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STATE OF HAWAII

**STATE PUBLIC CHARTER SCHOOL COMMISSION
(‘AHA KULA HO‘ĀMANA)**

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RECOMMENDATION SUBMITTAL

DATE OF SUBMITTAL: July 11, 2017

DATE OF MEETING: July 13, 2017

TO: Catherine Payne, Chairperson

FROM: Sione Thompson, Executive Director

AGENDA ITEM: VI. Action on Charter Application for Proposed Charter School, IMAG Academy

I. DESCRIPTION

Action on Charter School Application for Proposed Charter School, IMAG Academy.

II. AUTHORITY

Charter School Applications: Pursuant to §302D-5(a), Hawaii Revised Statutes, “[a]uthorizers are responsible for executing the following essential powers and duties: . . . (1) Soliciting and evaluating charter applications; (2) Approving quality charter applications that meet identified educational needs and promote a diversity of educational choices; [and] (3) Declining to approve weak or inadequate charter applications[.]”

III. APPLICANT PROFILE (AS DESCRIBED BY THE APPLICANT)

Proposed School Name: IMAG Academy

Mission: “IMAG Academy’s mission is to uncover a student’s strengths and potential through engaging in community-centered concerns and projects in a safe, family-like environment that is accepting, supportive, and nurturing.”

Vision: “Our vision is to become a community resource raising generations of innovative, mindful, accepting, and giving (IMAG) citizens grounded in their knowledge and capabilities to create and sustain ethnically diverse, successful, and peace-filled communities.”

Geographical Area: “IMAG Academy will be located within the boundaries of the city of Waipahu. It is surrounded by the cities of Kapolei, Ewa, Ewa Beach, Pearl City, and Mililani, known as the central leeward area. The area has over 44,000 of the 180,000+ students within the public school system spread across some of the largest campuses within all school levels.

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

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

Key Components of the Educational Model:

- “1. Safe & Nurturing Environment - Social-Emotional and Communication Development
- 2. Real World Relevance - Engaged and Deeper Learning
- 3. Academic Rigor - Content, Performance and Skills Mastery

These key components provide IMAG Academy with an educational program that celebrates achieving high academic and social expectations. Non-negotiable, this 3-prong approach ensures a 360 degree support system where all members of our community can excel and thrive. As important, this combination ensures students will be able to provide their and our community’s voice as they engage, succeed and thrive in solving real world concerns and opportunities. The ultimate success, as prescribed by our student outcomes, is when innovation, mindfulness, acceptance, and giving are inherent within our student’s decision making process and solutions.”

Enrollment Summary

Grade Level	Number of Students											
	Year 1 2018		Year 2 2019		Year 3 2020		Year 4 2021		Year 5 2022		Capacity 2023	
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	25		50		50		50		50		50	
1	25		25		50		50		50		50	
2			25		25		50		50		50	
3					25		25		50		50	
4							25		25		50	
5									25		50	
6	25		25		25		25		25		50	
7	50		50		50		50		50		50	
8	50		50		50		50		50		50	
9	50		75		50		50		75		75	
10			50		75		75		75		75	
11					50		75		75		75	
12							50		75		75	
Subtotals	225		350		450		575		675		750	
Totals	225		350		450		575		675		750	

IV. BACKGROUND

Each application was reviewed by an evaluation team assembled by Commission staff. The Evaluation Team assigned to the IMAG Academy application was comprised of Danny Vasconcellos (Team Lead), Beth Bulgeron, Amy Cheung, Derek Scott Hall, Cindy Henry, and Sylvia Silva.

The Evaluation Team's role in the applications process is to evaluate the application against the evaluation criteria in order to develop recommendations for approval or denial to the Commission. In developing its recommendation, the Evaluation Team reviewed the application; conducted a capacity interview with applicant group members; and reviewed the applicant's response to the Request for Clarification. The Evaluation Team does not consider public hearing testimony, any comments that have been submitted by the DOE, or the applicant's response to the Evaluation Team Recommendation Report in developing its recommendation.

Key components of the evaluation process are as follows:

- **Interview:** As required by Section 302D-13, HRS, the evaluation team conducted interviews with IMAG Academy on April 6, 2017. The RFP required the proposed school director, proposed key school personnel, and members of the governing board to attend the interview and conduct a ten minute presentation on the main elements of their proposed charter school. The applicant group members that attended the interview were: Randy Shiraishi (governing board member), Deborah Bond-Upson (governing board member), Michael Nakata (governing board member), Sheila Buyukacar (proposed school director), and David Gibson (Hookakoo Corporation).
- **Request for Clarification:** Following the interview, the Evaluation Team may issue a Request for Clarification in order for the applicant to clarify certain elements of the proposal in

writing. The Evaluation Team issued a request for Clarification to IMAG Academy on April 17, 2017. IMAG Academy submitted a completed Request for Clarification on May 1, 2017.

- **Public Hearing:** Section 302D-13, HRS requires the Commission to hold a public hearing to allow the public an opportunity to provide its input on each charter application. As such, the Commission held a public hearing on the applications submitted as part of the 2016-2017 applications cycle on May 11, 2017. The RFP required the proposed school director, proposed key school personnel, and members of the governing board to attend the public hearing and conduct a ten minute presentation on the main elements of their proposed charter school. Three applicant group members, and one community member provided oral testimony in support of IMAG Academy. Written testimony was submitted for this applicant from 11 individuals. A list of 396 supporters, and a memorandum of understanding with Hookakoo Corporation was also submitted.
- **Evaluation Team Recommendation Report:** This report is produced by the Evaluation Team culminating the review of the application, capacity interview, and request for clarification. Additionally, the applicant has the option to respond in writing to the Evaluation Team Recommendation Report. If the applicant opts to write a written response to the Evaluation Team Recommendation Report, the Evaluation Team may also write a rebuttal to the applicant's response. The Evaluation Team Recommendation Report was sent to IMAG Academy on May 22, 2017. IMAG Academy submitted a written response to the Evaluation Team Recommendation Report on June 1, 2017. The Evaluation Team opted not to write a rebuttal to the IMAG Academy response to the Evaluation Team Recommendation Report.
- **DOE Comments Solicited:** Commission staff solicited comments from the Department of Education ("DOE")—particularly the Pearl City – Waipahu Complex Area Superintendent, Rodney Luke—on the IMAG Academy application. The DOE Office of Strategy, Innovation and Performance emailed Commission staff that the Complex Area Superintendent has no comment regarding IMAG Academy.
- **Executive Director (Staff) Recommendation:** This recommendation is completed by the Executive Director, and appears in the section below.

The Evaluation Team Recommendation Report (**Exhibit A**), and IMAG Academy Response to the Evaluation Team Recommendation Report (**Exhibit B**), are attached to this submittal.

New Information Cannot Be Considered

Section 302D-5, HRS prohibits the Commission from providing technical assistance to charter applicants where the technical support would directly and substantially impact an authorizer decision related to the approval or denial of the charter application. Because of this, the applications process does not allow applicants to refine and finalize their applications once the application is submitted since applicants must be able to acquire the necessary expertise and develop a high quality application on their own.

At the beginning of the applications process, applicants were advised that the information submitted in the application should be a complete and accurate depiction of the applicant group's proposed plan. Applicants had the opportunity to provide clarifying information through the Request for Clarification responses. However, applicants may not provide any new information beyond the clarifying information provided to the Evaluation Team thorough the Request for Clarification because such new information would not have been completely evaluated by the Evaluation Team. For the purposes of the applications process, new information means any information that substantially differs from what is provided in the application and is revisionary in

nature. Removal or addition of significant elements of curriculum that substantially change the academic plan, submittal of a substantially revised policy, or changing the geographic location or grades served are examples of new information.

Further, the Request for Proposals states that the Commission shall not consider new information that was not available to the Evaluation Team. As such, when conducting their review of the application, and during decision-making, Commissioners should not consider any new information submitted by the applicant. A simple way to avoid the consideration of new information is to focus on the criteria stated in the RFP, in the application template, the evaluation report and specifically Exhibit A of the evaluation report. Clarifying questions Commissioners may have should focus on the specific criterion or criteria in question.

V. INFORMATION FOR CONSIDERATION

Evaluation Team Recommendation Report

In creating its Recommendation Report for IMAG Academy, the Evaluation Team assessed the following:

- IMAG Academy's application was assessed against the evaluation criteria presented in the RFP;
- Capacity interview; and
- Request for Clarification.

Following the review of the application, capacity interview and Request for Clarification, the Evaluation Team came to a consensus on its recommendation to deny the charter application for IMAG Academy. In order to receive a recommendation for approval, an application must meet the standard of approval in all four core areas of the application. The recommendation to deny the IMAG Academy application was due to the applicant not meeting the standard of approval in three of the four core areas of the application. IMAG Academy satisfied the criteria for the academic plan, however, it did not meet the standard of approval with its organizational plan, financial plan, and applicant capacity.

The Evaluation Team found that the academic plan met the standard since the plan presented was grounded in best practices and provided a comprehensive framework that included rigorous, high quality instructional design. However, the organizational plan did not meet the standard since Evaluation Team found that the applicant's plan lacked important details, and included conflicting plans for school operations and contained inconsistencies in the organizational structure related to its plan to contract with Hookakoo for management services. The financial plan did not meet the standard since the Evaluation Team found that the plan provided raised concerns about the school's viability, and the financial team's capacity. IMAG Academy managed to secure a cost reimbursement federal grant to fund its start-up activities, however, the school does not have sufficient funds to cover its expenses prior to receiving any federal reimbursement. The Evaluation Team did not meet the standard of approval for applicant capacity since IMAG Academy has not demonstrated through its application that it has the organizational and financial capacity to open and operate a high quality charter school. The Evaluation Team noted that it had concerns with the proposed school director who does not have a demonstrated record of accomplishment related to student outcomes, and does not have the experience to manage a project of this scope. The Evaluation Team also noted that it was concerned with the applicant's ability to simultaneously launch a school with elementary, middle, and high school divisions.

Applicant Response

IMAG Academy submitted a response to the Evaluation Team Recommendation Report. The response to the Evaluation Team Recommendation Report states that the Evaluation Team misunderstood the IMAG Academy application and attempts to point out the areas in the application that would address the concerns of the Evaluation Team.

Evaluation Team Rebuttal to Applicant Response

The Evaluation Team opted not to submit a rebuttal to the applicant response to the Recommendation Report.

DOE Comments on IMAG Academy

The DOE Office of Strategy, Innovation and Performance emailed Commission staff that the Pearl City – Waipahu Complex Area Superintendent did not have comments on IMAG Academy.

Executive Director (Staff) Recommendation

In developing the executive director (staff) recommendation, the RFP states that the following will be considered:

- Evaluation Team Recommendation Report, Applicant Response, Evaluation Team rebuttal
- Public hearing testimony
- DOE comments

While the Evaluation Team Recommendation Report covers a variety of issues, the executive director has attempted to focus on the few issues that appear to be the most significant and would have the biggest impact on an applicant's ability to successfully start and operate a high-quality charter school. The omission of an issue from this review is not meant to indicate that the executive director believes that the issue was resolved one way or another, only that it is not a major point of contention or is not a critical point that warrants further analysis here. For each key point the executive director reaches a conclusion for the Committee's consideration, but at a minimum the inclusion of these points in this submittal are intended to draw out the key points for an approval or denial of the application.

The applicant satisfied the criteria for the academic plan but did not meet the standard for approval with its organizational plan, financial plan, and applicant capacity. The organizational plan does not meet the standard as the plan lacks important details, does not provide enough specific information in one or more areas, and fails to align with the academic and financial plans. The financial plan does not meet the standard since the plan raises concerns about the school's viability and the financial team's capacity. The school has secured a cost reimbursement federal grant to fund its start-up activities; however, the school does not have sufficient funds to cover the actual expenses prior to any federal reimbursements for the start-up year. The applicant's capacity does not meet the standard because it has not demonstrated that it has the organizational and financial capacity to open a high quality charter school. Additionally, although the academic plan as written meets the standard of approval, the proposed school director lacks a demonstrated record of accomplishment related to improving student outcomes, and does not have experience managing a project of this scope.

It is the Recommendation of the Executive Director to support the review team's ratings in each of the four core areas of the application and therefore support the overall recommendation of a non-approval of this applicant.

The duty of the Evaluation Team is to recommend approval or denial of each application based on its merits. The Commission's Executive Director, with assistance from the Operations Section, is charged with reviewing the Evaluation Team recommendation report, the testimony at public hearings, comments from the Department of Education, and other information obtained during the application process in making his final recommendation to the Commission. The authority and responsibility to decide whether to approve or deny each application rests with the Commissioners.

VI. SCOPE OF COMMISSIONER REVIEW

To make a recommendation to the full Commission regarding the approval or denial of each application, the RFP states that the Applications Committee will consider the following:

- Executive Director (Staff) recommendation
- Evaluation Team Recommendation Report, Applicant Response, Evaluation Team rebuttal
- Public hearing testimony
- DOE comments

Applications Committee Meeting

At the Applications Committee Meeting on June 29, 2017 applicant group members Randy Shiraishi, Deborah Bond Upson, and Sheila Buyukacar testified in support of the IMAG application. Members of the public Dr. Lois Lynn Deuel and Laura Julius also testified in support and the Commission received written testimony in support from 35 individuals, and a petition with 400 names in support. The Committee did not take action on the IMAG application, and chose to defer action on this application to the full Commission.

Exhibit A

Evaluation Team Recommendation Report for IMAG Academy



State Public Charter School Commission 2016-2017 Recommendation Report

Charter Application for
IMAG Academy

Evaluation Team

Team Lead: Danny Vasconcellos

Evaluators: Beth Bulgeron

Amy Cheung

Derek Scott Hall

Cindy Henry

Sylvia Silva

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 2016-2017 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

Building off of the advice and training from national experts and experience gained in the last application cycle, the Commission’s Operations Section created standardized evaluation forms, provided evaluator training, and assembled the Evaluation Team based on the national best practices, policies, and standards needed to authorize high-performing charter schools. The highlights of the process are as follows:

Proposal Evaluation. The Evaluation Team conducted individual and group assessments of completed applications. The Commission’s Operations Section conducted a completeness check to ensure the Evaluation Team only reviewed complete submissions.

Capacity Interview. After the initial review, the Evaluation Team conducted an in-person assessment of the applicant’s capacity. The interview also served to clarify some areas of the application.

Request for Clarification. After receiving initial clarification through the capacity interview, the Evaluation Team identified any areas of the application that required further clarification. Applicants had the opportunity to respond to the Evaluation Team’s Request for Clarification in writing to address these issues.

Due Diligence. The Evaluation Team considered any other available information relevant to each application.

Consensus Judgment. The Evaluation Team came to consensus regarding 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 Commission’s Executive Director, with assistance from the Operations Section, is charged with reviewing this recommendation report, the testimony at public hearings, comments from the Department of Education, and other information obtained during the application process in making his final recommendation to the Commission. The authority and responsibility to decide whether to approve or deny each application rests with the Commissioners.

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

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.
Falls Far Below the Standard	The response does not meet the criteria in most respects, is undeveloped or significantly incomplete; demonstrates lack of preparation; raises substantial concerns about the viability of the plan; or the applicant's capacity to carry it out.

Evaluation Report

A report, attached as **Appendix A**, detailing the strengths and weakness of the proposal based on evaluation criteria.

Proposal Overview

Proposed School Name

IMAG Academy

Mission and Vision (as described by the applicant)

Mission:

“IMAG Academy’s mission is to uncover a student’s strengths and potential through engaging in community-centered concerns and projects in a safe, family-like environment that is accepting, supportive, and nurturing.”

Vision:

“Our vision is to become a community resource raising generations of innovative, mindful, accepting, and giving (IMAG) citizens grounded in their knowledge and capabilities to create and sustain ethnically diverse, successful, and peace-filled communities.”

Geographic Location and Anticipated Student Population (as described by the applicant)

“IMAG Academy will be located within the boundaries of the city of Waipahu. It is surrounded by the cities of Kapolei, Ewa, Ewa Beach, Pearl City, and Mililani, known as the central leeward area. The area has over 44,000 of the 180,000+ students within the public school system spread across some of the largest campuses within all school levels.

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

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

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

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

Top Five Largest Campuses in Hawaii (SY 2015-16)					
High Schools Grades 9-12	Students Enrolled	Intermediate Middle	Students Enrolled	Elementary Grades K-6	Students Enrolled
Campbell*	3049	Mililani Middle (6-8)*	1836	August Ahrens*	1291
Mililani*	2514	Kapolei Middle (6-8)*	1438	Holomua*	1231
Waipahu*	2475	Waipahu Inter (7-8)*	1339	Ewa*	1086
Farrington	2316	Maui Waena (6-8)	1143	Waipahu Elem*	1078
Kapolei*	2038	Kaimuki Middle (6-8)	1008	Maili	1015

*- Central Leeward Area School

“Priority #2: Although the schools in our complex and surrounding area are doing great things, there are students not engaging in these phenomenal programs. Some of the statistics of our complex area and surrounding areas are presented below. As we’ve accepted the percentages of these statistics as normal and acceptable, of particular concern is when these percentages are converted to represent an actual person. The number of students not achieving and in some cases dropping out of school are astounding. As a community resource and an educational partner, IMAG Academy would become part of the great programs offered by the complex areas and be able to provide an option to these concerns.”

Annual High School Statistics – Central Leeward Area					
High Schools	Students Enrolled	% of Drop Outs	# of Drop Outs	4 yr % of Graduate	# of Students NOT Graduating
Waipahu	2475	17.1%	423	79.8%	500
Campbell	3049	11.0%	335	86.7%	406
Kapolei	2038	13.4%	273	84.6%	314
Leilehua	1699	17.7%	301	82.2%	302
Mililani	2514	5.2%	131	92.9%	178
Total # of Students	11775		1463		1700

Source: School Status & Improvement Reports – SY 2015-16

Achievement Performance – Test Scores – Waipahu												
	School	Grades	# Students Enrolled	English			Math			Science		
				# of Students NOT Met	Met %	Complex	# of Students NOT Met	Met %	Complex	# of Students NOT Met	Met %	Complex
1	August Ahrens	K-6	1291	671	48%		658	49%		723	44%	
2	Honowai	K-6	723	477	34%		448	38%		484	33%	
3	Kaleiopuu	K-6	867	486	44%		477	45%		460	47%	
4	Waikele	K-6	604	278	54%		332	45%		344	43%	
5	Waipahu	K-6	1078	722	33%	54%	733	32%	54%	582	46%	60%
6	Waipahu Inter	7-8	1339	870	35%	46%	924	31%	41%	844	37%	40%
7	Waipahu High	9-12	2475	1262	49%	58%	1708	31%	36%	1733	30%	33%
	Totals		8377	4,767			5,280			5,169		

Source: StriveHI School Accountability Reports – SY 2015-16

“Dissemination of knowledge to others. We are driven by our vision to be a community resource and we

have purposefully built our school organization to collaborate and share. Our schedule invites partners from the community, including other schools. In addition, IMAG Academy Lab is specifically designed as a collaborative space for students, partners, parents and educators to come together and experience learning and innovative solution development with our community opportunities and concerns in mind.”

Enrollment Summary (as described by the applicant)

Grade Level	Number of Students											
	Year 1		Year 2		Year 3		Year 4		Year 5		Capacity	
	2018		2019		2020		2021		2022		2023	
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	25	--	50	--	50	--	50	--	50	--	50	--
1	25		25		50		50		50		50	
2			25		25		50		50		50	
3					25		25		50		50	
4							25		25		50	
5									25		50	
6	25		25		25		25		25		50	
7	50		50		50		50		50		50	
8	50		50		50		50		50		50	
9	50		75		50		50		75		75	
10			50		75		75		75		75	
11					50		75		75		75	
12							50		75		75	
Subtotals	225	0	350	0	450	0	575	0	675	0	750	0
Totals	225		350		450		575		675		750	

Executive Summary

IMAG Academy

Recommendation

Deny

Summary Analysis

The recommendation of the Evaluation Team is to deny the application for IMAG Academy since the applicant did not meet the standard in three of the four core areas of the application. The applicant satisfied the criteria for the academic plan but did not meet the standard for approval with its organizational plan, financial plan, and applicant capacity.

The academic plan meets the standard since it is well-researched, grounded in best practices and provides a comprehensive framework for rigorous, high-quality instructional design that is aligned to academic standards. The instructional model teaches the whole child, is comprehensive, robust, and speaks to the mission and vision of the school, and leverages partnerships with community members in order to bring relevancy to learning.

The organizational plan does not meet the standard as the plan lacks important details, does not provide enough specific information in one or more areas, and fails to align with the academic and financial plans. The applicant's organizational plan also includes conflicting plans for school operations and inconsistencies in the organizational structure related to its plan to contract with Ho'okako'o Corporation for school management services.

The financial plan does not meet the standard since the plan raises concerns about the school's viability and the financial team's capacity. The school has secured a cost reimbursement federal grant to fund its start-up activities; however, the school does not have sufficient funds to cover the actual expenses prior to any federal reimbursements for the start-up year.

The applicant's capacity does not meet the standard because it has not demonstrated that it has the organizational and financial capacity to open a high quality charter school. Additionally, although the academic plan as written meets the standard of approval, the proposed school director lacks a demonstrated record of accomplishment related to improving student outcomes, and does not have experience managing a project of this scope. There is also concern regarding the ability of the applicant to successfully launch a slow growth model of three school divisions (elementary, middle, and high) simultaneously. In all, following the review of four core areas of the application, the applicant has not demonstrated that it is ready to open and operate a high-quality charter school.

Summary of Section Ratings

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

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

Academic Plan

Meets 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

IMAG Academy

Rating

Meets the Standard

Plan Summary

The applicant states that the key components of its educational model are:

- 1. A Safe & Nurturing Environment - Social-Emotional and Communication Development*
- 2. Relevant Connections - Engaged and Deeper Learning*
- 3. Academic Rigor - Content, Performance and Skills Mastery*

These key components provide IMAG Academy with an educational program that celebrates achieving high academic and social expectations. Non-negotiable, this 3-prong approach ensures a 360 degree support system where all members of our community can excel and thrive. As important, this combination ensures students will be able to provide their and our community's voice as they engage, succeed and thrive in solving real world concerns and opportunities. The ultimate success, as prescribed by our student outcomes, is when innovation, mindfulness, acceptance, and giving are inherent within our student's decision making process and solutions."

Analysis

The academic plan of IMAG Academy **meets the standard** for approval because it is well-researched and grounded in best practices. Additionally, the academic plan provides a comprehensive framework for rigorous, high-quality instructional design that is aligned to academic standards.

As outlined in the application, the instructional materials and methods were selected based on sound evidence that they have been proven successful. Particular areas of strength in the application are (1) an instructional model that teaches the whole child, is comprehensive, robust, and speaks to the mission and vision of the school, and (2) leverages partnerships with community members in order to bring relevancy to learning.

The academic plan has a proactive, rather than reactive, approach to supporting the academic and behavioral needs of all students. Having "productive and positive social, emotional and communication skills" as a foundation to improving academic performance is supported by research, and it is evident within the application that this link is understood well by the applicants.

Despite the academic plan's strength, the Evaluation Team had concerns regarding the start-up plan, specifically launching a slow growth model that starts entry level grades for elementary, middle, and high school divisions in the first year. Starting elementary, middle, and high school divisions simultaneously requires consideration and implementation of three very different needs pertaining to professional development, curriculum development, supplies, and supports for each distinct student group. The applicant's staffing plan for Year 1 provides for only two administrators, the school director

and an Academic Coordinator, to oversee the opening of a brand new charter school serving over 200 elementary, middle, and high school students.

Organizational Plan

IMAG Academy

Rating

Does Not Meet the Standard

Plan Summary

The IMAG Academy proposes a governance structure made up of the governing board, advisors, an advisory board, and school director. There is also the IMAG Foundation, an associated nonprofit organization that will support the school in funds development, fundraising, fiscal sponsorship/agency, and strategic visioning assistance.

The governance philosophy of the IMAG Academy School Governing Board is to be the ethical, legal, and financial stewards of the academy. It will be responsible to represent and maintain the school's vision and mission, while being responsive to the School Director and other stakeholders, in its charge of academic success and the sustainability of the school.

IMAG Academy governing board proposes to use a committee/task force structure to support well-informed decisions. The standing committees will be Board Development, Executive, Finance, Facilities, Governance, and Academic Performance. Committees/task forces will provide for focused research, deeper discussion and vetted solution recommendations. The Governing Board is charged with responsibilities, and each responsibility enhances the use of best practices to ensure academic, organizational and financial success.

Analysis

The organizational plan **does not meet the standard** as the plan lacks important details, does not provide enough specific information in one or more areas, and fails to align with the academic and financial Plans.

The organizational plan, specifically the facility plan, fails to show an alignment between facility options and the proposed academic plan. The academic plan describes a "School Family" culture based on relationships formed by collaboration, mentorship, and collegiality between all school members and across all grade levels. The plan for culture supports the school's values by creating a safe learning environment in which older students mentor younger students and teachers and staff develop a collaborative culture and sense of community through frequent interactions and connections.

The facility plan provided includes options for the school to operate at multiple sites for the different grade divisions. The applicant did not adequately clarify or explain how culture would be preserved if the school operated at multiple sites. The applicant's explanation that older students would move between the multiple sites present safety concerns as this would require students to travel frequently in the predominantly busy, commercial area, for "School Family" activities, such as mentoring or other

whole-school assemblies. During the capacity interview, the applicant failed to describe any specific safety plan or special measures to address students and staff travel between sites.

The applicant's organizational plan also includes conflicting plans for school operations and inconsistencies in the organizational structure that hinder the Evaluation Team's ability to properly evaluate the viability of the organizational plan. IMAG Academy's application includes a Memorandum of Understanding (MOU) with Ho'okako'o Corporation that explains that the organization will serve as a resource for school management to the the school governing board and administration and assist in implementing best practices for organizational and financial management and accountability. The MOU states that upon approval of the school's charter application, the use of Ho'okako'o Corporation's contracted management services would be evaluated by the two entities.

The conflicting plans for school operations is illustrated in the staffing chart provided in the application where staff positions for the Business Manager, Account Clerk, and Registrar have been assigned and budgeted for. In addition, within the organizational plan and the financial plan sections, the applicant repeatedly assigns key leadership and control functions and duties to the Business Manager and Registrar positions. However, at the capacity interview, the applicant stated that Ho'okako'o Corporation would provide Business Manager, Account Clerk, and Registrar services to the school.

The inconsistency regarding the school's organizational structure within the application limits the Evaluation Team's ability to effectively review and assess the viability of the organizational plan, and the application as a whole as there are financial and capacity impacts in the school's use of Ho'okako'o Corporation. For example, in the financial contingency plan, should the school not meet its enrollment projections, the school will take several actions to reduce expenses and among the first actions listed is a reduction to the Business Manager position. It is unclear how this would affect the proposed school's relationship and arrangements with Ho'okako'o Corporation.

Another area of concern for the applicant's organizational plan is the relationship between the proposed governing board and the non-profit organization affiliated with the proposed school, IMAG Foundation. Currently, the leadership of IMAG Foundation consists of the proposed school director and the proposed chair of the school's Governing Board. This represents more than half of the foundation's voting members and generates concerns pertaining to the responsibilities and duties of the governing board and the responsibilities and duties of the non-profit. This is of particular concern as IMAG Foundation is responsible for the management of a federal grant awarded to the applicant. Should the applicant be approved, the applicant will need to consult with and receive guidance from the State Ethics Commission to address and potential conflicts of interest.

Financial Plan

IMAG Academy

Rating

Does Not Meet Standard

Plan Summary

The IMAG Academy’s financial leadership team will be comprised of the governing board, board treasurer, school director, and business manager. The proposed charter school intends to contract with Ho`okako`o Corporation for financial management services.

The financial plan provides an operating budget between \$200,295 and \$2.9 million from the start-up year to year three. The school has been awarded a three-year USDOE grant for \$750,000. Budgeted revenues, expenses, and operating gains or losses for years zero through three are presented in the following table:

Year	Total Operating Revenue	Total Operating Expenses	Total Operating Gain/(Loss)
0	\$200,295	\$192,617	\$7,678
1	\$1,759,505	\$1,432,492	\$327,014
2	\$2,527,173	\$2,119,121	\$408,053
3	\$2,925,000	\$2,725,171	\$199,830

Analysis

The financial plan for IMAG Academy **does not meet the standard** because the plan raises concerns about the school’s viability over the years presented in the budget and the financial team’s capacity.

The applicant did not provide a clear description that gives reasonable assurance that it will have strong internal controls and ensure compliance with all financial reporting requirements. IMAG identifies a financial leadership team, however, it does not identify specific internal control processes and procedures and descriptions of how internal controls will be implemented by the team.

Another fiscal challenge is that the school does not have sufficient funds to cover for the actual expenses prior to any federal reimbursements for the start-up year. The start-up year is solely

dependent on the federal award of \$200,295, part of a three-year USDOE grant of \$750,000. At the capacity interview, the applicant stated that access to the federal funds is through a cost-reimbursement basis. Lacking start-up capital may severely impact the school's ability to implement its academic and organizational plans.

Lastly, the financial plan does not support the school's plan to partner with Ho`okako`o for the services that it will provide through its non-profit. The budget reflects positions which conflicts with information provided at the capacity interview. While the school presented a memorandum of understanding between school and Ho`okako`o, it was apparent at the capacity interview that the type of services to be provided and the associated costs remain unknown. This is an indication that the applicant has not thoroughly thought through all of these important functions that would place the proposed school at risk for failure.

Evidence of Capacity

IMAG Academy

Rating

Does Not Meet Standard

Plan Summary

The applicant states that, “ *Collectively, this group has proven their ability to design, implement academic programs in schools [sic]. They have built the administrative backbone (policies, processes, and procedures) that will support our school. Success in curriculum, instruction and assessment is an essential requirement in the many endeavors accomplished by this group. The use of a holistic set of performance management measurements will aid this group in the school’s capability to see academic, organization and financial concerns with short and long term views. All members have designed programs that ensured family and community engagement. Their design for The IMAG Academy takes their collective lessons learned into consideration.*”

Analysis

Overall, the applicant does not demonstrate the capacity to open and manage a high quality charter school as the applicant has not met the standards for organizational and financial capacity.

The academic plan meets the standard for approval and generally the applicant has provided sufficient evidence that its key members possess the collective qualifications to implement the proposed school’s academic plan. However, the proposed school director lacks a demonstrated track record of improving student outcomes or even the experience managing a project of this scope. Tied to this lack of experience, there was concern regarding the ability of the applicant to successfully launch a slow growth model for three school divisions (elementary, middle, and high) simultaneously.

During the capacity interview, the applicant’s academic team members demonstrated a deep knowledge of the proposed academic model and presented an adequate understanding of the needs of students and families particular to the Waipahu community.

The applicant does not demonstrate the capacity to implement the proposed organizational plan. The applicant does not present a coherent view of its organizational structure as there are the inconsistencies within the application on how Ho’okako’o Corporation will be used. The organizational plan does not align with the academic Plan as “School Family” culture and facility plans appear to be incongruent. In addition, there are potential conflict of interest concerns regarding the overlap in membership of the proposed school governing board and the affiliated non-profit organization. While a supportive partnership with a quality organization and the School Family Framework are strengths in this application, the applicant was not able to a develop cohesive organizational plan, calling into question the applicant’s organizational capacity as a whole.

The application does not meet the standards for financial plan capacity. The applicant did not present a financial plan to meet the standards required to demonstrate their collective financial management capacity, including the technical capacity to administer a cost reimbursement grant.

The application also contained certain information that conflicts with information presented in their capacity interview. Specifically, the applicant lists Ho`okako`o as a service provider for fiscal services, however, the financial plan submitted by the applicant lists the services to be provided by positioned employees of the proposed school.

Evaluator Biographies

Beth Bulgeron

Ms. Bulgeron is the Commission's Academic Performance Manager. She previously was the administrator of the school improvement section in the Hawaii Department of Education's Office of Curriculum, Instruction and Student Support. She has experience as an intermediate and high school administrator and was the founding principal of a Chicago high school. She has developed standards-based curriculum and assessments for public school districts and charter schools in several states and has served as a curriculum consultant. Prior to that, she taught for seven years. She earned her BA at the University of Wisconsin, Madison and her JD and LLM in Education Law and Policy at the University of the Pacific, McGeorge School of Law.

Amy Cheung

Ms. Cheung is the Commission's Financial Performance Manager. She previously worked as a Senior Auditor with the City and County of Honolulu, Office of the City Auditor. She is a certified public accountant in California and has also worked for other government and non-profit agencies including the California Victim Compensation and Government Claims Board, the State Office of the Auditor, Hawaii State Legislature, the Queen's Medical Center, and the California State Controller's Office. She earned her BS in Business Administration and Accountancy from California State University, Sacramento and a MBA from Hawaii Pacific University.

Derek Scott Hall

Mr. Hall is the Commission's Financial Performance Specialist. He previously served as the Participant Accounting Supervisor for the Hawaii Employer-Union Health Benefits Trust Fund. He is a graduate of Montana State University.

Cindy Henry

Ms. Henry is an Educational Specialist in the Hawaii Department of Education's School Transformation Branch. She previously worked at the Commission as the Education Specialist/Title 1 Linker. She has twenty years of education experience, including teaching in a variety of settings in California, as well as serving as a Regional Program Director and Director of a charter school. She has a BA in Sociology from Chico State University and a MA in Education from Grand Canyon University.

Sylvia Silva

Ms. Silva is the Commission's Organizational Performance Specialist. Prior to working at the Commission she worked for its predecessor agency, the Charter School Review Panel (CSRP). Before her work in charter school authorizing she had 7 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 BA in Business Administration from Chaminade University of Honolulu.

Danny Vasconcellos

Mr. Vasconcellos is the Commission's Organizational Performance 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
2016-2017 Evaluation Report for IMAG Academy

Evaluation Criteria Overview

The Application Requirements and Criteria are the essential tools for the Evaluation Team, used in both their individual and team assessments of each application. The Evaluation Team presents both ratings on a scale and narrative analysis of each section of the application as compared to the Application Requirements and Criteria. Throughout the application evaluation process, evaluators will update their analysis to include additional information (due diligence, 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:

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.
Falls Far Below the Standard	The response does not meet the criteria in most respects, is undeveloped or significantly incomplete; demonstrates lack of preparation; raises substantial concerns about the viability of the plan; or the applicant’s capacity to carry it out.

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

Throughout the evaluation of the application, the Evaluation Team assessed the applicant’s capacity to execute the plan as presented. In total, 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
 Falls Far Below the Standard

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.

Strengths:

IMAG's application describes a comprehensive and well organized list of outcomes.

Weaknesses:

None.

Criterion II.B.2

A clear description of the rigorous academic standards that will be used at the proposed school including:

- A rationale for inclusion each set of standards that the proposed school plans to adopt that demonstrates an understanding of how each set of standards will contribute to the success of student learning under the Academic Plan; and
- A clear articulation of how the standards based curriculum will be aligned to standards-based instruction, standards-aligned formative and summative assessments and standards-based grading and reporting of student progress.

Strengths:

IMAG's application provides a thoughtful response that uses the DOE toolkit and evidences understanding of the relevant standards necessary to be identified.

<p>Weaknesses: None.</p>
<p>Criterion II.B.3 A reasonable and sound timeline and description of how instructional materials will be developed or selected and a list of individuals that will be involved in the development or selection process. If the instructional materials have been selected, a description and explanation that clearly demonstrates how the materials support the Academic Plan. If the proposed Academic Plan includes a <i>virtual or blended learning program</i>, include a clear description of the virtual learning curriculum program(s) and a reasonable rationale for the selection of the curriculum program(s).</p>
<p>Strengths: IMAG's recognition of the need for curriculum-to-project alignment is a strength.</p>
<p>Weaknesses: None.</p>
<p>Criterion II.B.4 A clear list of academic goals and targets and a description of how the proposed school assesses the progress of individual students, student cohorts, and the school as a whole on the identified goals and targets. The description must clearly explain how the identified assessments will accurately measure progress toward the identified goals and targets.</p>
<p>Strengths: IMAG's comprehensive description and identified tools for assessment that are research based and will measure progress toward goals.</p>
<p>Weaknesses: None.</p>
<p>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.</p>
<p>Strengths: IMAG adequately met this criterion.</p>
<p>Weaknesses: None.</p>
<p>Criterion II.B.6 A clear description of the instructional strategies that the proposed school will use that adequately explains how these strategies support the mission, vision, and academic philosophy of the proposed school and are well-suited to the anticipated student population. The description must also include the interventions and modifications that will be made to instructional strategies if students are not meeting identified goals and targets. If the proposed school's Academic Plan contains a <i>virtual or blended learning program</i>, the description must adequately explain how the proposed instructional strategies will work with the virtual learning components to result in a coherent instructional program.</p>
<p>Strengths: IMAG's application is detailed and included evidence.</p>

Weaknesses:

None.

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.

Strengths:

IMAG adequately met this criterion.

Weaknesses:

None.

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 policies.
- 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.

Strengths:

N/A

Weaknesses:

N/A

Section II.C: Special Populations and At-Risk Students

<input checked="" type="checkbox"/> Meets the Standard	<input type="checkbox"/> Does Not Meet the Standard	<input type="checkbox"/> Falls Far Below the Standard
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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.

Strengths:

IMAG's application included an easy to follow graphic organizer.

Weaknesses:

None.

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.

Strengths:
 IMAG adequately met this criterion.

Weaknesses:
 None.

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.

Strengths:
 IMAG adequately met this criterion.

Weaknesses:
 None.

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.

Strengths:
 IMAG adequately met this criterion.

Weaknesses:
 None.

Section II.D: Academic Performance Management

Meets the Standard Does Not Meet the Standard Falls Far Below the Standard

Criterion II.D.1
 Comprehensive and effective plans for evaluating and monitoring academic performance that explain how the proposed school will measure and evaluate performance data, including:

<p>Academic Performance Data Evaluation Plan. A comprehensive and effective plan and system for:</p> <ol style="list-style-type: none"> 1. 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; 2. 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 3. Reporting the data to the school community.
<p>Strengths: IMAG adequately met the criterion.</p> <p>Weaknesses: None.</p>
<p>Criterion II.D.2 A clear description of thoughtful, appropriate corrective actions the proposed school will take if it falls short of:</p> <ol style="list-style-type: none"> 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.
<p>Strengths: IMAG adequately met this criterion.</p> <p>Weaknesses: None.</p>

Section II.E: School Culture		
<input checked="" type="checkbox"/> Meets the Standard	<input type="checkbox"/> Does Not Meet the Standard	<input type="checkbox"/> Falls Far Below the Standard
<p>Criterion II.E.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.</p>		
<p>Strengths: IMAG’s plan to create a school culture with positive academic and social environment is detailed and comprehensive.</p> <p>Weaknesses: None.</p>		
<p>Criterion II.E.2 A sound plan for developing a proposed school culture that is conducive to a safe learning environment for all</p>		

<p>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.</p>
<p>Strengths: IMAG’s use of a research-based framework is sound and addresses the needs of all learners.</p> <p>Weaknesses: None.</p>
<p>Criterion II.E.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.</p>
<p>Strengths: IMAG’s use of advisors to monitor student progress on their NEXTGEN plans is a reasonable way to intentionally expose all students to post-secondary options. IMAG described a clear Organizational and Academic model that includes community centered exposure to community professionals and leaders.</p> <p>Weaknesses: None.</p>
<p>Criterion II.E.4 <u>Student Discipline.</u></p> <ol style="list-style-type: none"> 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.
<p>Strengths: IMAG demonstrates a solid understanding of Hawaii DOE Chapter 19.</p> <p>Weaknesses: None.</p>

Section II.F: Professional Culture and Staffing		
<input checked="" type="checkbox"/> Meets the Standard	<input type="checkbox"/> Does Not Meet the Standard	<input type="checkbox"/> Falls Far Below the Standard
Criterion II.F.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.

Strengths:

IMAG's focus on creating a safe and nurturing environment for all members of the school community is a good strategy to address challenges of economically disadvantaged students. MLSS system with early intervention also commendable.

Weaknesses:

None.

Criterion II.F.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.

Strengths:

- a. IMAG's description of how PD will be developed is well thought out and includes a comprehensive list of how to identify what PD needs to occur.
- b. IMAG's PLC plan, along with various meeting schedules, and summer in-service programs will effectively support the academic plan.
- c. IMAG's plan to attain a supplemental agreement to extend the school day for teachers is evident, as well as a contingency plan if unable to get an approved supplemental agreement that includes use of grant funds already received.

Weaknesses:

- a. IMAG’s plan to conduct observations of new teachers should be more frequent than quarterly or semi-annually in order to ensure induction program is effective.
- b. IMAG Board member’s experience, training and capacity might not align with the training and experience needed to effectively implement the Principal evaluation tool.

Criterion II.F.3

Staff Structure

- a. A complete staffing chart for the proposed school, using the Staffing Chart Template (**Exhibit 2**) and provided as Attachment F (required form), 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.

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.

Strengths:

IMAG’s staffing plan supports academic plan by providing direct support for both academic and social emotional needs.

Weaknesses:

None.

Criterion II.F.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

<p>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 (no page limit) and any teacher evaluation tool(s) as Attachment H (required attachment, no page limit) 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.</p> <p>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.</p> <p>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.</p>
<p>Strengths: IMAG's plan provides a realistic and viable timeline. Effective plan and satisfactory knowledge of bargaining unit challenges and solutions.</p> <p>Weaknesses: None.</p>

Section II.G: School Calendar and Schedule		
<input checked="" type="checkbox"/> Meets the Standard	<input type="checkbox"/> Does Not Meet the Standard	<input type="checkbox"/> Falls Far Below the Standard
<p>Criterion II.G.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 (no page limit), and a satisfactory explanation of how the calendar aligns with and clearly reflects the needs of the Academic Plan.</p>		
<p>Strengths: IMAG adequately met the criterion.</p> <p>Weaknesses: None.</p>		
<p>Criterion II.G.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:</p> <p>a. A description of the length and schedule of the school week.</p> <p>b. A description of the length and schedule of the school day including start and dismissal times.</p> <p>c. The minimum number of hours or minutes per day and week that the proposed school will devote to academic instruction in each grade.</p>		

- 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 (required attachment, no page limit), a sample weekly student schedule for at least one grade that is representative of each level the school intends 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 (required attachment, no page limit), 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 (required attachment, no page limit), 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.

Strengths:
 If IMAG’s supplemental agreement is approved, the proposed schedule will support the academic plan.

Weaknesses:
 None.

Section II.H: Supplemental Programs		
<input checked="" type="checkbox"/> Meets the Standard	<input type="checkbox"/> Does Not Meet the Standard	<input type="checkbox"/> Falls Far Below the Standard
<input type="checkbox"/> Not Applicable		
<p>Criterion II.H.1 If applicable, a description of a sound plan for any summer school programs the proposed school will offer that will meet anticipated student needs, including a clear explanation for how the programs are integral to the proposed school’s academic plan, a reasonable schedule and length of the program, and sound funding plan for the programs. If the programs will not be implemented in the first year of operation, the plan must describe the timeline for implementation.</p>		
<p>Strengths:</p>		

IMAG's development of intersession and summer programs align with proposed school's mission/vision and were developed based on anticipated student population family needs.

Weaknesses:

None.

Criterion II.H.2

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

Strengths:

IMAG's plan will address academic needs of struggling students.

Weaknesses:

IMAG's plan does not offer any enrichment opportunities.

Section II.I: Third Party Service Providers

Meets the Standard Does Not Meet the Standard Falls Far Below the Standard

Criterion II.I.1

Service Provider Selection and Track Record

a. A reasonable explanation of why the applicant is seeking to contract with a Service Provider rather than operate the proposed school(s) directly.

b. A description of a thorough process that the applicant used to identify, vet, and select the Service Provider. The description must explain how and why the Service Provider was selected, including when and how the applicant learned of the Service Provider, which other Service Providers were considered, why the Service Provider was selected over other Service Providers, and what due diligence was conducted, including a summary of the findings of the reference checks conducted by the applicant.

c. If the Service Provider is providing academic services, evidence demonstrating academic success, especially in the grade levels the proposed school intends to serve, including academic performance data of all clients of the Service Provider that demonstrates the provider's services lead to *high-quality charter schools*, as defined in the RFP. Provide, as Attachment L (no page limit), academic performance data for each of the Service Provider's charter school clients that shows evidence of strong academic results for the past three years (or over the life of the charter school, if the school has been open for fewer than three years), based on the following factors:

i. Increased student academic achievement and attainment (including, if applicable and available, high school graduation rates and college and other postsecondary education enrollment rates) for all students, including, as applicable, *educationally disadvantaged students*, as defined in the RFP, served by the charter school;

ii. Either—

1. Demonstrated success in closing historic achievement gaps for the following subgroups of students at the charter school: low-income students, students from major racial and ethnic groups, students with disabilities, and English language learners; or

2. No significant achievement gaps between any of those subgroups of students at the charter school and significant gains in student academic achievement for all populations of students served by the charter school; and

iii. Results (including, if applicable and available, performance on statewide tests, annual student attendance and retention rates, high school graduation rates, college and other postsecondary education attendance rates, and college and other postsecondary education persistence rates) for low-income and other *educationally disadvantaged students* served by the charter school that are above the average academic achievement results for such students in the state.

d. A listing and explanation of any management contract terminations, charter revocations, non-renewals, or withdrawals or non-openings that the proposed Service Provider has experienced in the past five years that does not indicate that the Service Provider lacks the necessary capacity or display inconsistencies in its academic, organizational, or financial performance. The explanation must reference the other jurisdictions where the Service Provider operates or services other charter schools and provide, as Attachment M (no page limit), a list of all the charter schools operated or managed by the Service Provider, the respective authorizer for each of those charter schools, and contact information for each authorizer.

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

Criterion II.I.2. Legal Relationships

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

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

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

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

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

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

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

Criterion II.I.3. Service Provider's Organizational Structure

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

negotiating.

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

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

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

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

Strengths:

None.

Weaknesses:

IMAG's response fails to satisfy this criterion and created a serious weakness in this application. As a result, the application team was not provided sufficient content on which to evaluate key components of the application.

Both organizations provide paid services to other charter schools, and if used will provide similar services to IMAG Academy. They meet the definitions of a Third-Party Service Provider.

Ho'okako'o Corporation is identified as a Charter Management Organization in the Memorandum of Understanding which is in Attachment AA.

In Attachment AA Athlos Academies identifies itself as "an Education Service Provider that works closely with charter schools throughout the United States...Athlos provides comprehensive services that include but are not limited to...When IMAG Academy becomes a chartered school in the state of Hawaii, Athlos Academies if prepared to offer needed services that meet state and federal guidelines and IMAG Academy is committed to partnering with Athlos Academies to provide agreed upon services..."

There is a Memorandum of Understanding for Ho'okako'o and IMAG Academy which states Ho'okako'o is a CMO. The letter from Athlos Academies establishes that it an ESP, which provides services to other charters and will perhaps provide similar services to IMAG Academy. A complete application required the inclusion of Section II-I.

III. Organizational Plan

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

Section III.A: Governance

The governing board's mission, vision, and philosophy are not separately rated by the evaluators. However, these mission and vision statements should align with the proposed school's mission and vision and other parts of the application. Proposed schools are strongly encouraged to designate or establish an associated nonprofit organization to assist with fundraising and other support activities, especially during the start-up period, but this is not a requirement.

Meets the Standard
 Does Not Meet the Standard
 Falls Far Below the Standard

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.

Strengths:

None.

Weaknesses:

It is unclear what is meant by "while being responsive to the School Director" and any impacts this may have on responsibilities of the governing board.

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).

Strengths:

None.

Weaknesses:

IMAG's response does not meet the standard because it doesn't meet all of the criteria. A description of the working relationship between the governing board and the proposed school is required. IMAG states "The implementation of the Governing Board's policies is the responsibility of the school's School Director" and while there is a description of the board's responsibilities, there isn't enough to provide a description of the board's working relationship with the school.

Criterion III.A.3

Organizational charts, provided as Attachment Q (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.

Strengths:

None.

Weaknesses:

The criterion requires an organizational chart and although IMAG provides their chart there are significant concerns over the inconsistencies in the application's proposal. The application does not provide a clear plan for an Organizational structure overall.

The Organizational Chart lists Business Manager and Registrar positions, in all years, with lines of authority flowing from the Business Manager position. In other sections of the application, IMAG also makes references that include Business Manager, and Registrar positions. The viability of the overall plan raises concerns in that sections that include the Business Manager and Registrar positions appear to conflict with the sections that identify Ho'okako'o Corporation as the provider of these functions.

The Business Manager and Registrar positions in the application appear to be responsible for important functions including key leadership responsibilities. Yet, if the Business Manager, Registrar, and Account Clerk positions are not hired, there is no contingency plan showing how these important functions are to be addressed. such as might be presented in the organizational charts provided by the applicant . The presentation of two possible plans introduces confusion into the application as well as concerns that there is no strong plan to support the applicant during implementation. This inconsistency evidences that this part of the application has not been thoroughly thought through.

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.

Strengths:

None.

Weaknesses:

The criterion requires a description of how the governing board will interact with any school management teams, essential partners, or advisory bodies. IMAG's application doesn't provide how the governing board will interact with Ho'okako'o Corporation or Athlos Academy as a management team or advisory body or essential partner. The application is unclear about whether or not IMAG Academy will have any interactions with Ho'okako'o Corporation or Athlos Academies.

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.

Strengths:

N/A

Weaknesses:

N/A

<p>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.</p>
<p>Strengths: IMAG added additional members with skills in legal and fundraising through grant writing, vetting educational partnerships/contracts, policy drafting, perhaps human resources for evaluation of school leadership.</p> <p>Weaknesses: None.</p>
<p>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:</p> <ol style="list-style-type: none"> 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 <i>high-quality charter school</i>, including academic, financial, legal, and community experience and expertise; c. Completed and signed Board Member Information Sheets (<u>Exhibit 4</u>) and resumes for each proposed governing board member, provided as Attachment R (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.
<p>Strengths: IMAG has assembled a board that has a wide range of the necessary skill sets that should foster a successful charter school. The board has also provided a detailed plan to recruit new members and develop the board.</p> <p>Weaknesses: None.</p>
<p>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</p>

<p>conference calls, videoconference, or web conference).</p>
<p>Strengths: IMAG adequately addressed the criterion.</p> <p>Weaknesses: IMAG’s response meets the criteria however it states “...and preliminary agreements with experienced local and mainland service providers with expertise in all areas...” There are concerns over the reference in this section to “service providers” yet the omission of section II.</p>
<p>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.</p>
<p>Strengths: IMAG’s board has developed the required policies.</p> <p>Weaknesses: There are concerns regarding the applicant and its affiliated non-profit organization. Currently, the proposed school director and the proposed chair of the governing board serve as officers on the board of the affiliated non-profit. IMAG will need to consult the State Ethics Commission to ensure that members serving simultaneously on the applicant board and the nonprofit board do not present any potential conflicts of interest.</p>
<p>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.</p>
<p>Strengths: IMAG’s board has identified and will be providing development training for board capacity from an identified source, the National Charter School Resource Center. This training will include governance best practices, tools to support the school leader, and assistance for the board’s decision-making process.</p> <p>Weaknesses: None.</p>
<p>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.</p>
<p>Strengths: None.</p> <p>Weaknesses: Question was not answered – no description of the ways how the non-profit will specifically support the school. In addition, it appears non-profit has a mission besides supporting IMAG but response doesn’t explain the competing</p>

interests for time and resources, or how the school will ensure it will be able to obtain outside supports from a non-profit that has competing priorities.

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.

Strengths:

None.

Weaknesses:

The criterion requires a list of current and identified nonprofit board members that is in compliance with the State Ethics Code. Based on previous opinions from the Hawaii Ethics Commission, there are concerns that the membership of IMAG Foundation presents potential conflicts of interest under the State Ethics Code.

Two of the three nonprofit members are either a school employee or the chair of the school's Governing Board and that both are in leadership positions, on both boards, or on the foundation's board and in the school, and this is a concern. This also raises concerns for the number of voting members that are viable on the nonprofit and thus its ability to support the charter school immediately and upon the awarding of a charter. There is a particular concern here since there is a heavy reliance in Year 0 on a federal grant and any other fundraising that may be needed to support any financial needs in the start-up plan or Year 0 purchases. These may or may not be concerns but a review by the Hawaii Ethics Commission is needed.

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](#).

Strengths:

None.

Weaknesses:

The Commission does not maintain student records – school will need a plan that ensures all student records go to the correct public school.

Response does not provide sufficient details, for example how does school plan to account for the school's property in order to transfer to the state?

Section III.B: Organizational Performance Management

Meets the Standard Does Not Meet the Standard Falls Far Below the Standard

Criterion III.B.1

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

- a. **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.

Strengths:
None.

Weaknesses:
Some indicators have a position assigned to gathering the information but others do not. IMAG states: “the information gathered will be interpreted by the School Director and used to inform decision making regarding individuals, cohorts, special groupings, as well as at the school level.” Response doesn’t answer the criteria that asks for identification of position that will be compiling and interpreting data for the governing board.

Criterion III.B.2
A clear description of thoughtful, appropriate corrective actions the proposed school will take if it falls short of:

a. 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.

Strengths:
None.

Weaknesses:
IMAG’s response in this section is sparse and does not provide a clear description of the specific corrective actions the board will take to address issues.

Section III.C: Ongoing Operations

Meets the Standard Does Not Meet the Standard Falls Far Below the Standard

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?

Strengths:
None, as the school will not provide daily transportation services.

Weaknesses:
IMAG did not provide the rationale for not providing daily transportation services.

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.

Strengths:

None.

Weaknesses:

The criterion requires sound plans for safety and security for students. While School Family culture is a wonderful strength in the application, during IMAG's capacity interview, the applicant failed to consider how multiple campuses or the commercial area could impact safety for students. IMAG's interview failed to provide any descriptions of any special measures to address concerns for student (and staff) safety and any risks regarding students safely crossing the street, or the level of traffic on the particular streets in the predominantly commercial area. The frequency of students who will need to cross the street for School Family activities, mentoring activities and other whole-school assemblies to create the School Family culture raises safety concerns. The impact of these concerns affect the applicant's ability to effectively implement the small learning environment and culture articulated in their Academic Plan.

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?

Strengths:

None.

Weaknesses:

While the applicant provides several food service options, it is unclear what option is preferred and will be focused on. In addition, the school financial plan does not include food service costs.

Section III.D: Student Recruitment, Admission and Enrollment

Meets the Standard Does Not Meet the Standard Falls Far Below 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.

Strengths:

IMAG has adequately addressed the criterion.

Weaknesses:

IMAG states that it may conduct meetings that are not formal IEP meetings, this is a concern; the applicant should clearly define what is discussed in these meetings.

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.

Strengths:

IMAG has adequately addressed the criterion.

<p>Weaknesses: None.</p>
<p>Criterion III.D.3</p> <p>An admission and enrollment policy, provided as Attachment S (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:</p> <ul style="list-style-type: none"> 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.
<p>Strengths: IMAG has adequately addressed the criterion.</p> <p>Weaknesses: None.</p>

Section III.E: Geographic Location and Facilities		
<input type="checkbox"/> Meets the Standard	<input checked="" type="checkbox"/> Does Not Meet the Standard	<input type="checkbox"/> Falls Far Below the Standard
<p>Criterion III.E.1</p> <p><u>Geographic Location.</u></p> <ul style="list-style-type: none"> 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. 		
<p>Strengths: IMAG has identified a specific area and has provided sufficient rationale for that choice.</p> <p>Weaknesses: None.</p>		
<p>Criterion III.E.2</p> <p><u>Facilities.</u></p> <ul style="list-style-type: none"> a. <u>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</u> 		

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 Criterion III.E.1, 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.

Strengths:

None.

Weaknesses:

IMAG failed to demonstrate how the school will deliver its values of a small learning environment, in a multi-site campus. During the capacity interview, IMAG stated that a multi-site facility is a possibility. In the interview IMAG’s team failed to consider how multiple campuses would affect the creation and maintenance of its School Family culture articulated in its Academic Plan. IMAG failed to show how a small and safe learning environment can be met in the chosen facility area. This proposed areas is in a commercially zoned area of Waipahu and would require IMAG to exist on a multi-site campus plan if they are unable to secure a single building that supports all the needs in the facility plan.

In addition, these issues will be compounded for the school in its future years, beginning with the second year. The school’s slow growth plan requires the addition of grade levels and increases to enrollment every year. If it cannot find a single facility to accommodate its smallest enrollment year the school will need to add buildings/occupancy capacity every year to accommodate the growing enrollment. The facility options available in the chosen area make it likely that the school will expand into additional buildings and likely spread out the distances between buildings.

Section III.F: Start-Up Period

Meets the Standard Does Not Meet the Standard Falls Far Below the Standard

Criterion III.F.1

A comprehensive, reasonable, and sound management plan for the start-up period, provided as Attachment U (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.

Strengths:

None.

Weaknesses:

Athlos Academies and/or Ho’okako’o Corporation’s roles in the operation of IMAG Academy and in the start-up plan are unclear. In addition, the Business Manager position is a funded position in the start-up plan but it is unclear whether this position will be a hired individual. Incongruent and conflicting information in the application regarding some of IMAG’s positions and service providers that affect the start-up plan raise concerns that impact the viability of the start-up plan. Without clear content, the plan cannot be properly evaluated.

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.

Strengths:

None.

Weaknesses:

The plan for leading the development of the school is not sound. The Business Manager position is a funded position in the start-up plan but it is unclear whether this position will be a hired individual or whether the functions will be provided by a third-party service provider. The impacts to the financial aspects of the plan may be unknown since the identification of the individuals or organizations providing the tasks are unclear. Again, the incongruent and conflicting information in the identification of who will lead the tasks of the implementation plan affect the school’s start-up. The lack of clarity in the plan hinders proper evaluation of a sound plan or of the capabilities for those individuals or organizations leading the development of the school.

Section III.G: Conversion Charter School Additional Organizational Information

<input type="checkbox"/> Meets the Standard	<input type="checkbox"/> Does Not Meet the Standard	<input type="checkbox"/> Falls Far Below the Standard
<input checked="" type="checkbox"/> 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 Falls Far Below the Standard

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.

Strengths:

None.

Weaknesses:

The applicant did not provide a clear description that gives reasonable assurance that the proposed school will have strong internal controls and ensure compliance with all financial reporting requirements. The RFP identifies the financial leadership team but lacks specifics of any internal control processes or procedures and how they will be implemented by the team.

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.

Strengths:

None.

Weaknesses:

The applicant did not provide a clear, complete description of the roles and responsibilities that demonstrates a strong understanding of financial oversight and management.

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.

Strengths:

None.

Weaknesses:

The applicant did not provide an adequate description of sound criteria and procedures for selecting vendors or contractors for any administrative services.

Section IV.B: Operating Budget

Meets the Standard Does Not Meet the Falls Far Below the Standard

	Standard	
Criterion IV.B.1		
Complete, realistic, and viable start-up and three-year operating budgets, provided through the Financial Plan Workbook (Exhibit 5) as Attachment Y (required form), that align to the Academic and Organizational Plans.		
<p>Strengths: None.</p> <p>Weaknesses: The budget is incomplete, unrealistic, and not viable for a charter school start-up.</p> <ol style="list-style-type: none"> 1. The start-up year is solely dependent on the federal award of \$200,295, part of a 3-year federal grant of \$750,000. Federal funds are generally provided on a cost-reimbursement basis. The School does not have sufficient funds to cover for the actual expenses prior to any reimbursements for Year 0, which may severely impact the School's ability to implement its academic and organizational plans. Without any funding, the School will begin Year 1 in a negative position. 2. The budget anticipates cash to trend downward from Year 0 to Year 3. By Year 3, the School's cash on hand will fall below the standard of 60 days for charter schools. 3. The Statement of Net Assets does not align with the Annual Budget. There is no carry-over funding from Year 0 to Year 3, yet the Statement of Net Assets shows balances of the federal award. <p>These concerns may put the state at-risk for potential fiscal liability.</p>		
Criterion IV.B.2		
<p>Budget Narrative. A detailed budget narrative that clearly explains reasonable, well-supported cost assumptions and revenue estimates, including but not limited to the basis for revenue 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:</p> <ol style="list-style-type: none"> 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 Z (no page limit), for any funds on which the proposed school's core operation depends (<i>e.g.</i>, 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 revenues are not received or are 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 revenue projections are not met in advance of opening. c. If the proposed school has a <i>virtual or blended learning program</i>, 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. 		
<p>Strengths: None.</p> <p>Weaknesses: The budget is incomplete, unrealistic, and not viable for a charter school start-up.</p>		

Section IV.C: Financial Performance Management

Meets the Standard Does Not Meet the Standard Falls Far Below the Standard

Criterion IV.C.1

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

- a. **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.

Strengths:

None.

Weaknesses:

The applicant did not provide a complete plan for evaluating and monitoring financial performance.

Criterion IV.C.2

A clear description of thoughtful, appropriate corrective actions the proposed school will take if it falls short of:

- a. **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.**

Strengths:

None.

Weaknesses:

The applicant did not provide a clear description of thoughtful, appropriate corrective actions related to the financial performance standards set in the Financial Performance Framework.

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 Falls Far Below the Standard

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.

Strengths:
Applicant team members demonstrated deep knowledge of the proposed academic model and presented an adequate understanding of the needs of students and families particular to the Waipahu community.

Weaknesses:
The proposed director lacks demonstrated success in improving student academic outcomes in a school leadership position and also lacks experience leading an initiative or project on this scale.

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.

Strengths:
The team demonstrated adequate knowledge and commitment to the community.

Weaknesses:
None.

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 AA (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

<p>the proposed school, if applicable.</p>
<p>Strengths: None.</p> <p>Weaknesses: The academic plan relies heavily on community partnerships that do not appear to be solidified. There is concern that the level of involvement that is required by community partnerships will require a commitment of time and work to develop that has not been realistically contemplated or planned for by the applicant team.</p>
<p>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 CC (required attachment, no page limit). The position description shall include:</p> <ul style="list-style-type: none"> 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 <i>high-quality charter school</i> 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. <p>Submit Attachment BB to indicate that the school director is known or unknown at the time of the application.</p> <ul style="list-style-type: none"> c. If known, identify the school director, and provide as Attachment BB (required attachment, no page limit) the school director’s resume including their academic and organizational leadership record.
<p>Strengths: None.</p> <p>Weaknesses: Requires a BA in Business OR Education only. Previous experience in school leadership and a demonstrated track record of school improvement or success in delivering student outcomes is not required or prioritized.</p>
<p>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 EE (required attachment, no page limit). The description must include:</p> <ul style="list-style-type: none"> 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

<p>for a thorough recruiting and selection process where candidates will be screened using rigorous criteria.</p> <p>Submit Attachment DD (required attachment, no page limit) to indicate that the business manager and registrar is known or unknown at the time of the application.</p> <p>c. If known, identify the individuals who will fill these positions and provide, as Attachment DD (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.</p>
<p>Strengths: Applicant introduced plan to work with Ho`okako`o.</p> <p>Weaknesses: None.</p>

Section V.B: Organizational Plan Capacity		
<input type="checkbox"/> Meets the Standard	<input checked="" type="checkbox"/> Does Not Meet the Standard	<input type="checkbox"/> Falls Far Below the Standard
<p>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 <i>high-quality charter school</i>) to implement the school’s Organizational Plan successfully. The evidence must include a description that:</p> <ol style="list-style-type: none"> 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. 		
<p>Strengths: IMAG has assembled a group with a wide variety of the skill sets necessary to support a successful charter school.</p> <p>Weaknesses: There is a lack of evidence to support that the applicant has the capacity to implement the proposed Organizational Plan. The Organizational Plan does not align with the Academic Plan as School Family culture and facility plans appear to be incongruent. In addition, there are potential conflict of interest concerns regarding the overlap in membership of the proposed school governing board and the affiliated non-profit organization. While a supportive partnership with a quality organization and the School Family Framework are strengths in this application, the applicant was not able to develop a cohesive organizational plan, calling into question the applicant’s organizational capacity as a whole.</p>		
<p>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 AA (as</p>		

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

Strengths:

The applicant’s use of Ho`okako`o Corporation as an essential partner could be beneficial for the proposed school.

Weaknesses:

The criterion asks for a description that identifies organizations, agencies, or consultants that are partners in the proposed school’s Organizational Plan and their planned roles. The application does not make it clear whether or not there will be outside organizations or consultants that will be essential partners in this work. The application in this section states “Ho`okako`o Corporation may be an essential partner in the implementation of our Organizational Plan”. There are concerns that the application’s uncertainty hinders it from being able to complete this section and hinders an appropriate evaluation of any intended roles.

Section V.C: Financial Management Capacity

Meets the Standard Does Not Meet the Standard Falls Far Below the Standard

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.

Strengths:

None.

Weaknesses:

IMAG did not demonstrate financial management capacity by the application responses or the interview.

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 AA (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.

Strengths:

IMAG’s use of Ho`okako`o Corporation as an essential partner could be beneficial for the proposed school.

Weaknesses:

The applicant did not fully describe Ho`okako`o’s involvement in planning, establishing, or implementing the proposed school’s Financial Plan.

Exhibit B

IMAG Academy Response to Evaluation Team Recommendation Report

IMAG Academy – 2016-17 Response to Evaluation Report

Interactive communication is essential during this important decision making process. We trust this document will be read by commissioners and used to inform this very important decision that affects the access to a proven best-in-class educational learning environment, teaching community and school organization. It has been combined to become the IMAG Academy.

This response will provide the essential insight into the simple misunderstandings and improper assumptions that have led to confusion and the negative comments and conclusions of IMAG Academy's Evaluation Report. Once these misunderstandings are rectified it will be clear that the approval of IMAG Academy's charter application is of no risk to the State or to the Charter School Commission, and its approval is of very high benefit to our students and community.

Once the improper assumptions and misunderstandings are corrected, it will be easily seen that...

~IMAG Academy has designed a family driven, student focused and community centered academic and school plan. It includes a strengthened organizational capacity supported by its returning and professionally experienced governing board, essential partnerships with extensive charter school experience and \$750,000 in planning and implementation start-up funding.

~IMAG Academy's school organization and financial management plan is well integrated to support the approved academic framework and the resulting learning, teaching and school strategies. Our capacity has been strengthened by the unyielding relationship we've established with a 12 year local, non-profit, successful veteran in charter school financial and back-office operations: Ho'okako'o Corporation.

~IMAG Academy's school leadership capacity is unshakable through our resourceful and resilient school director. Any perceived gaps in experience is strengthened by a network of seasoned charter school leaders in Hawai'i and on the mainland to include a partnership with project based learning veteran; Athlos Academies.

~IMAG Academy's financial funding, budget and capacity is a fortress and truly unique at this phase of a new start-up charter school. We are 1 of only 9 charter schools selected nationally to receive a 3 year US DOE charter school startup planning and implementation grant of \$750,000.

Our responses are focused on clearing up misunderstandings in the following areas, all of which were addressed through the application, interview and/or request for clarification document:

1. Our use of FTE support personnel within our application vs a third-party service provider that would directly operate the IMAG Academy
2. The access to start-up funds for cash flow (advance-request process) of our US DOE grant vs only strict cost-reimbursements
3. Our School Family culture and safety planning actually lessens multi-building facility concerns
4. IMAG Foundation's governing board member transitions and development

Section II - Academic Plan

Concern: *Launching of a growth model with grades in elementary, middle and high school*

Concern: *Staffing of only two administrators to oversee the school's opening*

Response: Although unconventional to start a portion of a primary and secondary school simultaneously, our plan fits our academic model and most importantly provides the surrounding community a synergistic, positive effect upon teacher collaboration and vertical integration for both faculty and student performance at the earliest possible time. Along with our IMAG Academy's design and foundational elements (shared below) put in place during Year 0, there are several factors that ensure our ability to succeed. Below are IMAG Academy's foundational elements that will enable and enhance our capacity to successfully launch our growth model across multi-school levels. These are identified as

- Defined academic model and shared pedagogy across all divisions with attention to individual needs of each grade level
- Varied expertise and experience of our governing board
- Time commitments of our governing board members and funded positions
- Use of our committee and task force structure
- Essential Partners' successful performance with charter school operations and financial mgt
- Extensive Implementation Plans and Timelines
- Full or Near Full-time Project Manager and Resourceful & Resilient School Director
- Supported and Supportive School-wide Practices
- Comprehensive personnel and partnership functionality alignment

Governing Board - Varied Expertise

Board Member Expertise (X= Experienced, @=Deeper level of experience)	Alane Thelma	Ames Shirley	Bond Deb	Buyuk Sheila	Hawkins Melissa	Nakata Michael	Shiraishi Randy	Wong Jessica	Hata Andrew
Governance, program or project mgt	x	x	x	@		x	@	@	
Non-profit administration			x		x	x	x	@	
Financial management	@		x	@					x
Educational leadership			@	@	@				
Labor relations, collective bargaining						x	@		@
Contract development, negotiations, etc	@	x	x	x		x	x		@
Human resource management			x				x		
Marketing, public relations, communications	@		@	x		@			
Funds development and/or fundraising						x		@	
Legal affairs									@
Strategic planning	x		@	x				x	
Policy making			x				@	x	
Facilities management		@		x					x

Source: Application – p 75

Implementation/Startup Time Commitments – Governing Board & Funded Position

		Hrs/day	Hrs/week	Weeks Avail	Days Avail	Commitment in Hours
1	Randy Shiraishi	Volunteer		20	40	800
2	Michael Nakata	Volunteer		20	40	800
3	Jessica Wong	Volunteer		10	40	400
4	Thelma Alane	Volunteer		5	40	200
5	Shirley Ames	Volunteer		5	40	200
6	Deborah Bond-Upson	Volunteer		5	40	200
7	Joe Evans	Volunteer		5	40	200
8	Andrew Hata	Volunteer		5	40	200
9	Melissa Hawkins	Volunteer		5	40	200
10	Sheila Buyukacar	Volunteer		40	40	1600
11	SASA (.5 FTE Jan-June)	Funded		20	26	520
12	Coach (.5 FTE Feb-Jun)	Funded		20	22	440
13	Bus Mgr (.5 FTE Jan-Jun)	Funded		20	26	520
14	Proj Coord (1 @ 15 days)	Funded	8		15	120
15	EAs (2 Eas @ 15 days)	Funded	7		30	210
16	Teachers (3 @ 15 days)	Funded	7		45	315
17	IT (1 @ 10 days)	Funded	8		10	80
	Total Commitment in Hours					7005

Source: Attachment U – Startup Plan

Governing Board – Committee and Task Force Commitments

Committee/Task Force	Committee Chair – Task Force Leaders
Funds Development Committee	Michael Nakata, Jessica Wong-Sumida
Startup Facilities Task Force Facilities Committee	Shirley Ames, Andrew Hata
Personnel Recruitment Task Force	Melissa Hawkins, Sheila Buyukacar
Enrollment and Student Recruitment Task Force Community Partnerships	Sheila Buyukacar Michael Nakata (Marketing) Randy Shiraishi
Academic Performance Committee Curriculum-Project Alignment Task Force	Deborah Bond-Upson, Melissa Hawkins Sheila Buyukacar
Board Development Committee Governance Committee Board Capacity Task Force	Randy Shiraishi, Jessica Wong-Sumida
Organizational Processes Task Force (Documentation/Forms)	Randy Shiraishi
Finance Committee	Thelma Alane, Michael Nakata, Andrew Hata

Source: Application – p 77

Essential Partners - extensive experience and expertise with Hawai'i charter schools

- Ho'okako'o Corporation - Charter organization, finance and governance
- Athlos Academies - Charter school leadership, board and teacher professional development
- Ms Donna Porter - Conscious Discipline and School Family Frameworks
- PLACES - Place and Project Based Learning

Implementation Plans - Year 0

- US DOE planning and implementation grant starting in Year 0 - \$750K (Attachment Y & Z)
- Identified and committed returning founding board (p 73-74 and table above)
- Identified and funded expertise (Attachment Y and table above)
- Identified Governance Roles and Responsibilities (Table, p71-73)
- Facility Acquisition Project Plan (Attachment U, p2-3)
- Marketing & Student Recruitment Plan and Timeline (Attachment U, p4-6)
- Community Partnership Development Plan and Timeline (Attachment U, p5)
- Personnel Recruitment, Hiring and PD Plan and Timeline (Attachment U, p6-8)
- Board Development and Transition Plan and Timeline (Attachment U, p8-11)
- Community Project and Curriculum Alignment and Timeline (Attachment U, p12-13)

Full or Near Full-Time Project Manager and Resourceful & Resilient School Director

Our project manager has over 20 years of US Air Force experience in implementing unique and new multi-base/country/location programs. As important, she has been a business owner and unconventional K-12 educator for the past 10 years with graduate degrees in Business and Education.

Supported and Supportive School-wide Practices

Academic model - school-wide

1. Safe and nurturing environment – social-emotional and communication development
 - a. School Family - routines, language, school and classroom structures, and rituals

2. Real world connections – engaged and deeper learning
 - a. Project-based learning
3. Academic rigor – content, performance and skills mastery
 - a. Grade level state and national content and performance standards

School-wide culture of leadership, mentorship, collaboration and IMAG decision making
(Learning Environment, Teaching Community, School Organization)

1. Weekly teacher meetings
2. Multi-age subject grouping
3. Community-Parent Wednesdays
4. Quarterly student-teacher feedback sessions

Academic tools to ensure culture and academic performance

1. Individualized goal and learning plans
2. Multi-Level System of Support
3. State and national content and performance standards
4. Teacher evaluation system
5. Assessment inventory and schedule

Comprehensive personnel and partnership functionality alignment

Academic Support Personnel

1. Director, Counselor(s), Academic coaches, Project & Student Services Coordinators
2. Athlos Academies assistance

Organizational and Financial tools

1. Policies, processes and procedures
2. Governance structure

Organizational and Financial Support Personnel/Partnership

1. Business manager, Registrars, SASA, Account Clerk
2. Ho'okako'o Corporation assistance

Teaching staff (1st year - 12 teachers & 3 educational assistants)

1 teacher per 25 students and 1 educational assistant per 3 teachers

Concern: Third Party Service Provider information was not provided, therefore introduced confusion and inability to evaluate our organizational and financial plans

Response: Criterion I.1.a Third Party Service Provider and it's description of a Service Provider Selection and Track Record (copied below), requested an explanation of why **a service provider would be used rather than operate the proposed school directly**. Our plan is to operate and manage IMAG Academy directly. We never considered a third-party service provider to operate our school directly as described by the criterion. Therefore, this section did not appear applicable based on what the criterion explicitly asked for.

II.1. Service Provider Selection and Track Record

a. A reasonable explanation of why the applicant is seeking to contract with a Service Provider rather than operate the proposed school(s) directly.

With Ho'okako'o represented at the interview, we were ready to present a more specific description of the functions that Ho'okako'o would be able to provide, as well as the related budget, this was

not allowed. More importantly, no requests from the evaluators were made within the request for clarification regarding these concerns, which would have allowed us to address misunderstandings that tainted 3 of 4 evaluated sections; Organizational Plan, Financial Management Plan and Evidence of Capacity.

We had identified both Ho'okako'o and Athlos Academies as essential partners to provide us with expertise and experience in specific functions. Like other essential partners identified (Ms Donna Porter and PLACES) we transparently highlighted within the application and interview that specific functions would have to be re-aligned and FTE funds re-directed to ensure the right combination of school and partner resources were optimal and affordable. This required more discussion between IMAG Academy and our essential partners and was identified to happen during the rest of the application phase and the months following our charter approval. Bottom line, it was made clear that specific tasks (not necessarily positions) would be realigned (vs eliminated) and would be funded via some of the FTE positions we identified within our budget.

Ho'okako'o's extensive experience strengthens our knowledge and skills in organizational and financial practices. Athlos Academies would provide knowledge and guidance in aligning project-based learning and academic performance.

Section III - Organization Plan

Concern: Facility plan shared doesn't align with school culture and School Family framework.
Concern: Facility plan shared include options for school to operate at multiple sites for different grade divisions, but doesn't clarify how culture would be preserved or any safety plan or measures to address travel between sites.

Response: IMAG Academy's culture of leadership, mentorship, collaboration and decision-making transcends the school through its mindset, strategies, policies, practices and processes. In fact, the School Family framework is grounded in a safe and nurturing environment with common and respectful language, school and classroom structures, routines, and rituals. It is not bounded by the location or the number of buildings the students/faculty frequent. It provides a sense of belonging and family no matter the distance.

Facility plan - Due to the many facility options within this and other possible areas in Waipahu the evaluator concerns may never materialize. Although we had not identified a specific facility, we provided the evaluators with a chosen location with a large amount of leasable space that would provide us with many options to accommodate our growth over the years. This facility option presented the possibility of a multi-building school which is a very common place among all schools; public and private. With the facility concerns and difficulties facing most charter schools, established and startup, we felt this type of flexibility to be a strength. In addition, in previous years, when we shared different possible locations across Waipahu, we were criticized for not knowing where we wanted to be located.

Safety plan - Although any travel across a commercial area by our students/staff may never happen, safety of school and community members will always be paramount and the appropriate actions, rules, and procedures will be developed and followed.

Presented within our application (p 81-82) was a summary of safeguarding and safekeeping across areas such as personnel, facilities, grounds, equipment and furniture, information technology. We also identified that we would develop specific standard operating procedures within each area once

our location was secured, which would include a travel and street crossing safety procedure.

Concern: MOU with Ho'okako'o as a resource/essential partner served as conflicting plan and inconsistencies in school operations and organizational structure which hindered evaluator's ability to properly evaluate viability of the organizational plan.

Concern: Conflicting plans for school operations – Key leadership and control functions assigned and budgeted for staff positions; Business Manager, Account Clerk, and Registrar. However, at interview stated Ho'okako'o would provide services.

Concern: Inconsistency regarding organizational structure. Financial contingency plan reduces funds for the Business Manager position. It is unclear how it affects the school's and Ho'okako'o's relationship and arrangements.

Response: To ensure our organizational functionality and budget was clearly understood we identified and represented it within our organizational plan and budget as full-time-equivalent (FTE) positions; ie Registrar, Business Manager, SASA, SSC, Account Clerk. This was discussed at our interview and stated within our application as a way to ensure we identified and funded these important and essential functions required to operate a school, regardless of who would perform the myriad of tasks.

We have identified Ho'okako'o as an essential partner to provide us with expertise and experience in specific functional tasks performed by some of these identified FTEs. At the time of the application deadline, a more targeted list of services required more discussion between IMAG Academy and Ho'okako'o, therefore these functions were represented with the appropriate HSTA and other union FTE budgeted positions and customized descriptions. Funding changes would be sourced according to the realigned tasks at a later date.

In preparation to better explain and illustrate the relationship between the budgeted FTE positions and Ho'okako'o's services at the interview, we had a list of tasks that Ho'okako'o was committed to possibly perform that was not accepted by the evaluators. It contained tasks to be re-aligned across school and our partner's resources where it was optimal both in control and functionality.

We believe, presenting an essential partner that would perform some of our tasks as a contractor within our organizational structure/chart is not conducive to our plan to directly operate and manage our school, therefore they were not considered a third-party service provider as described within Criterion II.1- copied below. More importantly, we do not consider them to be a part of our organizational structure/chart.

II.1. Service Provider Selection and Track Record

a. A reasonable explanation of why the applicant is seeking to contract with a Service Provider rather than operate the proposed school(s) directly.

In addition, our contingency plan (pg 93) identifies 3 specific actions regarding reducing the costs (not the essential tasks) of the Business Manager position/functionality. These are:

- a. Evaluate work required and redistribute transactional tasks to SASA
- b. Seek professional bookkeeping support service contract
- c. Use contracted service for more flexibility on cash flow

This is in fact is what we are now doing with the further development of our relationship with Ho'okako'o – re-aligning tasks to increase and strengthen our organizational and financial

management expertise, knowledge, skills in the performance of important processes and procedures, but not lose essential and operational control. The following is a list (not accepted at the interview) of major tasks/projects Ho'okako'o is prepared to assist with in Year 0 and beyond:

Financial

- Establish and set up bank accounts
- Select & set up financial software
- Establish org process chart and authorized signers for bank accounts, etc.
- Create & approve financial procedures & policies to ensure internal controls are in place
- Create chart of accounts and develop forms for reimbursements, credit cards, etc.
- Manage US DOE grant and manage accounting and financial services

Human Resources

- Develop policies (personnel, administrative, student, etc)
- Develop school-specific personnel forms/documents
- Provide/attend training (supervisory/performance management, Ceridian payroll)
- Setup payroll system and establish leave accounting system
- Finalize position descriptions and prepare for recruitment
- Establish employment paperwork processing protocols
- Manage personnel and payroll services

Governance

- Ensure the mission, strategic priorities, policies and viability of the school
- Adopt board by-laws
- Board composition (302D-12)
- Establish board oversight processes
 - Academic, Financial, Operational
 - School leader oversight and evaluation
- Establish board policies and procedures
 - Recruitment, Terms, Conflict of Interest, Board Skills
- Prepare/train board members in nonprofit governance
- Adopt board meeting calendar and procedures (i.e. public meeting requirement)

Concern: IMAG Foundation's governing board represents more than half of the foundation's voting members and generates concern pertaining to responsibilities and duties of the governing board and the responsibilities and duties of the non-profit. Consultation and guidance from the State Ethic Commission should be sought to address potential conflicts of interest.

Response: Forming the IMAG Foundation was a requirement of our US DOE CSP grant and current governing board members were selected to expedite the process. Should we be approved, it was always our intention to make the appropriate changes in directors and to ensure the proper and lawful management of the foundation and our grant. Ho'okako'o's experience in all aspects of financial and back-office tasks, to include federal grant management is a unique strength and provides us with the highest levels of competency and capacity even as a new startup charter school.

Section IV - Financial Plan

Concern: Specific internal controls and compliance with all financial reporting requirements are not assured. A clear, complete description of the roles and responsibilities of financial oversight and management, a complete plan for evaluating and monitoring financial performance or thoughtful, appropriate corrective actions, or sound criteria and procedures for selecting vendors or contractors for any administrative services are not provided.

Response: As we prepared our application this year, we diligently sought an essential partner with not only financial expertise, but experience within the Hawai'i public charter school system. We

have continued discussions with Ho’okako’o in the re-alignment of our operational and financial management functions across IMAG Academy. They are a tremendous resource that will guide and assist with the appropriate design and procedures of internal controls and compliance with all financial reporting requirements. This will ensure the appropriate financial oversight and management, evaluation and the monitoring of our financial performance along with following appropriate corrective actions, as well as identifying sound criteria and procedures for vendor and contractor selection.

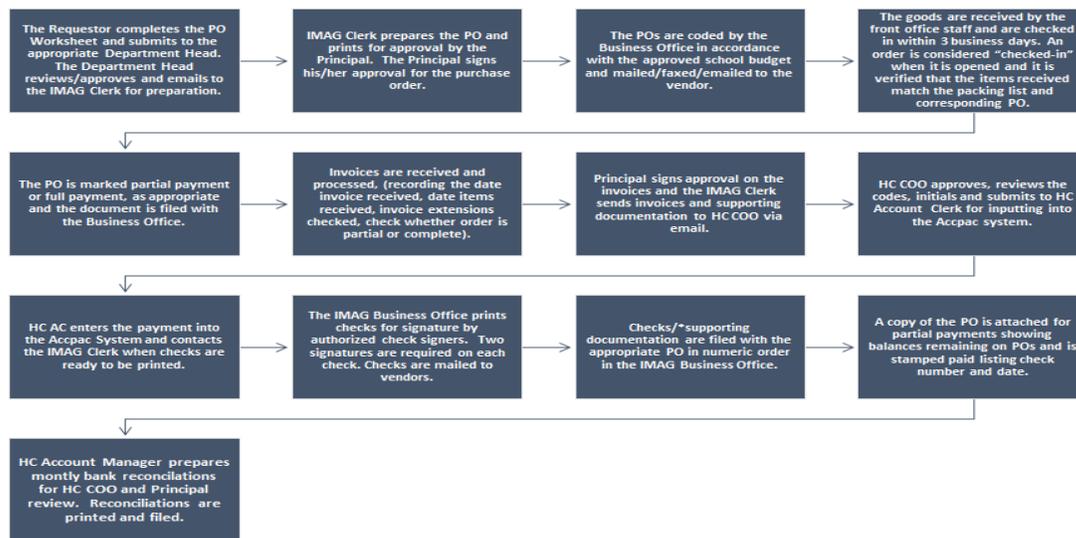
Internal controls

With the help of Ho’okako’o internal controls will be defined in the Financial Policies & Procedures (P&P) and will include the segregation of accounting functions to ensure that proper checks and balances are in place (see sample flow chart below). The P&P will include detailed procedures for Cash Receipts, Purchases/Disbursements, Procurement, Payroll Processing and Budget. An example of our P&P prepared by Ho’okako’o is provided below.

Financial reporting

The Ho’okako’o Account Manager (HC AM) will work with the Ho’okako’o Chief Operations Officer (HC COO) and the IMAG School Director to close the accounting records on a quarterly basis and prepare required financial reports. The financial reports will be submitted to the IMAG Board for review and analysis prior to the submission to the State Public Charter School Commission Staff.

IMAG Sample Purchase Order/Invoice Flow Chart



*Supporting documentation includes of a copy of the voucher check, original invoices (stamped with paid stamp listing check number and date), POs, PO worksheets and packing lists.

Concern: As startup year is solely dependent upon the federal grant, the school does not have sufficient funds to cover actual expenses prior to federal reimbursement in Year 0.

Response: With the help of Ho’okako’o’s familiarity with US DOE startup grants, we received clarification from our US DOE point of contact that advances or draws can be made in lieu of invoices and statement of services and purchase orders. This process allows for funds to be allocated prior to having to pay an expense, therefore IMAG Academy will be able to draw funds to make payments. In addition, a fundraising plan to commence upon charter approval was not shared due to having the US DOE grant approved in April of 2016.

Concern: *An MOU with Ho'okako'o was included in the application. At the capacity interview the type of services to be provided and the associated costs remain unknown, placing the school at risk for failure.*

Response: We have continued to delineate some of these tasks and this work was made available at the interview, but not accepted. A description is presented above. Once the specific tasks are finalized, our plan has always been to re-align a portion of the FTE tasks across a variety of positions and Ho'okako'o and have funds re-directed to ensure the right combination of school and partner resources are optimal. This decision will be based on the credentials of the available application pool for organizational and financial positions. (Section III – Organizational Plan p6-8).

We believe, having Ho'okako'o as an essential partner with extensive knowledge and performance success with three Hawaii public charter schools ensures our financial performance and capacity for success and ensures a **no-to-very low risk of failure**.

Concern: *The budget is incomplete, unrealistic, and not viable for a charter school start-up. The budget anticipates cash to trend downward from Year 0 to Year 3. By Year 3, the School's cash on hand will fall below the standard of 60 days for charter schools.*

Response: Upon review by Ho'okako'o finance personnel, the Annual Budget did not reflect the true position of IMAG Academy. Upon properly carrying over Net Assets (line item #40) to subsequent years, the projected cash-on-hand at Year 3 would be approximately \$970,074, meeting the 60 day standard.

Concern: *The Statement of Net Assets does not align with the Annual Budget. There is no carry-over funding from Year 0 to Year 3, yet the Statement of Net Assets shows balances of the federal award. These concerns may put the state at-risk for potential fiscal liability.*

Response: Upon review by Ho'okako'o finance personnel, the Statement of Net Assets was completed improperly. As presented below, the federal grant will be spent as follows:
\$192,617 in Year 0;
\$304,683 in Year 1 (includes \$7,678 carrying forward from Year 0);
\$252,173 in Year 2. The State Per Pupil funds will be the funds carrying over (\$970,074 at Year 3).

Section V - Evidence of Capacity - Academic Plan Capacity

Concern: *Proposed school director lacks track record of improving student outcomes or experience managing a project of this scope*

Concern: *Launch of a growth model for three school divisions simultaneously*

Response: Our school director has been working as an unconventional K-12 educator for over 10 years and continues to help students to improve their knowledge, skills and performance outcomes. She currently provides classes in applied business, arts, science and engineering at the IMAG Academy LAB in Waipahu.

Project Scope - In addition to opening up her own businesses (IMAG Academy LAB, Focused Reality, Organizational Logic) our proposed school director is a retired US Air Force officer with over 20 years of service in transforming ideas into unique multi-base/country/location projects and programs. Throughout her career, she was sought after to lead the design, development, implementation and operational management of new and constantly evolving projects (Attachment BB). She would be bringing her extensive project management experience and entrepreneurial spirit to transforming IMAG Academy into a thriving and successful school accessible to 750 students within the central leeward area.

Launch growth model for three school levels simultaneously - These concerns were responded to within Section II – Academic Plan (p2-5) of this document. As iterated before, the combined capacity of our founding board and the extensive successful documented performance of our essential partners provide us a unique and strong Academic, Organizational, Financial Management Capacity which far exceeds most new start up charter schools. Along with our IMAG Academy’s design and foundational elements (outlined below) put in place during Year 0, there are several factors that ensure our ability to succeed.

Presented in detail in Section II – Academic Plan (p2-5) is our response and outlined below are IMAG Academy’s foundational elements that will enable and enhance our capacity to successfully launch our growth model across multi-school levels. These are identified as

- Defined academic model and shared pedagogy across all divisions with attention to individual needs of each grade level
- Varied expertise and experience of our governing board
- Time commitments of our governing board members and funded positions
- Use of our committee and task force structure
- Essential partners with extensive success with charter school operations and finances
- Extensive Implementation Plans and Timelines
- Full or Near Full-time Project Manager and Resourceful & Resilient School Director
- Supported and Supportive School-wide Practices
- Comprehensive personnel and partnership functionality alignment

Organizational Plan Capacity

Concern: *Inconsistencies on how Ho’okako’o Corporation will be used*

Concern: *Facility plans and school culture is incongruent*

Concern: *Potential conflict between IMAG Academy school board and non-profit board*

Response: These concerns were responded to within Section III – Organizational Plan (p8) of this document. As iterated before, the combined capacity of our founding board and the extensive successful documented performance of Ho’okako’o, provides us a unique and strong Organizational Capacity which far exceeds most new start up charter schools.

Financial Management Capacity

Concern: *Financial plan did not meet standards to demonstrate financial management capacity, including technical capacity to administer a cost-reimbursement grant.*

Response: **Financial management capacity** - These concerns were responded to within Section IV – Financial Plan (p12) of this document. As iterated before, the combined capacity of our founding board and the extensively successful documented performance of Ho’okako’o, provides us a unique and strong Financial Mgt Capacity which far exceeds most new start up charter schools.

Administer cost-reimbursement grant – Our partnership with Ho’okako’o provides us with the experience and technical capacity to administer our US DOE CSP grant of \$750,000 over 3 years. Ho’okako’o has not only received and administered this type of grant for several other charter schools, but they continue to acquire and manage federal, state and foundation level grants.

Concern: *Conflict between fiscal services provided by Ho’okako’o and positioned employees*

Response: These concerns were responded to within Section III – Organizational Plan and Section IV – Financial Plan (p13) of this document. As iterated before, the combined capacity of our founding board and extensively successful performance of Ho’okako’o, provides us a unique and strong Financial Management Capacity which far exceeds most new start up charter schools.

Annual Budget - Ho'okako'o Revised				
For Fiscal Year July 1, 20__ through June 30, 20__				
	Year 0 (Start Up)	Year 1	Year 2	Year 3
OPERATING REVENUES				
1 Grants - State Per Pupil		1,462,500.00	2,275,000.00	2,925,000.00
2 Grants - State Facilities				
3 Grants - State Other				
4 Grants - Federal	192,617.00	304,683.00	252,173.00	
5 Grants - Private				
6 Nutrition Funding - Federal				
7 Nutrition Funding - Fees				
8 Other Program Fees				
9 Contributions, cash				
10 Transportation Fees				
11 SPED Reimbursements				
12 Other:				
13 Other:				
14 TOTAL OPERATING REVENUES				
OPERATING EXPENSES				
15 Administration	68,283.00	224,240.50		
16 Instructional Services	87,600.00	900,524.50		
17 Pupil Services	-	38,762.50		
18 Operation & Maintenance of Plant	36,734.00	268,964.00		
19 Benefits and Other Fixed Charges	-	-		
20 Community Services	-	-		
23 TOTAL OPERATING EXPENSES				
24 TOTAL OPERATING GAIN/(LOSS)				
NONOPERATING REVENUE				
25 Grants - Private				
26 Contributions, in-kind				
27 Contributions, from Component Unit				
28 Contributions, Cash	5,000.00	5,000.00		
29 Rental Income				
30 Interest/Investment Income				
31 Other:				
32 Other:				
33 TOTAL NONOPERATING REVENUE				
NONOPERATING EXPENSES				
34 Long-Term Interest	-	-		
35 Other:				
36 TOTAL NONOPERATING EXPENSES				
37 TOTAL NONOPERATING GAIN/(LOSS)				
CHANGES IN NET ASSETS:				
38 Other:				
39 NET ASSETS AT BEGINNING OF YEAR	-	5,000.00	344,691.50	760,244.00
40 NET ASSETS AT END OF YEAR				

Statement of Net Assets (Balance Sheet) - Ho'okako'o Revised				
As of June 30, 20xx				
	Year 0	Year 1	Year 2	Year 3
ASSETS				
Current Assets				
1 Cash and Cash Equivalents	5,000	344,692	760,244	970,074
2 Accounts Receivable net of doubtful accounts				
3 Grants Receivable - State	-	-	-	-
4 Grants Receivable - Federal			-	-
5 Grants Receivable - Private				
6 Contributions Receivable	-	-	-	-
7 Due from related parties				
8 Prepaid Expenses				
9 Short-Term Investments				
10 Other:				
11 Other:				
12 TOTAL CURRENT ASSETS	5,000	344,692	760,244	970,074
Noncurrent Assets				
<i>Capital Assets</i>				
13 - Land and Buildings				
14 - Building/Leasehold Improvement	-	-	-	-
15 - Furniture and Equipment	10,000	15,000	20,000	25,000
16 - Less Accumulated Depreciation		(3,500)	(5,000)	(7,500)
17 Net Capital Assets	10,000	11,500	15,000	17,500
18 Restricted cash and cash equivalents				
19 Long-Term Investments				
20 Other:				
21 Other:				
22 TOTAL NONCURRENT ASSETS	10,000	11,500	15,000	17,500
23 TOTAL ASSETS	15,000	356,192	775,244	987,574
LIABILITIES AND NET ASSETS				
Current Liabilities				
24 Accounts Payable				
25 Accrued Expenses				
26 Deferred Revenue				
27 Due to related parties				
28 Current Debt Payable				
29 Current Lease Obligations Payable				
30 Other:				
31 Other:				
32 TOTAL CURRENT LIABILITIES	-	-	-	-
Noncurrent Liabilities				
33 Noncurrent Lease Obligations	-			
34 Long-Term Debt	-			
35 Other:				
36 Other:				
37 TOTAL NONCURRENT LIABILITIES	-	-	-	-
38 TOTAL LIABILITIES	-	-	-	-
NET ASSETS				
39 Investment in capital assets (net of related debt)	10,000	11,500	15,000	17,500
<i>Restricted:</i>				
40 -Temporarily:				
41 -Permanently:				
42 Unrestricted: Line-8/14/15	5,000	344,692	760,244	970,074
43 TOTAL NET ASSETS	15,000	356,192	775,244	987,574
44 TOTAL LIABILITIES AND NET ASSETS	15,000	356,192	775,244	987,574

Appendix A – Responses to Specific Concerns

The following responses are of concerns within Appendix A of the Evaluator’s Recommendation Report.

III.A.1- Concern: Unclear what is meant by “while being responsive to the School Director” and the impacts this will have on responsibilities of the governing board.

III.A.2 - Concern: Does not provide enough to describe the board’s working relationship with the school.

Response: A detailed table (p71-73) in Criterion III.A.4 includes responsibilities and actions of the governing board and school director. Some of the actions highlighted here can be found within this table, as it describes a responsive and working relationship with the school board and director.

Ensures Effective Governance and Accountability -

- Performs monthly reviews
- Supports/guides School Director through collaboration and on-going feedback and an annual evaluation
- Requires monthly director reports and attendance at board meetings

Ensures Effective Organizational Planning

- Provides guidance to both our board and school director

Ensure legal and ethical integrity and maintain accountability.

- Establish policies to guide the school's board members and staff
- Develop and maintain adequate personnel policies and procedures

Ensures Effective Organizational Planning

- Uses applicable measurements/metrics and reviews of the resulting data to inform decision making
- Provides guidance to both our board and school director

Manages and Ensures Adequate Resources

- Review budget implementation through monthly financial reports
- Approve all major contractual obligations of the school.
- Approve accounting policies

Ensures Alignment with School Purpose

- Consciously keeps aligned with vision, mission and values with an focus on successful student performance

Determine, monitor and strengthen the programs and services

- Adopt academic and facilities planning documents for the school
- Approve new academic and other programs and major organizational changes
- Review the degree to which programs and services are consistent with the mission and the charter
- Approve measurable organizational outcomes

Evaluate the School Director

- Provide frequent and constructive feedback
- Provide an annual written performance review with a process agreed upon with the school director
- School Director keeps board informed thru on-going verbal communications and written reports

III.A.3 and III.F.1 and III.F.2 - Concern: Inconsistencies with key positions and the use of Ho’okako’o to perform tasks

III.A.4 - Concern: Unclear how IMAG Academy will interact with essential partners.

Response: Answer provided in Section II – Academic Plan (p5).

III.A.8 - Concern: Reference to experienced local and mainland service providers – but no Third

Party Service provider in in Section II.

Response: Answer provided in Section II – Academic Plan (p5).

III.A.9 and III.A.12 - Concern: Governing Board members conflict with IMAG Foundation Board members

Response: Answer provided in Section III – Organizational Plan (p8).

III.A.11 - Concern: No description of the ways how the non-profit will specifically support the school

Response: We stated within the application on p 78...

“IMAG Foundation ... will support the school in funds development, fundraising, fiscal sponsorship/agency and strategic visioning assistance”

III.A.13 - Concern: School needs a plan to ensure student records are transferred appropriately

Response: While not providing a finalized Charter School Closure Protocol, our application response demonstrated an understanding of the Criterion by anticipating and formally creating and authorizing this and other policies and procedures following the approval of the charter application as part of Year 0 activities and deliverables. As mentioned is our unique appreciation by one of our member’s that has already been through this process and would ensure an orderly closure that is the least disruptive to the students and families (p79).

III.B.1 - Concern: Some indicators have a position assigned - others do not.

Concern: Position that will compile and interpret data for the governing board - not answered

Response: All metric indicators and more had positions identified per a table (p79-80). Although the table column only indicates the position responsible for collecting, our narrative identifies these positions that would also compile the information. Interpretation would be provided by the appropriate position/person identified within this table along with our Academic Coaches, School Director, Board President, and committee members.

	Performance Indicators	Target	Responsible for Collecting
1	Strive Hi Performance Index	Index of our students’ test scores, growth, readiness and achievement gap	SASA
2	Enrollment & Projects	Number of students enrolled vs projected	SASA
3	Board Performance	Annual self-assessment of practices of a well-governed board	Board President
4	Staff Turnover	Number/percentage of workers who leave and replaced	SASA
5	College-Career-Business	Survey of what a student actually does after graduation	SASA
6	Graduation Rate	Percentage of students graduating	SASA
7	IMAG Practices – Decision-Making Process	Number/percentage of students using the IMAG Decision-Making process during project	Academic Coach
8	IMAG Practices-Solutions	Number/percentage of students choosing an IMAG driven solution	Academic Coach
9	School Family – BASC 2	number of students with a higher than normal risk level for negative social-emotional behaviors	Academic Coach
10	Compliance reporting	Number of reports/items meeting reporting requirements	SASA
11	Attendance	Number (and who) was absent	SASA
12	Referral-Suspension	Number of referrals and number of suspensions	Counselor
13	Family/Student Event	Number of family/student interactive events or activities	Student Services and Project Coordinator
	Family communications	Number of communications attempts (multiple mediums)	Student-Parent Coordinator

Source: Application p79-80

III.B.2 - Concern: IMAG’s response in this section is sparse and does not provide a clear description of the specific corrective actions the board will take to address issues.

Response: In addition, during our startup year, we will also be finalizing board governance,

operational and personnel management, and other pertinent policies and their associated processes and procedures. With the use of these structures and the resulting information, board members and school director, in consultation with Ho'okako'o Corporation, will revisit appropriate benchmarks and milestones on a regular basis to ensure our planned progress and school performance success. Preventive and appropriate steps will be confirmed to ensure assessment, evaluation and corrective action are an essential part of our policies and ingrained in our on-going practices.

III.C.1 - Concern: IMAG did not provide the rationale for not providing daily transportation services.

Response: We did provide a rationale and another solution to a possible transportation concern within our application (p81).

“Based on our current projected location options, IMAG Academy will be easily accessible to the surrounding neighborhoods, therefore, at this time, we are not planning on providing daily transportation to and from school. Depending on our enrolled student’s family needs, if necessary, IMAG Academy will plan to open our doors early to accommodate those families needing to drop children off early, eliminating a family’s need to find alternative transportation to accommodate our late start time.”

III.C.2 - Concern: Safety and security of students due to multi-site facility plan and crossing busy street

Response: Answer provided in Section III – Organizational Plan (p6).

III.C.3 - Concern: While the applicant provides several food service options, it is unclear what option is preferred and will be focused on. In addition, the school financial plan does not include food service costs.

Response: We provided our choices in priority order, identified as Option 1 - 3. In addition, within our application narrative we stated we would be working with the Hawaii Child Nutrition Program to take advantage of the program. As important, we also provided an extensive analysis of the free and reduced lunch program reimbursement and costs that the IMAG Academy could incur within our Request for Clarification Response - copied below.

Assumptions

- a. Cost of Lunch = \$5/person
- b. # of Students in program = 62.4%
- c. “Reduced” Reimbursement for school with >60% eligible (applied to all eligible students) = \$3.31*
- d. “Non-eligible” Reimbursement for school with >60% eligible (applied to non-eligible students) = \$0.37*

Description	Year 1	Year 2	Year 3
Lunch Price - All Students Line #350	\$203,625.00	\$316,750.00	\$407,250.00
USDA Reimbursement-Reduced > 60% eligible	\$86,575.14	\$134,672.44	\$173,150.28
USDA Reimbursement NOT in Program > 60% eligible	\$5,390.67	\$8,385.48	\$10,781.33
USDA Total Reimbursement Line #6	\$91,965.81	\$143,057.92	\$183,931.61
Parent Payment-NOT in Program Line #7	\$67,456.18	\$104,931.83	\$134,912.35
Total Reimbursement	\$159,421.98	\$247,989.75	\$318,843.97
Cost of Program	\$44,203.02	\$68,760.25	\$88,406.03
Change to Net Assets	\$287,810.48	\$346,792.25	\$121,423.47
Projected # in Program (62.4%)	145	225	289
Projected # NOT in Program	80	125	161
Total # of Students	225	350	450

Realities

- a. Specific eligibility will be driven by enrollment , therefore we used the REDUCED (\$3.31) vs a FREE (\$3.71) reimbursement to apply to all eligible students.
Reimbursement (Line #6) should be higher.
- b. Some students will bring their own lunch - Not all students will buy their lunch through the school – Lunch Price (Line #350) should be lower
Parent Payment Reimbursement (Line #7) should be lower
- c. Parent Lunch payments may be paid directly to the lunch vendor
Lunch Price (Line #350) will be lower
Parent Payment Reimbursement (Line #7) would be eliminated

III.E.2 - Concern: Multi-site facility conflicts with School Family culture and need for additional buildings

Response: Answer provided in Section II – Academic Plan (p2-5).