclear how the applicant has determined that the Magnolia Science Academies' plan is appropriate to implement/confirmed that it does not require any modification or adaptation.

- The firing process described in the application is unclear (page 52). Many steps are described, but their sequence is unclear; also, "expectations" are mentioned, but not described or explained.

- The firing process described in the application does not appear to be in compliance with the HSTA contract.

  From the HSTA contract, ARTICLE VIII - TEACHER PERFORMANCE (page 43):
  O. … A teacher whose unsatisfactory rating has been maintained through the grievance procedure as described in Article V [Grievance Procedure] shall be terminated.

- The "Formal Observations/Evaluations" and "Walkthroughs" sections are nearly identical to those from three Magnolia Science Academy charter school applications (see same applications referenced previously). There is no explanation why the applicant believes that the Magnolia Science Academies' plan is likely to produce or retain a successful staff at Kulia Academy or how the applicant has determined that the Magnolia Science Academies' plan is appropriate to implement/confirmed that it does not require any modification or adaptation.

- The evaluation plan does not cite any evidence or existing research supporting the effectiveness of utilizing the specified approach, including any evidence from the Magnolia Science Academies from which the "Formal Observations/Evaluations" and "Walkthroughs" sections were taken. If there is no evidence that the Magnolia Science Academies' plan has proven effective, then it is concerning that the applicant would seek to replicate it at Kulia Academy.

- Although the "Formal Observations/Evaluations" section is nearly identical to those from three Magnolia Science Academy charter school applications (see same applications referenced previously) and references a rubric that "guides observation and allows for the development of constructive feedback," this tool is not included in Attachment H; instead, Attachment H states that "The teacher evaluation tool has not yet been developed."

- No mention whether the referenced rubric (which is not included in Attachment H) aligns with BOE Policy 2055 or related provisions of any master collective bargaining agreements.

- The plan for handling unsatisfactory staff and faculty performance is vague and lacks the necessary level of detail to determine whether the plan would be effective.

  Description of plan from page 55:
  "Lower than expected performance will be reported to the person only with feedback and support and if necessary, a corrective action plan."

- No mention of planning for turnover.

- The application states that "We do not plan or anticipate any deviations;" however, components of the staffing plan are or may be in conflict with the HSTA contract – see notes to II.E.4.c, d and e above.

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| Section II.F: School Calendar and Schedule ||
|---|---|
| ☐ **Meets the Standard** | ☒ **Does Not Meet the Standard** |

**Rationale:**
The application does not meet the standard for any of the criteria in this section (two out of two criteria).

**Criterion II.F.1**
A school calendar for the proposed school's first year of operation, including total number of days school is in session, hours of instruction, 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 provided as **Attachment I**, and a satisfactory explanation of how the calendar aligns with and clearly reflects the needs of the Academic Plan.

| ☐ **Meets the Standard** | ☒ **Does Not Meet the Standard** |
|---|---|

**Rationale:**
- The school calendar is missing the following:
  - total number of days school is in session (totals included for each quarter, but not for the full year)
  - hours of instruction
  - the beginning and ending of each segment provided as Attachment I
  - a satisfactory explanation of how the calendar aligns with and clearly reflects the needs of the Academic Plan (no explanation of how the calendar aligns with and reflects the needs of the Academic Plan)

**Criterion II.F.2**
A clear description of the structure of the proposed school's day and week that aligns with and clearly reflects the needs of the Academic Plan, including the following:
**a.** A description of the length and schedule of the school week.
**b.** A description of the length and schedule of the school day including start and dismissal times.
**c.** The minimum number of hours or minutes per day and week that the proposed school will devote to academic instruction in each grade.
**d.** The number of instructional hours or minutes in a day for core subjects.
**e.** A satisfactory explanation of why the proposed school's daily and weekly schedule will be optimal for student learning.
**f.** Clear information about how teachers' work will be organized on a weekly or annual basis, including teacher planning time and professional development. The number of hours or minutes in a day for teacher planning time.

**g.** Clear information about the length of the school day and year, including summer school and time allocated for teacher professional development.
**h.** A school calendar and student schedule which provides at least as much core instructional time during a school year as required of other public schools.
**i.** Explain any aspects of the school year that are not evident on the calendar or would benefit from further elaboration.
**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 for each grade. Present a typical week of instruction, including: length of the teacher's work day, supervisory time, planning periods, professional development, and any other duties the teacher performs in a given day.
**l.** 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 vision and plan for professional culture.

| ☐ **Meets the Standard** | ☒ **Does Not Meet the Standard** |
|---|---|

**Rationale:**
- The description of the structure of the proposed school's day and week is missing the following:
  - A description of the length and schedule of the school week.
  - The minimum number of hours or minutes per day and week that the proposed school will devote to academic instruction in each grade.
  - The number of instructional hours or minutes in a day for core subjects.
  - A satisfactory explanation of why the proposed school's daily and weekly schedule will be optimal for student learning (the explanation provided is unsatisfactory: "We allocate time and resources to our core courses and other crucial parts of our educational program everyday.")
  - Clear information about how teachers' work will be organized on a weekly or annual basis, including teacher planning time and professional development. The number of hours or minutes in a day for teacher planning time.
  - Clear information about the length of the school day and year, including summer school and time allocated for teacher professional development; furthermore, the application indicates that the information provided regarding the school calendar is tentative and may change if "…school administration and board decide otherwise" (page 57).
  - Whether the school calendar and student schedule which provides at least as much core instructional time during a school year as required of other public schools -- cannot confirm, as the school calendar is tentative and may change if "…school administration and board decide otherwise" (page 57).

- Attachment J includes a sample weekly schedule for 6th grade (secondary), but nothing for any elementary grade level.

- Attachment K includes a sample weekly schedule for 6th grade (secondary), but nothing for any elementary grade level. Also, it is not consistent with information provided in table in II.F.2.b – no staff meeting time reflected in the sample weekly teacher schedule.

- Attachment I does not include all requested information; see notes to II.F.1 above.

- Attachment D provides information about the instructional content, but nothing that aligns it or the schedule with the school's vision and plan for school culture.

- Attachment D states: "I am a 6th grader at Kulia Academy. I go to school at around 8:00 am in the morning. I usually work on an assignment, sometimes with the help of an older student until the classes start." Unclear who is supervising students during this time. This time is outside of teachers' scheduled work time and the applicant indicates in II.G.2 (page 59) that the school will not offer any extracurricular or co-curricular programs, which would include before school care.

- Attachment E provides information about the instructional content, but nothing that aligns it or the schedule with the school's vision and plan for school culture.

**Section II.G:  Supplemental Programs**
☒ **Not Applicable**

**Section II.H:  Conversion Charter School Additional Academic Information**
☒ **Not Applicable**

| **III. Organizational Plan** |
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| *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:**
The plan for the governance structure of the proposed school is not in compliance with the governing statute for charter schools in Hawaii.  The role of the governing board does not appear to support effective governance.

**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**:
Mission and Vision of the governing board is the same as the school's.

**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:**
The plan for the governance structure of the proposed school is not in compliance with the governing statute for charter schools in Hawaii and does not reflect a thorough understanding of key issues.

The response states Kūlia Academy "will be operated by a nonprofit organization."  The governing statute for charter schools does not provide for a non-profit organization to operate a start-up charter school, rather, that there should be clear separations between the governing board and any non-profit established to support the charter school.  The non-profit should be in a supporting role only and never operation or governance role of the charter school.  The governing statute for charter schools provides that the governing board is the independent governing body of its charter school, and has the independent authority to determine the organization and management of the school, the curriculum, and compliance with applicable federal and state laws.  The Commission cannot approve a charter application whose proposed governance structure is not implementable because it doesn't comply with the governing statute for charter schools.

Response does not provide a description with details of the board's responsibilities.  Response simply mentions operation and governance, and hiring and supervision of the School Principal, as responsibilities.

**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, including the primary roles of the proposed school governing board and how it will interact with the school director, any school management teams, any essential partners, and any advisory bodies. The description must include the size, current and desired composition, powers, and duties of the proposed school governing board that will foster the proposed school's success; identify key skills or areas of diverse expertise that are or will be effectively represented on the proposed school governing board; and adequately explain how this governance structure and composition will help ensure that: a) the proposed school will be an academic and operational success; b) the proposed school 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:**
The response has substantial gaps, lacks detail, and does not reflect a thorough understanding of charter school governance:

- Kūlia Academy describes the role of the School Principal as "fulfill the role of the corporation's general manager and will have general supervision, direction, and control over the corporation's business and officers, subject to the control of the Board." There appears to be a dual role for the School Principal that divides the Principal's focus between being a "general manager" for the school's board, and between operation of the charter school. The response does not adequately explain how this structure ensures academic or operational success of the proposed school.
- Kūlia Academy states that it is in the process of expanding the board and executive team, but it does not describe the desired composition of the board.
- Kūlia Academy states "The Board is responsible for hiring and supervising the School Principal…The Board approves major school and Kūlia policies, and budgets for Kūlia Academy." During the Clarification Interview board members had a similar response, reporting that the governing board will dictate school policy, but not micromanage the school, and will oversee school finances. Unfortunately, in both response opportunities there was clearly a focus of the governing board on policy and financial oversight but no mention of the governing body's responsibilities regarding academic success. Neither response adequately describes how the proposed governance structure fosters or ensures academic success. Rather, the clarification interview made it clear that the governing board will not micromanage the school and while the board did not provide to what extent it will take a hands-off approach, the responses do not provide confidence for an effective governance structure for the proposed school and there is a concern that the governing structure will not provide strong governance or oversight to facilitate success of the school.
- Kūlia Academy identifies skills and areas of expertise represented by the members of the proposed school governing board but does not adequately explain how this composition will help ensure academic and operational success; or how the governing board will effectively evaluate the success of the school director.

**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 |
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**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.**

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| ☒ **Not Applicable** |

**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:**
d.       Not all of the board's members have been identified, yet response did not provide a comprehensive and sound plan nor timeline for identifying and recruiting governing board members.  Rather, the response, "all board members have been identified for the charter proposal submission and charter opening process." ignores the criterion and does not show a thorough preparation and fails to present a clear, realistic picture of how the school expects to operate.  The response does not inspire confidence that members with necessary skills and qualifications will be recruited.
e..    The Applicant Governing Board will transition to a more permanent governing board, however, the succinct response, "Current board of Kūlia Academy is its permanent board. The board will seek to expand with the addition of parents" lacks detail and information to be a comprehensive and sound plan.  The response did not meet the standard of the criterion as the applicant did not answer the question. The response did not provide: the timeline for recruiting and adding new members; a description of the individual and/or collective skills sets the anticipated board members are expected to bring; a description of the priorities for recruitment; nor the kinds of orientation or training new members will receive.

**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:**
The response meets the criteria in some respects but requires additional information and the response has gaps:

New board members will be designated by the existing members but the response doesn't describe how this process is effective governance and although there were criteria when the current members were selected there is no explanation of that process or those procedures nor a description of how either is effective governance.

Although there are board meeting requirements, there are no explanations of how often the board will meet during start-up and the school year.

**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:**
The response states that members will recuse themselves but does not provide the specific steps that the board will take to avoid conflicts and mitigate perceptions of conflicts.

**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:**
Kūlia Academy does not have a plan for increasing the capacity of the governing board, orientation of new members, and ongoing training and development for members. As the application stated the the board will start a process in the school's first year of operations, it is unknown what governing board training will consist of, including the topics that will be addressed, and whether the training will be developed by the governing board itself or experienced trainers. The response fails to present a clear, realistic picture of how the school expects to develop a high-functioning board.

**Criterion III.A.11**
**If applicable, a clear and comprehensive description of the proposed school's associated nonprofit organization, including its current tax status and/or the plan and timeline for obtaining tax exempt status and the nonprofit's mission and purpose. The description must specifically identify ways that the proposed school's associated nonprofit organization will support the proposed school (such as community fundraising, developing partnerships, finding alternative funding sources, writing grants, and finding other ways to leverage existing resources) and specify any grants or programs that the nonprofit is planning to use. If the nonprofit's mission is not to solely support the proposed school, the description must also adequately explain any competing interests for the nonprofit's time and resources and how the proposed school will ensure such competing interests will not hinder the school's ability to operate and obtain outside supports.**

| ☒ Meets the Standard | ☐ Does Not Meet the Standard |
|---|---|

**Rationale:**
Response states Kūlia Academy is in the process of obtaining it 501(c)(3) designation.

**Criterion III.A.12**
**A list of all current and identified nonprofit board members that is in compliance with the State Ethics Code and their intended roles and a description demonstrating that the nonprofit board members have the necessary**

**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:**
There are concerns with the governance structure of Kūlia Academy and relatedly, the membership of nonprofit board presents potential conflicts of interest under the State Ethics Code. The proposal does not reflect a thorough understanding of key issues.

All the members of the nonprofit are the members on the governing board as a school employee, or the chair of the school's Governing Board, or as holding other leadership positions on both boards. This raises concerns for the number of voting members that are viable on the nonprofit and the governing board and thus the ability of either board to support the charter school immediately and upon the awarding of a charter. A review by the Hawaii Ethics Commission of the relationships between the GB and the nonprofit is required.

**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 §302D-19.**

| ☒ Meets the Standard | ☐ Does Not Meet the Standard |
|---|---|

**Rationale:**

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| **Section III.B: Academic, Financial, and Organizational Performance Management** | |
|---|---|
| ☐ Meets the Standard | ☒ Does Not Meet the Standard |

**Rationale:**
The Academic Performance Data Evaluation Plan is undeveloped; did not meet the standard because it failed to meet the criteria, and requires additional information. The plan for corrective appropriate actions did not cover all of the requested situations.

**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:**
    A.  Academic Performance Data Evaluation Plan
        ii. The proposal is undeveloped. While Kūlia Academy indicates academic data will be presented to the governing board, it does not include descriptions of training and other supports the governing board members will receive to be able to analyze, interpret, and use the academic performance data to improve student learning, nor the same for the school directors.  The response does not provide confidence that the school's board members will be adequately trained, or receive enough support, to be able to use the data to guide decisions to improve student learning.

**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 expectations 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:**
    A.  The response does not describe or provide any appropriate corrective actions if there are shortfalls in student academic achievement. The applicant simply states "necessary actions will be discussed". This section is especially critical as the applicant intends to target at-risk students who require interventions and modifications in order to achieve success.
    B.  The response only provides actions for audit findings; while not providing a clear description of appropriate corrective actions for shortfalls in the Financial Performance Framework.  There is no explanation of actions if a Notice Of Concern or Notice Of Deficiency is issued.  There is no explanation of actions if the proposed school encounters financial difficulties.  As the governing board will meet

quarterly after the school begins operations, it appears the board will receive financial reports about the school as often as the Commission. There is a concern for the board to be informed and address financial difficulties before there is a Commission finding, to be able to prevent the school from receiving a Notification of Concern or Notice of Deficiency.

C. The response states in case of a corrective action plan, the school administrator will inform the school board in a board meeting. However, the school's board only plans to meet quarterly.

| Section III.C: Ongoing Operations | |
|---|---|
| ☐ Meets the Standard | ☒ Does Not Meet the Standard |

**Rationale:**
Kūlia Academy did not answer III.C.2., nor III.C.3 completely.

**Criterion III.C.1**
**If the proposed school will provide daily transportation, a sound plan describing the transportation arrangements for prospective students, including a description of how the proposed school plans to meet transportation needs for field trips and athletic events. If the proposed school will not provide daily transportation, what were the factors that led to this decision and what was the impact of not providing transportation?**

| ☒ Meets the Standard | ☐ Does Not Meet the Standard |
|---|---|
| **Rationale:** | |

**Criterion III.C.2**
**Sound plans for safety and security for students, the facility, and property, including descriptions of policies and the types of security personnel, technology, and equipment that the proposed school will employ. If the proposed school has a *virtual* or *blended learning program*, the description must include physical or virtual security features to deter theft.**

| ☒ Meets the Standard | ☐ Does Not Meet the Standard |
|---|---|

**Rationale:**
Although, Kūlia Academy did not provide a plan for safety and security, stating instead that a safety plan will be prepared for the school prior to school opening. The response did provide a list however of areas that will be covered in its plans.

**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 facility with a certified kitchen, transporting food from a certified kitchen, or other means of providing food service that is in compliance with applicable laws. If the proposed school will not provide food service, what were the factors that led to this decision and what will be the impact of not providing food service?**

| ☐ Meets the Standard | ☒ Does Not Meet the Standard |
|---|---|

**Rationale:**
Kūlia Academy did not answer the question. The applicant did not provide the factors that led to their decision not to provide food service and did not explain any impacts of not providing food service. This question is especially critical as the applicant expects a higher than 50% FRL (pg. 3) student population. Easily accessible are numerous reports discussing links between hunger, or insufficient food intake, and performance.

| Section III.D: Student Recruitment, Admission and Enrollment | |
|---|---|
| ☐ Meets the Standard | ☒ Does Not Meet the Standard |

**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:**
The response lists several activities to inform the community but does not describe how the activities will make Kūlia Academy attractive to both higher income families as well as families in poverty. This section is important as the school expects a high percentage of FRL but its mission statement intends the program to prepare a diverse student population. The lack of detail or explanation makes it uncertain how the school intends to achieve socioeconomic and/or demographic diversity. It appears that the applicant intends to target educationally disadvantaged students (pg. 14) and high-need students (pg. 18) and particularly recruit and meet the needs of socioeconomically disadvantaged and minority students (mission statement) but there is less explanation on how Kūlia Academy will target intellectually gifted children, or higher income families, or students from families with higher levels of education.

**Criterion III.D.2**

**If applicable, the identification and description of any enrollment preferences that the proposed school would request that are in compliance with federal and state law and any Commission policies or guidelines, including a reasonable justification for the enrollment preference request.**

| ☐ Meets the Standard | ☒ Does Not Meet the Standard |
|---|---|

**Rationale:**
Although the response meets the standard technically the response does not appear to align with the plan for the school. The mission statement says Kūlia Academy will "particularly try to recruit and meet the needs of socioeconomically disadvantaged and minority students" however Kūlia Academy is not proposing enrollment preferences for socioeconomically disadvantaged and minority students. There is no explanation of how the admission policy aligns with the mission statement and the academic plan. As the admissions policy states "Kūlia Academy will specifically target high-need students including students with disabilities, English Learners and other educationally disadvantaged students" it is not clearly understood how the school will be successful if it doesn't enroll the targeted student population or how the school intends to ensure the targeted population enrolls at Kūlia Academy.

**Criterion III.D.3**

**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 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; |
| e. | A description of how the school will ensure that it will meet its enrollment targets; and |
| f. | A contingency plan if enrollment targets are not met. |

| ☐ Meets the Standard | ☒ Does Not Meet the Standard |
| --- | --- |

**Rationale:**
The admission and enrollment policy did not include all the requested information and does not meet the standard of the criterion.  Missing is:
A.         A reasonable timeline for the application period, and how the school will receive and process applications.
E.         As the admissions policy states "Kūlia Academy will specifically target high-need students including students with disabilities, English Learners and other educationally disadvantaged students" however there are no preferences for the targeted population.  The response doesn't describe how the school will ensure it meets the anticipated enrollment targets and whether the academic plan can be implemented for success if there are not high percentages of the targeted student population at the school.
F.         This question was answered through budgetary responses, however a contingency plan if enrollment targets are not met may be especially important as there are no admission preferences to help ensure enrollment of the student population who benefit most from the proposed academic plan and to ensure the school meets its own mission statement.

| Section III.E:  Geographic Location and Facilities | |
| --- | --- |
| ☐ Meets the Standard | ☒ Does Not Meet the Standard |

**Rationale:**
The descriptions of the facilities the Applicant considered lacked sufficient detail.  The applicant does not provide a reasonable and sound facility growth plan.

**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:**
Throughout the application there was confusion regarding locations as areas were not referred to by the actual names.  This was brought up during the Clarification Interview and appears the applicant may not have much knowledge with the island or may not have properly researched the intended area.

**Criterion III.E.2**
**Facilities**
a. **If the proposed school has obtained a facility,** 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:**
A. Kūlia Academy stated of 3 potential facilities, 2 would be options if the move-in date were closer. The response did not describe the facilities including addresses, footage, amenities, previous use, nor an assessment of what needs to be done for building compliance. The summary of 5 steps is insufficiently detailed to be a comprehensive, reasonable, and sound plan to secure and renovate a facility. Although the applicant did not identify a real estate agent, it did state it would work with one. This suggests future work rather than work that has already been done. The lack of details and explanation suggests the applicant didn't conduct a thorough preparation regarding facilities. If the applicant did not conduct sufficient research into whether the targeted location has facility possibilities that meets the program's needs, the application isn't approvable until a proper facility search is conducted.
B. The response merely lists 2 needs to accommodate growth, and does not provide a reasonable and sound facility growth plan. It does not mention any permits, or rezoning that might be necessary to implement growth plans. The lack of details suggests the applicant didn't conduct a thorough preparation for the facilities plan.

| **Section III.F: Start-Up Period** | |
|---|---|
| ☐ Meets the Standard | ☒ Does Not Meet the Standard |

**Rationale:**
The plan for the start-up period is not comprehensive, as it failed to include all requested information. The plan for leading the development of the school is not a sound plan for leading the development of the school during its pre-opening phase as the plan identifies only a single purpose for the activities in the Implementation Plan.

**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 meets the criteria in some respects but requires additional information in one or more areas.

In response to letters a. through f. the applicant refers to Attachment Q, however, attachment Q did not provide all the information to meet the standard of the criteria.

    A.   Although there is a contribution/donation included in the Year 0 Budget sheet, Attachment Q doesn't mention these funds in relation to the start-up period; there is no identification or description of the funds of the Year 0 budget, in Attachment Q. It is assumed the proposed school has no plans for fundraising or grant writing but this must be assumed since the applicant ignored this criterion.

    B.   Attachment Q states Kūlia Academy uses social media advertising to target future students and parents, and the school's Mission provides that efforts should be targeted to recruit socioeconomically disadvantaged and minority students. In the Clarification Interview the applicant reported that partnerships are not an not an essential part of their plans to achieve the projected enrollment. Since the proposed school will not partner with DOE, private, or other charter schools, there appears to be a large reliance on its social media marketing, and hosted events, to identify possible students and achieve the projected enrollment.

    C.   The proposed school does not intend to add new members to the governing board until school starts, but the dates for recruiting parents is not

    E.   The applicant does not intend to add new members until school starts but the dates for recruiting parents is missing. In addition, although it was made clear in the Capacity Interview that more members will need to be added to supplement the existing board, does not have a plan for increasing the capacity of the governing board, orientation of new members, and ongoing training and development for members. As the application stated the the board will start a process in the school's first year of operations, the response fails to present a clear, realistic picture of how the school expects to operate. The school's plan to delay the development of a recruitment plan to the school's first year of operations, the same time it has indicated it will need new members, is a poor recruitment plan and does not inspire confidence in the applicant's capacity to recruit members with qualifications to serve on the governing board.

    F.   While the the Implementation Plan as a chart lists activities and targeted timelines for completion meets the criterion technically, there is a concern that only a single individual is tasked with all activities.

**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:**
Applicant did not provide a sound plan for the pre-opening phase. The Principal will work as a volunteer until April 2020 when he is hired/paid and is the sole individual responsible for all tasks and activities listed in the start-up plan.  The activities of the board is unclear during the start-up period, such as whether the it will act as more than just a guide for fiscal management, compliance and reporting (Attachment Q).  The appearance that it will act as a delegation body is reinforced by the plan to meet only six times during the start-up phase.  The hands-off approach of the board and that no apparent participation in the start-up period activities to take advantage of the expertise listed of the members, does not inspire confidence in the applicant's capacity to carry out the plan effectively.

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**Section III.G:  Conversion Charter School Additional Organizational Information**

☒ **Not Applicable**

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**Section III.H:  Third Party Service Providers**

☒ **Not Applicable**

| 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 Oversight and Management | |
|---|---|
| ☒ Meets the Standard | ☐ Does Not Meet the Standard |

**Rationale:**
Applicant meet the standard for three out of three criteria 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, purchasing, and payroll, including an adequate explanation of how the proposed school will establish and maintain strong internal controls and ensure compliance with all financial reporting requirements.  The description must also explain the plans and procedures for conducting an annual audit of the financial and administrative operations of the proposed school that is in accordance with state law, including a reasonable annual cost estimate of the audit that is included in the Financial Plan Workbook.**

| ☒ Meets the Standard | ☐ Does Not Meet the Standard |
|---|---|

**Rationale:**
The applicant has provided reasonable assurance that the proposed school will have systems, policies and processes or financial planning, accounting, purchasing, and payroll.  The applicant has proposed a timeline prior to the start of operations in which to develop financial management policies that include annual budget making, accounting, and reporting processes.  However

**Criterion IV.A.2**
**A clear description of the roles and responsibilities that demonstrates a strong understanding of the appropriate delineation of such roles and responsibilities among the proposed school leadership team or management team and proposed school governing board regarding school financial oversight and management.**

| ☒ Meets the Standard | ☐ Does Not Meet the Standard |
|---|---|

**Rationale:**
The applicant has provided a description of the roles and responsibilities of the school director, the school business manager, and the school governing board.

**Criterion IV.A.3**
**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 has provided a description of the criteria pertaining to selecting vendors and contractors but has provided little to no information on the procedures for selecting vendors or contractors.  The applicant does not clarify who will make decisions on selecting contractors or vendors and if the decision-makers change depending on the amount of monies spent.  These omitted items are the primary processes covered under a procurement policy; should the applicant be approved. the applicant should be required to submit a procurement plan as one of the pre-opening assurances.

| Section IV.B: Operating Budget | |
|---|---|
| ☐ Meets the Standard | ☒ Does Not Meet the Standard |

**Rationale:**
Applicant did not meet the standard for two out of two criteria below.

| Criterion IV.B.1 | |
|---|---|
| **Complete, realistic, and viable start-up and three-year operating budgets, provided through the Financial Plan Workbook (Exhibit 5 and 5a) as Attachment S , that align to the Academic and Organizational Plans.** | |
| ☐ **Meets the Standard** | ☒ **Does Not Meet the Standard** |

**Rationale:**

The applicant has not provided a complete, realistic, and viable start-up and three year operating budget. The budget submitted does not correlate to the staffing plan (Attachment F). In the budget, the applicant does not report the salaries for the assistant school director(s) for any of the budget years. According to the staffing plan, the school will have three assistant school directors by Year 2- the Dean of Academics, the Dean of Culture, and the Dean of Students- with an annual salary of $62,000 (total of $186,000). These costs for the assistant school directors cannot be found in the budget. To further complicate matters, the costs reported on the staffing plan ($1,482,000) differs from the actual total of listed salaries in the staffing plan by $60,000 (actual cost is $1,542,000).

In addition, the staffing plan itself contains errors in the number of FTEs accounted for. For example, in Year 1, the total FTEs on the staffing plan says 16.5; however, the actual number of employees listed in the plan is 18. For Year 2, the total FTEs on the plan says 27, however, the actual number of employees listed is 29.

Year 2 presents a clear example of the lack of cohesion and correlation of the budget with other aspects of the application. As previously stated, the total FTEs on the staffing plan says 27, however, the actual number of employees listed for each position is 29. The annual budget for Year 2 provides an FTE count of 28.5; as such, the evaluation team was unable to correlate the salary costs listed in the budget with the staffing plan, even with the $60,000 discrepancy factored in.

Since personnel costs account for at least sixty percent of the total budget for each budgeted year, the lack of cohesion and accuracy of the personnel costs raise concerns pertaining to the reliability and viability of the budget as a whole. At capacity (year 6 of operation), the proposed school projects to have 68-69 employees; the discrepancy in personnel costs just in the staffing plan total $118,000.

These discrepancies invalidate the applicant's budget and raise questions regarding the school's financial health and viability, as well as the applicant's current procedures regarding fiscal reporting and management. During the clarification interview, the governing board president stated that the application was reviewed and edited multiple times by the board before being submitted. However, these errors were not found and the application was submitted. This raises concerns regarding the board's fiscal experience and management.

In addition to these errors, other concerns in the budget include budgeted staffing costs for teachers budgeted at $51,000 -53,000 for each teacher, in years one through three of the budget. 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: Class II teachers, Step 7 or lower; Class III teacher, Step 5 or lower; or Class IV, Step 3 or lower. Teachers with licenses start at Step 5, all lower Step teachers would be unlicensed, have not completed a State Approved Teacher Education Program, and would only be eligible for an emergency hire permit. This results in the proposed school only being able to afford a licensed teacher at the lower end of experience and qualification scale, 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. These budgeted costs also raise doubts as to whether the school would be able to attract experienced teachers capable of implementing the rigorous college preparatory model envisioned and teaching the desired number of AP classes.

| Criterion IV.B.2 |
|---|
| **Budget Narrative** |
| **A detailed budget narrative that clearly explains reasonable, well-supported cost assumptions and funding estimates, including but not limited to the basis for funding projections, staffing levels, and costs. The 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 |
|---|---|

**Rationale:**
The applicant has not provided a sound contingency plan if funding is lower than anticipated or if enrollment goals are not met. The contingency plan is sparse with little to no detail on how the school will adapt if funding is lower than expected. The contingency plan relies on budget surpluses, according to the applicant, if the school enrolls 10 students less than projected, the school would be function with no negative year end balance. However, a 10 student difference out of a total projected student enrollment of 220 students in Year 1 amounts to approximately a 5 percent variance. It is unclear, due to the unreliability of the budget, whether this variance is accurate. In addition, the school does not account for a larger variance or lower than anticipated funding.

| **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:** | |
| The applicant did not meet the standard for four out of five criteria sections below. Criteria V. A. 3 does not apply. | |

**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 *high-quality charter school*) 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**

   b. **Describes the academic team's individual and collective qualifications for implementing the proposed 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** | ☒ **Does Not Meet the Standard** |
|---|---|

**Rationale:**

There is undemonstrated experience in the applicant's academic team.  While the professors on the governing board have valuable skills, they were not tasked with implementing much of the academic plan, and do not have the necessary experience to implement an academic plan for a startup school.  Much of the implementation of the academic plan will rest with the Dean of Academics position and the School Director.

The position of Dean of Academics is identified as overseeing one of the three key components of the school's educational model ("Academic Scholarship with college-prep curricula and instruction with proactive guidance, support, and continuous monitoring and assessment that prepare all students for academic success in college and careers" -- II, page 13) and is described throughout the application as playing an important role in essential school activities, including:

o  hiring, evaluating, and managing teachers (II.E.4.c-e, pages 50-55);

o  leading and reporting on all professional development (II.E.2.c, pages 49-50; II.E.2.d, page 50; III.B.1.c, page 70);

o  selecting instructional materials that will meet the needs of the target student population (II.B.3, pages 19-20);

o  creating the elementary class schedule (II.F.2.d, page 57); and

o  monitoring and reporting on student academic achievement, as well as developing and implementing corrective actions if student academic achievement falls short of the school's goals (III.B.2.a, page 71).

In the clarification interview, the Applicant Team shared that a single person would serve as both the Dean of Academics and the Dean of Culture in Year 1, which, according to the position descriptions in Attachment Y, would make one person responsible for overseeing and monitoring student academic performance; curriculum and instruction; student management, supervision, discipline, and support; personnel management and evaluation; professional development; school culture; character education; and parent and community involvement.  This seems like an unreasonable list of duties for a 1.0 FTE position.

The position description for the Dean of Academics does not include required skills and qualifications, unlike all other position descriptions in Attachment Y - School Leadership and Management Team's Job Descriptions or Qualifications.  When asked about this in the clarification interview, the Applicant Team confirmed that the skills and qualifications for this position have yet to be identified and that they should have been included.

Although the application indicates that the governing board has already selected an individual to fill the position of Dean of Academics (V.A.1.a, page 88), in the clarification interview, the Applicant Team clarified that they have identified a likely candidate, but still plan to conduct a competitive hiring process for this and all of the school administration positions, including school director/principal.  Because the individuals identified in the application as having already been selected for the positions of Project Director/Principal and Dean of Academics are actually tentative selections, it is not possible to assess whether the school's academic team has the necessary qualifications and capacity to successfully implement the Academic Plan.

**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 does not describe any ties to or knowledge of the community in the geographic area where the school facility will be or the area where the anticipated student population will come from.  During the clarification interview, the Applicant Team had considerable difficulty identifying the target geographic area, which is referred to as "Honolulu County" in the application.  The Applicant Team could not differentiate between the city of Honolulu, the City and County of Honolulu, and "Honolulu County," the latter of which does not exist. During the capacity interview, the applicant could not be specific about the location of the school and instead, stated that it would be "near the rail line."  Additionally, the applicant (who will offer grades K-12 at capacity) is pursuing a school location in an area that already has an innovative school in Waipahu High School which has a program that allows students to take college courses while in high school.  This is similar to the applicant's model which encourages its students to attend college after high school.

When describing schools in the target geographic area that the proposed school would serve, the applicant listed six schools that were located in the mainland United States, instead of listing schools in the area between Pearl City to Waipahu, which is where the school would like to be located.

When asked during the clarification interview to explain the rationale for planning to produce "brochures and fliers that will clearly present the mission and vision of our school…[and] will also be used in targeted mailings to households in underserved communities" in English, Spanish and Native Hawaiian, no explanation could be provided for the selection of Spanish and Native Hawaiian.

**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.**

| ☒ **Not Applicable** No planning partners stated in the application. |
|---|

**Criterion V.A.4**
**School Director.**
**Submit a position description for the school director.  The applicant is required to provide the position description as Attachment W (required attachment, no page limit).  The position description shall include:**

   a.   **The job description, responsibilities, characteristics, and qualifications for the school director.  The position description shall include rigorous criteria that is designed to recruit a school director with**

| the experience and ability to design, launch, and lead a *high-quality charter school* that will effectively serve the anticipated student population and implement the Academic Plan; and |
|---|

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 V to indicate that the school director is known or unknown at the time of the application.**

c. If known, identify the school director, and provide as Attachment V (required attachment, no page limit) the school director's resume including their academic and organizational leadership record.

| ☐ **Meets the Standard** | ☒ **Does Not Meet the Standard** |
|---|---|

**Rationale:**
The proposed school director exhibits undemonstrated experience, and it is not clear if he has the adequate experiences to become the director of a K-12 school. The proposed school director has no experience hiring teachers.

**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. If known, 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** |
|---|---|

**Rationale:**
According to the application, the school management team is comprised of the school principal and the dean of academics positions. When starting a new school, having only two people to carry out a wide range of duties in running the school will be difficult.

| **Section V.B: Organizational Plan Capacity** | |
|---|---|
| ☐ **Meets the Standard** | ☒ **Does Not Meet the Standard** |

**Rationale:**
Applicant did not meet the standard for two out of three criteria sections below. Criteria V. B. 2 does not apply.

**Criterion V.B.1**

Evidence that the key members of the proposed school'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 applicant lists the proposed school leader and a governing board member as being responsible for implementing the organizational plan.  Both have undemonstrated capacity to implement the organizational plan. There is concern regarding capacity related to facility acquisition and development since during the Capacity interview, the school leader could not articulate a plan for facilities.

**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.

☒ **Not Applicable** No planning partners stated in the application.

| **Section V.C:  Financial Management Capacity** | |
|---|---|
| ☐ Meets the Standard | ☒ Does Not Meet the Standard |

**Rationale:**
Applicant did not meet the standard for one out of two criteria below. Criteria V. C. 2 does not apply.

**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 *high-quality charter school*) 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 successfully, including sufficient capacity in areas such as financial management, fundraising and development, accounting, and internal controls.

| ☐ Meets the Standard | ☒ Does Not Meet the Standard |
|---|---|

**Rationale:**
Members of the proposed school financial team have an undemonstrated ability to implement the financial plan successfully and do not have experience starting a charter school.  The applicant did not demonstrate financial management capacity as the Financial Plan, specifically the annual budgets, contained errors and exclusions despite a review by the applicant's governing board.  The staffing plan and accompanying budget for staffing contained errors in the amount of total full time employees, resulting in conflicting numbers reported in various documents of the application.  The applicant board president said in the clarification interview that the board reviewed and edited the application multiple times.  However, the review did not correct the errors and conflicting information.

**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 Criterion V.A.3), from such essential partners demonstrating these partners are committed to planning, establishing, and/or implementing the Financial Plan.**

☒ **Not Applicable** No planning partners stated in the application.