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STATE PUBLIC CHARTER SCHOOL COMMISSION
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RECOMMENDATION SUBMITTAL

DATE: July 23, 2015

TO: Mitch D'Olier, Chairperson Applications Committee

FROM: Tom Hutton, Executive Director

AGENDA ITEM: Action on Charter School Application for Kamalani Academy

I. DESCRIPTION

Recommendation that the Committee recommend to the full Commission that it deny the 2014 charter school application of Kamalani 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

Proposed School Name: Kamalani Academy

Mission: "The mission of Kamalani Academy is to provide an education that nurtures the whole child, celebrates the uniqueness of each child, and provides an innovative arts integrated education to increase academic achievement. Arts integration actively engages and challenges students in meaningful curriculum that will increase their literacy skills and overall academic achievement. The positive learning environment embraces cultural diversity and nurtures the child's self-esteem and love of learning. The Kamalani Academy strives to actively involve families and the community in our learning process."

Vision: "The vision of Kamalani Academy is to develop life-long learners with leadership skills acquired from the arts integration approach to learning. Students at Kamalani will be thoughtful

communicators, critical and analytical learners, confident decision makers, resilient problem solvers, collaborative workers, and imaginative and creative thinkers, who positively advocate for themselves and others. Students will develop the skills and understandings essential for college, career, and life readiness. Kamalani students will thrive as contributing members of our local and global community."

Geographical Area: Kamalani Academy proposes to be located in East Oahu. While the applicant has not secured a site, it is looking at two possibilities, one in Hawaii Kai, which is currently occupied by the Japan-America Institute of Management, and another at the Halekauwila Plaza in Kakaako that Voyager: A Public Charter School previously occupied.

Program Synopsis: The Kamalani Academy proposes to use an arts integration approach to instructional strategies and utilize the behavioral philosophy of Positive Behavioral Support to nurture the social and emotional growth of each child. Arts integration instructional strategies, best practices, and positive behavioral support will nourish the vision of the school to "be thoughtful communicators, critical and analytical learners, confident decision makers, resilient problem solvers, collaborative workers, and imaginative and creative thinkers, who positively advocate for themselves and others." The philosophy of assessment and examination of data is that the results from the assessment instruments will be used to identify improvement needs and demonstrate benchmark mastery.

Enrollment Summary

Grade Level	Number of Students											
	Year 1 2016		Year 2 2017		Year 3 2018		Year 4 2019		Year 5 2020		Capacity 2021	
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	50		50		50		50		50		50	
1	50		50		50		50		50		50	
2	50		50		50		50		50		50	
3	50		50		50		50		50		50	
4	50		50		50		50		50		50	
5	50		50		50		50		50		50	
6	50		50		50		50		50		50	
7			50		50		50		50		50	
8					50		50		50		50	
9												
10												
11												
12												
Subtotals	350	0	400	0	450	0	450	0	450	0	450	0
Totals	350		400		450		450		450		450	

IV. BACKGROUND

At its January 15, 2015 general business meeting, the Commission decided to recommend to Kamalani Academy to proceed to submit a Final Application but noted that Kamalani Academy's

Initial Proposal was "Substantially Inadequate" in the area of School Calendar, Schedule, and Staff Structure and that there were concerns in other areas, as detailed in the Initial Proposal Recommendation Report. On March 6, 2015, Kamalani Academy submitted a Final Application, which includes an Initial Proposal Amendment. The Evaluation Team assigned to the Kamalani Academy application was comprised of Danny Vasconcellos, Beth Bulgeron, Jeff Poentis, Kirsten Rogers, Kenneth Surratt, and Dr. GG Weisenfeld. In conjunction with the application, the Evaluation Team interviewed applicant group members and reviewed the applicant's responses to the Request for Clarification. The applicant group members that attended the interview were Kuuipo Laumatia, Dr. Pat Macy, Dr. Steve Davidson, Evan Anderson, and Ryan Reeves.

After evaluating the information presented in the application, capacity interview, and Request for Clarification response, the Evaluation Team published its Final Application Recommendation Report. The applicant exercised its option to write a response to the recommendation report, and the Evaluation Team wrote a rebuttal to that response. The Final Application Recommendation Report (**Exhibit A**), Applicant Response (**Exhibit B**), and Evaluation Team Rebuttal (**Exhibit C**) make up the Recommendation Packet.

In addition, the Commission held a public hearing on the application on June 18, 2015. Written testimony in support of Kamalani Academy was submitted by Waikiki Hawaiian Civic Club and two concerned individuals.

Further, staff solicited comments from the Department of Education ("DOE")—particularly the Farrington-Kaiser-Kalani, Kaimuki-McKinley-Roosevelt, Castle-Kahuku, and Kailua-Kalaheo Complex Area Superintendents—on the application. Of these Complex Area Superintendents, only Castle-Kahuku Complex Area Superintendent Lea Albert provided comments. Ms. Albert articulated several concerns with the proposal for Kamalani Academy, including concerns that Kamalani Academy would duplicate several programs already offered at various DOE schools in her Complex Area. Ms. Albert's comments are attached as **Exhibit D**.

Final Application Recommendation Report.

The Evaluation Team recommends that the application for Kamalani Academy be denied. The Final Application Recommendation Report states that the organizational plan, financial plan, and evidence of capacity do not meet the standard of approval and the academic plan falls far below the standard for approval.

The report finds that the application does not present a clear and coherent educational plan. Key concerns about the academic plan include:

- The lack of a clear and comprehensive curriculum development plan;
- The failure to explain how the arts would be integrated into the academic framework of the school despite a focus on arts integration; and
- The lack of a clear and comprehensive plan for assessing student progress and performance.

The report also finds that the applicant's organizational plan does not meet standards due to a start-up plan that is inadequate and fails to specify tasks, timelines, and responsible individuals and that the applicant's understanding of the amount of time, effort, and resources that are required to open a new charter school are not fully understood. Additionally, the report questions the lateral relationship between the school principal and the educational management organization ("EMO"), Academica Nevada, LLC ("Academica"), and the EMO's involvement assisting the applicant in selecting the principal.

The report notes that the financial plan does not meet the standard due to the lack of complete, realistic, and viable start-up and three-year operating budgets as well as the absence of a sound contingency plan, noting that the applicant's budget is so conservative that even a three percent drop in the targeted enrollment would have significant impact on the budget.

Based on the assessment of all of the pieces of the application, the report concludes that the applicant has failed to demonstrate that it can successfully implement the academic, organizational, and financial plans.

Applicant Response.

The Applicant Response to the Final Application Recommendation Report disputes the findings and conclusions by the Evaluation Team.

In regard to the academic plan concerns, the response:

- Notes that the Initial Proposal Recommendation Report states that the applicant's proposal meets the minimum requirements, yet in the final evaluation, the Evaluation Team concluded that the academic plan "falls far below the standard";
- States that the prospective hire of professional faculty members who are to implement the proposed curriculum will pull together the arts integrated curriculum, along with the replication the highly successful curriculum model of Doral Academy Inc.;
- States that through the applicant's association with Doral Academy Inc., as a Doral Academy school, it will receive upon its opening accreditation from AdvancED; and
- States that the applicant has articulated a clear and comprehensive plan for assessing student progress and performance, noting its proposed use of its internally reliable standardized assessment (STAR or AIMSweb), as well as other criteria and rubrics from the ARTS First Essential Toolkit, and collaborative development by its teachers.

In regard to the organizational plan concerns, the response:

- Disputes that the governance structure between applicant and its EMO is problematic;
- Notes that the governance structure, as proposed, replicates the structure at other successful schools in other states;
- Argues that the application process did not allow for a detailed presentation of the proposed organizational capacity and strength;
- States that the strong resumes and experience of the applicant's team, coupled with Academica and the academic expertise and support of Doral Academy, ensures that the applicant can successfully complete the start-up process;

- Challenges the Evaluation Team's assertion that the applicant will have only one full-time employee to work on the start-up in that Academica pledged to hire two full-time employees for start-up; and
- Disputes that the lateral relationship of the Principal to the EMO is problematic, but rather is a positive feature that many schools utilize in successful ways, with the Principal and EMO reporting directly to the governing board to make the final hiring decisions.

In regard to the financial plan concerns, the response:

- Disputes that the applicant's conservative financial plan is an indication of its lack of preparation;
- States that the applicant's conservative start up model is widely used across the country by its EMO;
- States that Academica will be providing much of the services during the start-up phase without charge to the governing board; and
- Argues that the application process and instructions do not ask applicants for a contingency plan that would include an assumption of a shortage of revenue in the amount of 10-15%; notwithstanding, given the qualifications and experience of the applicant team and its EMO, Academica, the applicant is confident that it would successfully rise to the challenge.

In regard to the capacity concerns, the response challenges the Evaluation Team's assertion that the applicant lacks capacity to implement the proposed plan given the depth of experience and resumes of the applicant team, governing board, advisory board, strategic partners, community supporters, Academica, and Doral Academy.

Evaluation Team Rebuttal.

The Evaluation Team Rebuttal attempts to address points raised in the Applicant Response.

In regard to the applicant's response to the academic plan concerns, the rebuttal:

- Notes that while the applicant met the lower threshold in the Initial Proposal criteria because it provided a skeleton curriculum development plan, when the final plan was submitted, the applicant failed to further describe or provide additional detail as to the curriculum development plan, and as such fell below the standard of review;
- Notes that the applicant's response includes new information, which the Evaluation Team has not had the opportunity to holistically evaluate, regarding Doral Academy;
- Rejects the applicant's assertion that Doral Academy curriculum will be successful at Kamalani Academy simply because it has produced results in other states, as the application failed to explain how the Doral Academy curriculum would be integrated and adapted to Kamalani Academy's curriculum; and
- Reiterates the concern regarding the lack of a clear plan to assess student progress, even after the applicant cites to the chosen assessments, because the applicant, again, is unable to explain why the specific assessments were chosen and how it will help to determine that its yet-to-be-developed arts integrated curriculum is successful.

In regard to the applicant's response to the organizational and financial plan concerns, the rebuttal notes the inconsistency of the applicant's assertion that the applicant has the capacity to implement given the one full-time employee to be hired by Kamalani Academy, but that Academica would hire

two full-time employees, assist with the hiring of the Principal, provide all of the start-up costs and supports, yet maintains that Academica is strictly the service provider and not a member of the applicant team, all the while laterally influencing the governance of the school.

In regard to the applicant's response to the capacity concerns, the rebuttal clarifies that the Evaluation Team's analysis was not a critique of the applicant teams' extensive qualifications but rather on how the applicant team used that collective knowledge and experience to prepare the charter application.

DECISION MAKING STATEMENT

Introduction.

Scope of Commissioner Review.

Applicants were advised at the beginning of the application process that the Final Application should be a complete and accurate depiction of their proposed plans. Applicants had the opportunity to amend their Initial Proposals and provide additional information through the Request for Clarification responses. However, applicants may not provide any new information beyond the information provided to the Evaluation Team in the Final Application, capacity interview, or responses to the Request for Clarification, because such new information would not have been holistically evaluated by the Evaluation Team. Further, the Request for Proposals states that the Commission shall not consider new information that was not available to the Evaluation Team. As such, Commissioners should not consider new information that was not part of the components of the application in their review and decision-making. New information is specifically flagged in the Evaluation Team Rebuttal and, where relevant, is noted in this submittal.

Staff Recommendation Focuses on Key Points.

While the Final Application Recommendation Report, Applicant Response, and Evaluation Team Rebuttal cover a variety of issues, staff 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 staff 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 staff reaches a conclusion for the Committee's and Commission'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 application does not present an adequate curriculum development plan.

The applicant's academic plan is unclear as initially it stated that its curriculum would be developed in-house and integrated with the arts by its own faculty. However, the applicant later references and relies on Doral Academy's curriculum model, which it neither provides nor describes adequately, and as such, could not be reviewed by the Evaluation Team.

There is a lack of understanding about the scope and magnitude of the effort that is needed to develop curriculum for a new school and to successfully integrate arts into that curriculum.

Curriculum is a written plan that includes the goals for student's development and learning, outlines the experience through which they will achieve those goals, what teachers will do to help students

achieve these goals, and the materials needed to support the implementation of the curriculum. It is everything that happens in the classroom to support students' learning. In the case of Kamalani Academy, its arts integrated curriculum should also meet the needs of the students that this school is seeking to serve. While the applicant has articulated key pieces and partners who will bring their products to the table, the applicant has neither developed nor articulated a sufficient plan, realistic timeframe, and budget to ensure that its faculty will have the time to develop, understand, and implement this curriculum.

While the applicant team has diverse experience and qualifications, it has not articulated an organizational and financial plan that demonstrates that the applicant team knows how to implement and operate the proposed school successfully.

Despite stating adamantly that Academica will serve as an EMO, the applicant essentially assigns nearly every activity required for start-up to Academica. Likewise on the academic end, Doral Academy is relied on to provide the vast extent of the curriculum to be adapted and developed. While the applicant cites to the successes of both organizations, it remains unclear as to how or whether the applicant has the capacity to manage, govern, and run the school given the heavy reliance on its service providers. This point is even more pronounced with the proposed lateral relationship between the Principal, for which Academica is assisting with the hiring, and the EMO. The financial plan mimics this dependency. The conservative $25,000 start-up budget donated by Academica, the two full-time employees of Academica dedicated to the start-up of the proposed school, and any other start-up costs are all covered by Academica at no cost to the school. However, nowhere has the applicant or Academica articulated the staffing plan and budget that will be necessary to successfully implement the yet-to-be-developed arts integrated curriculum.

While applicants are not discouraged to engage in beneficial partnerships with service providers, the applicant team and its governing board have not demonstrated a capacity to manage such a relationship.

Conclusion.

Staff agrees with the Evaluation Team that the applicant fails to present a clear and coherent educational plan and that the applicant lacks the capacity to successfully implement a charter school. The applicant's lack of understanding regarding the adaptation and integration of an arts integrated curriculum, and the over-reliance upon both its EMO to address the organizational and financial components of the plan and Doral Academy for the academic plan, demonstrates the capacity concerns that have been raised about the applicant team and its governing board.

Staff recommends the denial of Kamalani Academy's application.

V. RECOMMENDATION

Motion to the Commission:

"Moved to recommend to the Commission to deny the 2014 charter school application for Kamalani Academy."

Exhibit A

Final Application Recommendation Report for Kamalani Academy

State Public Charter School Commission

2014 Final Application Recommendation Report

Charter Application for
Kamalani Academy

Evaluation Team
Team Lead: Danny Vasconcellos
Evaluators: Beth Bulgeron
Jeff Poentis
Kirsten Rogers
Kenneth Surratt
GG Weisenfeld

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 2014 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.

Final Application Evaluation Process

The Commission examined feedback from its 2013 Application Cycle and researched the application processes from several states to develop a new, multiphase charter school application 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 Final Application phase of the application evaluation process are as follows:

Final Application Evaluation. The Evaluation Team conducted individual and group assessments of completed Final Applications (including Initial Proposals and Initial Proposal Amendments). 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 or virtual 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. The Commission's Operations Section produced informational reports on Charter Management Organizations and Educational Management Organizations associated with applicants for the Evaluation Team to consider.

Consensus Judgment. The evaluation teams 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 Final Application.

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

Evaluation
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

The rating given to each primary area is based on a holistic evaluation of the Final Application Evaluation Criteria and its impact on the overall plan.

Rating Characteristics

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

Proposal Overview

Proposed School Name
Kamalani Academy

Mission and Vision

Mission: "The mission of Kamalani Academy is to provide an education that nurtures the whole child, celebrates the uniqueness of each child, and provides an innovative arts integrated education to increase academic achievement. Arts integration actively engages and challenges students in meaningful curriculum that will increase their literacy skills and overall academic achievement. The positive learning environment embraces cultural diversity and nurtures the child's self-esteem and love of learning. The Kamalani Academy strives to actively involve families and the community in our learning process."

Vision: "The vision of Kamalani Academy is to develop life-long learners with leadership skills acquired from the arts integration approach to learning. Students at Kamalani will be thoughtful communicators, critical and analytical learners, confident decision makers, resilient problem solvers, collaborative workers, and imaginative and creative thinkers, who positively advocate for themselves and others. Students will develop the skills and understandings essential for college, career, and life readiness. Kamalani students will thrive as contributing members of our local and global community."

Geographic Location
Kamalani Academy proposes to be located in East Oahu. While the applicant has not secured a site, it is looking at two possibilities, one in Hawaii Kai, which is currently occupied by the Japan-America Institute of Management, and another at the Halekauwila Plaza in Kakaako that Voyager: A Public Charter School previously occupied.

Anticipated Student Population
Kamalani Academy proposes to be open to all Oahu students but will target those living in East Oahu, specifically those in the Honolulu and Windward Districts (comprised of the Kaimuki, McKinley, Roosevelt, Farrington, Kaiser, Kalani, Kailua, Kalaheo, and Castle Complex Areas). The applicant "expects to have a racial/ethnic student population of English Language Learners (ELL), Students with Disabilities, and economically disadvantaged equivalent to that of the surrounding public schools."

Contribution to Public Education System
Kamalani Academy proposes to be a place for "future educators, visiting artists, [and] current educators to practice, teach, and learn." The applicant states a possible partnership with the University of Hawaii College of Education could "prepare teachers of music, dance, and drama" through mentorships with "Kamalani teacher leaders," and the university could use Kamalani Academy for "potential research for its doctoral and graduate students who want to research the arts and education." The applicant also states that it contacted a couple of Educational Specialists in the Department of Education that would "like to look at opportunities to work together to further advance arts integration in the public school system."

Enrollment Summary

Grade Level	Number of Students											
	Year 1 2016		Year 2 2017		Year 3 2018		Year 4 2019		Year 5 2020		Capacity 2021	
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	50		50		50		50		50		50	
1	50		50		50		50		50		50	
2	50		50		50		50		50		50	
3	50		50		50		50		50		50	
4	50		50		50		50		50		50	
5	50		50		50		50		50		50	
6	50		50		50		50		50		50	
7			50		50		50		50		50	
8					50		50		50		50	
9												
10												
11												
12												
Subtotals	350	0	400	0	450	0	450	0	450	0	450	0
Totals	350		400		450		450		450		450	

Executive Summary

Kamalani Academy

Recommendation

Deny

Summary Analysis

The Evaluation Team recommends that the application for Kamalani Academy be denied. The applicant did not meet the standards in any of the four areas, and the Academic Plan falls far below the standard.

The Academic Plan falls far below standards because it does not provide a clear and comprehensive curriculum development plan, fails to explain how the arts would be integrated into the academic framework of the school despite a focus on arts integration, and does not provide a clear and comprehensive plan for assessing student progress and performance.

The Organizational Plan does not meet the standard because the start-up plan is inadequate and fails to specify tasks, timelines, and responsible individuals and raises questions as to the applicant's understanding of the amount of time, effort, and resources that are required to open a new charter school. Also, a lateral relationship between the school principal and the educational management organization ("EMO"), Academica Nevada, LLC ("Academica"), is unclear as the EMO is currently assisting the applicant in selecting the principal.

The Financial Plan does not meet the standard due to the lack of complete, realistic, and viable start-up and three-year operating budgets and the absence of a contingency plan—even a three percent drop in the targeted enrollment would have significant impact on the budget.

Lastly, the applicant group has failed to demonstrate that it can successfully implement the Academic, Organizational, and Financial Plans.

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

Fall Far Below 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

Kamalani Academy

Rating

Fall Far Below the Standard

Plan Summary

The educational philosophy of Kamalani Academy focuses on bringing the arts into the classroom through cross-curricular integration. In addition, the school will implement English language arts and mathematics curricula that are based on the Common Core State Standards and use Positive Behavioral Supports to nurture the social and emotional growth of each child.

Kamalani Academy will offer kindergarten through grade 6 in its first year, then add grade 7 in its second year, and grade 8 in its third year. Doral Academy, Inc. ("Doral Academy"), a nonprofit charter management organization based in Florida, will serve as the school's educational service provider ("ESP") and as an affiliate, which would allow Kamalani Academy to use Doral Academy's trademarked instructional materials and instructional strategies.

The applicant has yet to develop or select the school's curriculum, so, in accordance with the application requirements, the applicant provided a curriculum development plan in its place.

Analysis

The Academic Plan **falls far below standards** because it is undeveloped and demonstrates lack of preparation. The applicant's responses raise substantial concerns about the viability of the plan and the applicant's capacity to carry it out.

<u>The Academic Plan does not provide a clear and comprehensive curriculum development plan.</u> The full curriculum development plan included in the application is as follows:

- *June 2015:Identify Principal for Kamalani Academy;*
- *June 2015-January 2016: Principal to identify Kamalani Administrative Team ;*
- *January through April 2016: Decide on Basal Text and other support materials to be used at Kamalani Academy that will best align with the Standards listed in the proposed Instructional Framework;*
- *February 2016-July 2016: Hiring of Teacher for Kamalani Academy; and*
- *Prior to the Start of School: Professional development days will be done in accordance with collective bargaining limits…The professional development for Kamalani Academy teachers will focus on the chosen basal text, development of course pacing, and arts integration.*

During the applicant interview, when the Evaluation Team asked the applicant to describe how this plan and the selected basal texts would lead to the development of the curriculum, the applicant did not provide a clear answer. The applicant's response focused on how the school would provide teachers with autonomy and access to online resources and did not reference curriculum development.

The limited information provided by the applicant about the curriculum development plan both in the application and during the interview, the absence of curriculum development activities in the plan, and the applicant's focus on unidentified "off-the-shelf" resources, such as basal readers and online

materials, demonstrate that the applicant does not fully grasp the scope and magnitude of the task of developing curriculum, particularly when it involves cross-curricular integration.

The Academic Plan does not present a comprehensive framework for rigorous, high-quality instructional design that reflects alignment with academic standards and addresses the needs of the school's anticipated population. Despite the school's stated emphasis on arts integration, the application does not identify specific arts integration pedagogy, nor does it describe how the schools' arts integration approach will be aligned with the Common Core State Standards and is intended to be woven into the Academic Plan.

Likewise, the application adequately describes methods for identifying students who may be eligible for special education services and the strategies that the school will use to meet the diverse needs of all students; however, it does not explain how the identified strategies (providing curriculum, daily schedule, instructional needs strategies, and resources, as well as using research-based methods and instructional techniques from intensiveintervention.org) will achieve this goal.

The Academic Plan does not provide a clear and comprehensive plan for how the proposed school will assess the progress of individual students, student cohorts, and the school as a whole on identified metrics. The plan fails to illustrate how the progress of individual students will be assessed on identified metrics or goals. For example, one of Kamalani Academy's identified goals is for eighty percent of the students enrolled at the school for three years to achieve proficiency or higher on the annual statewide assessment. When asked to describe how the proposed school would assess or demonstrate progress toward this goal, the applicant was unable to explain how student performance would be measured, what targets would be used to demonstrate progress, and why the goal is important and relevant to the school's mission and its students' academic achievement.

The applicant's inability to articulate this basic information in the application and during the applicant interview indicate that the applicant lacks the necessary knowledge and capacity to assess student academic performance and progress.

While the application contains many assurances that, once developed, the curriculum and instructional design will be of high quality and will meet all of the stated application requirements, it includes very little detail about the development of an arts-integrated, standards-aligned curriculum and the implementation of the Academic Plan.

Organizational Plan

Kamalani Academy

Rating

Does Not Meet the Standard

Plan Summary

Kamalani Academy proposes a governance structure that consists of the governing board leading the school, a school principal that will be the instructional and academic leader of the school, and an EMO, Academica, that will be responsible for the financial and organizational administration of the school. The school principal and Academica have a lateral relationship in the organizational structure and will work collaboratively to administer the school.

Kamalani Academy intends to create a nonprofit organization to act as the school's foundation. The nonprofit organization would support the school by engaging the community through fundraising activities and searching for and applying to grants that could generate funds for the school.

Analysis

The Organizational Plan **does not meet standard** because it has substantial gaps, lacks detail, and requires additional information in the Start-Up Period area. The plan does not provide enough accurate, specific information to show thorough preparation and fails to present a clear, realistic picture of how the school expects to operate.

<u>The Organizational Plan does not provide a detailed, comprehensive start-up plan specifying tasks, timelines, and responsible individuals aligned with the start-up budget for each major area (facility, funding, student recruitment and outreach, faculty and staff, and proposed school governing board).</u> The start-up plan provided by the applicant is a significant weakness that negatively impacts the Organizational Plan as a whole. Through responses in the application and interview, the applicant team is relying on its selected management company to lead the start-up activities yet the management company did not share the necessary details in its plan to get the school started. The start-up plan fails to provide specific activities and actions that the applicant will need to complete during the start-up period. The plan provided by the applicant, instead, lists only the following general vague activities:

- *Identifying facility funding- the school will need to secure financing before any contracts or acquisitions;*
- *Marketing- the school will market via multiple modes to ensure that all families are informed of their educational options;*
- *Hiring school personnel- the school intends to identify a Principal as soon as possible and hopes to have all teaching and staff positions filled prior to the intended opening date for the school of August 2016; and*
- *Transitioning from a Founding to Governing Board.*

The start-up plan further fails to identify any individuals who will lead the planning and start-up plan and instead mentions only the founding board. On numerous occasions, the Evaluation Team requested the applicant to identify specific individuals who would lead start-up activities. In the capacity interview,

Kamalani Academy representatives identified only a single member of the applicant team that would be available on a full-time basis to complete the start-up activities, and in fact, the other members of the applicant team stated that they all had full-time jobs that are their priority. When again asked in the Request for Clarification to clarify and identify the specific individuals who would be completing start-up tasks, the applicant again failed to identify anyone specific, including the member of the applicant team who stated he was available full-time in the capacity interview. The sole reliance on a single full-time volunteer does not inspire confidence in the applicant's capacity to implement the start-up plan.

The Organizational Plan does not provide a description of the roles and responsibilities of the EMO that adequately and accurately captures the EMO's organizational structure and how such structure relates to the governance and operation of the proposed school. According to the organizational chart, the school principal and Academica have a lateral relationship, meaning that they are on the same level of authority. When asked to clarify this relationship, the applicant explained that the principal will be responsible for the educational program and Academica will be responsible for the organizational and financial operations of the school. It is the applicant's intent that both will collaboratively administer the school.

This lateral relationship raises concerns because this organizational structure requires the governing board to assume all oversight responsibilities of the EMO. It is unclear what would happen in the event of a dispute between the principal and Academica. This relationship is further complicated because the governing board will conduct performance evaluations of the principal and Academic, with each providing input on the other as part of the evaluation. This is particularly concerning as Academica is currently assisting the applicant in the recruitment and selection of a school principal, and this assistance goes so far as Academica identifying candidates and assisting in interviews of school principal candidates. The Evaluation Team is concerned that this could affect the ability and willingness of the school principal to provide an unbiased evaluation of Academica.

Financial Plan

Kamalani Academy

Rating

Does Not Meet the Standard

Plan Summary

Kamalani Academy's governing board will provide oversight for all aspects of the financial management of the school. Under the supervision of the board, Academica will be responsible for financial operations, including bookkeeping and financial reporting. The School Principal will supervise day-to-day cash collections at the school.

The contracted fee for Academica is based on a per child fee of $450. In the first three years of operation, Academica will reduce the fee to $275, $350, and $375, respectively. The school will also have an affiliation agreement with Doral Academy that will cost the school one percent of its per-pupil revenue. In Year 1, the cost to the school will be approximately $22,000.

To accommodate its targeted enrollment of 350 students in Year 1, Kamalani Academy will need to secure a facility with approximately 18,000 square feet. The school's financial plan is predicated on securing the facility in the Hawaii Kai area with an annual lease rate of approximately $434,000. Kamalani Academy has secured a letter of interest from the Turner-Agassi Charter School Facility Fund, a nonprofit organization based in California that provides facility funding to charter schools across the nation.

The following chart provides the budget revenues, expenses, and operating gains or losses for years 1 through three:

	Total Operating Revenues	Total Operating Expenses	Total Operating Gain/(Loss)
Year 1	$2,170,000	$2,107,815	$62,185
Year 2	$2,480,000	$2,434,111	$45,889
Year 3	$2,790,000	$2,745,415	$44,585

Analysis

The Financial Plan **does not meet standard** because it has substantial gaps, lacks detail, and requires additional information in one or more areas. The plan does not provide enough specific information to show thorough preparation and fails to present a clear, realistic picture of how the school expects to operate. The lack of start-up funding and a contingency plan, coupled with the high expense items and the high enrollment targets, severely weakens the applicant's Financial Plan and significantly increases the risk of failure that could befall the school should its actual enrollment figures fall below its targets.

<u>The Financial Plan does not provide complete, realistic, and viable start-up and three-year operating budgets.</u> The Organizational Plan section of this report identifies Kamalani Academy's start-up plan as a significant weakness. This weakness is further highlighted by the financial information provided in the applicant's budget. A review of the Year 0 (start-up period) budget identifies a $25,000 contribution from Academica as the only funding provided in this period. The only line item in the Year 0 budget is $25,000 for recruitment/advertising, which indicates that the funds are only intended to provide

resources for marketing, recruitment, and parent interest meetings. The start-up plan mentions that the founding board intends to seek out grants or donations to supplement start-up activities but does not provide any information or details on what grants the applicant will apply for, when the applicant will apply for these grants, and the anticipated funding that these grants would provide.

The Financial Plan does not provide a sound contingency plan to meet financial needs if anticipated revenues are not received or are lower than estimated. Overall, the financial plan is based on the school achieving high enrollment targets in its first three years—350, 400, and 450 targeted student enrollment, respectively. As evidenced by charter schools that have opened in Hawaii in the last three years, achieving enrollment targets and the subsequent effect that it has had on the schools' budgets have presented challenges for new charter schools. Further, the financial plan submitted by the applicant has several high cost items in Year 1 of the budget, including the Hawaii Kai facility lease; the services from Doral Academy and Academica; approximately $120,000 to lease instructional materials, computers, furniture, and equipment; and staffing costs for 22 positions.

The applicant's budget narrative states that should anticipated revenues be lower than estimated, Kamalani Academy would receive counsel from Academica and the school's administrator to derive a "financial plan." The absence of a contingency plan can only lead the Evaluation Team to conclude that the aforementioned "financial plan" is actually the contingency plan. The absence of a contingency plan is especially troubling given the high enrollment targets. While the applicant has built a contingency fund of about $62,000 into the Financial Plan, the contingency fund would be wiped out if the school missed its enrollment target by just ten students, or less than three percent of its projected enrollment in Year 1. An adequate contingency plan would explain the actions the school would take should it fail to meet enrollment targets by a more substantial amount, such as 10-15%. In Kamalani Academy's case, a 10% drop from its targeted enrollment would amount to 35 students and a substantial loss in the per-pupil allocation of $217,000.

Evidence of Capacity

Enter the proposed school name	Rating
Kamalani Academy	**Does Not Meet the Standard**

Plan Summary
Kamalani Academy has identified the following individuals as key members of its applicant team:

- Kuuipo Laumatia, who has educational experience as an adjunct professor at Hawaii Pacific University and experience in founding and supporting nonprofit organizations;
- Lei Cummings, who has educational experience with BYU-Hawaii and is the current president of The Mana´olana Foundation, a Native Hawaiian nonprofit organization;
- Steven Davidson, who has financial experience in the banking industry and has served as a consultant to a nonprofit organization; and
- Dr. Patrick Macy, an educator with more than 20 years of experience in public education on multiple levels.

Kamalani Academy will contract with Doral Academy, an educational service provider that will conduct professional development and allow the school to use its educational programs. Kamalani Academy will also contract with Academica Nevada to serve as its educational management organization that will be responsible for financial and organizational management.

Analysis
The Evidence of Capacity **does not meet the standard** for approval because the applicant does not inspire confidence in its capacity to carry out the proposed plan effectively. The applicant failed to provide sufficient evidence that its key members possess the collective qualifications—including a demonstrated understanding of challenges, issues, and requirements associated with running a charter school—to implement the proposed school's Academic, Organizational, and Financial Plans.

The Academic Plan falls far below standards, as it lacks a clear and comprehensive curriculum development plan, fails to explain how the arts will be integrated into the academic framework of the school despite a focus on arts integration, and does not provide a clear and comprehensive plan for how the proposed school will assess the student progress and performance. Overall, the deficiencies seen in the Academic Plan demonstrate the applicant's lack of academic capacity.

The applicant also failed to demonstrate evidence of capacity to implement the Organizational Plan. Lack of capacity is demonstrated by the applicant's inability to develop an adequate start-up plan. Instead the start-up plan contains a vague listing of tasks, provides little to no detail on specific actions occurring in the start-up period, and identifies only a single member of the applicant team who would be committed to performing the start-up activities and tasks.

Finally, the applicant failed to demonstrate evidence of the capacity to implement the Financial Plan due an unrealistic budget for Year 0 and the lack of a contingency plan. For Kamalani Academy, a viable, clear contingency plan is especially crucial due to the high enrollment targets set by the applicant. The Evaluation Team determined that only a three percent drop from the enrollment targets would have a

significant impact on the budget. The applicant team's reliance on Academica to develop a contingency plan after enrollment targets are not met emphasizes the team's lack of financial capacity.

Evaluator Biographies

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 (such as the audit of Hawaii's charter schools and a study of the Hawaii Teacher Standards Board) where he analyzed agency effectiveness and efficiency and identified internal control weaknesses. 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.

Beth Bulgeron

Ms. Bulgeron is the Commission's Academic Performance Manager. She previously worked as an administrator in charter schools in Chicago, Illinois and Santa Cruz, California. She has developed standards-based curriculum and assessments for public school districts and charter schools and has served as a curriculum consultant. Prior to that, she taught for five years in charter high schools. She earned her BA at the University of Wisconsin, Madison and her JD and LL.M. in Education Law and Policy at the University of the Pacific, McGeorge School of Law.

Jeff Poentis

Mr. Poentis is the Commission's Financial Performance Specialist. He has extensive accounting experience and is a Certified Public Accountant with over 18 years of experience in both the private and public sectors. He holds a Bachelor of Business Administration from the University of Hawaii at Manoa.

Kirsten Rogers

Ms. Rogers is an Evaluation Specialist in the Department of Education's Accountability Section, which administers the public school system's statewide accountability program with a focus on developing and implementing educational indicators on school performance. She formerly served the Commission as its Academic Performance Specialist. She has experience as a middle school teacher at both a charter school in Tennessee and at Wheeler Intermediate, a DOE school in Hawaii. She is a Teach for America alumnus, a former corps member advisor, and former content community leader for the organization. She also holds a Master of Education in Teaching from the University of Hawaii at Manoa.

Kenneth Surratt

Mr. Surratt has nearly 20 years of business and operations management and analysis experience, half of which has been in education-related roles. He has worked for Charter Management Organizations, including management positions with KIPP (the largest charter school network in the nation) and as the Chief Financial Officer of Breakthrough Charter Schools. He also served as the Assistant Director of CREDO (Center for Research on Education Outcomes) at Stanford University when it authored one of the largest charter school studies in the country. He holds an MBA from Duke University's Fuqua School of Business.

GG Weisenfeld

Dr. Weisenfeld has nearly 28 years of experience in education, specializing in elementary and early childhood education. She most recently served as the Director of the Executive Office on Early Learning in the Office of the Governor and wrote the state's federal Preschool Development Grant application for Hawaii's charter schools. She also has extensive experience teaching, training, and managing teachers and served as Board President of Lanikai Elementary Public Charter School. She holds an MS in Elementary Education from Bank Street College and an Ed.M. and Ed.D. in Educational Administration from Columbia University's Teachers College.

Exhibit B

Applicant Response for Kamalani Academy

Executive Summary

The Kamalani Team was extremely surprised when informed of the Evaluation Team's final recommendation for denial of a charter authorization. The Kamalani Team received very little feedback during the process that would have alerted it that there was any problem with the application. The Initial Proposal passed at least the minimum threshold in three of four areas, with a minor omission in the fourth. In the Capacity Interview, there were few follow-up questions or indications that Kamalani's responses were inadequate. There were more than two-dozen Clarifying Questions, none of which appeared to indicate a serious problem with the application. At each step along the way, Kamalani provided detailed responses to each question asked. Then, in a completely unexpected fashion, the application was summarily denied in all four areas of the Final Evaluation.

The Kamalani Team is confident that an objective reading of the application and responses to the Request for Clarification will provide more than ample evidence of Kamalani's capacity. The Kamalani Team respectfully requests that the Application Committee and Hawaii State Public Charter School Commission review the response included herein. Throughout this document, there are references to the detailed contents of the application that support our statements.

Evidence of Capacity

The Evaluation Team found that "the applicant failed to provide sufficient evidence that its key members possess the collective qualifications—including a demonstrated understanding of challenges, issues, and requirements associated with running a charter school—to implement the proposed school's Academic, Organizational, and Financial Plans."

This conclusion can only be reached when relevant information is omitted or ignored from the analysis. **A complete review of the experience and knowledge of the Governing Board, Advisory Board, and Strategic Partners, combined with the practical experience of the Board's management partners, demonstrates that Kamalani Academy clearly possesses the capacity to open and operate a successful charter school. Not only do key members of the Kamalani Team possess a wealth of academic and educational experience, many of our key members currently own and operate successful businesses.** In addition, the Evaluation Team report does not reference members of the Advisory Board, who have been intimately involved in the development of the school.

For example, the Evaluation Team summarizes Dr. Patrick Macy as simply, "an educator with more than 20 years of experience in public education on multiple levels." This grossly understates his knowledge and experience. Similarly, the one line summaries of the other Board Members ignores their extensive experience in technology, education, communication, project management, law, taxes, financial management and planning, operating successful businesses, and all skills necessary for the successful startup and operation of a Hawaii Public Charter School.

The Final Recommendation Report completely omitted the substantial capabilities of Academica, which has assisted Founding Boards in opening over 100 successful charter schools in 5 states and the District of Columbia. In Florida, where Academica provides management services for 72 charter schools, their services have "…resulted in 15-year charter

renewals for all schools which have had initial contracts completed."[1] Furthermore, the Final Recommendation Report ignored the fact that Academica has committed, once a charter has been granted, to hire **two Oahu-based, full-time employees to work on start-up and management activities** prior to Kamalani's opening. Kamalani will receive additional support from Academica's regional office.

The following is a summary of the Kamalani Founding Team credentials. Some of the most outstanding and relevant experience is in **bold**. The full resumes of both boards were included in Attachment X in the charter application. Supporters, strategic partners of Kamalani who also have a wealth and breadth of experience successfully starting, operating, and participating in local arts-integration educational programs, Hawaiian focused cultural programs, and charter school facility financing, are listed below and should be considered as contributors to the capacity of Kamalani's charter application.

The Kamalani Founding Board Members include:

Ku`uipo Laumatia is currently the **owner of four successful businesses and Board Chair of a Native Hawaiian-Owned Non-Profit Corporation**. Ku'uipo is an experienced Business Leader (20+ years) in these industries: utility, education, training, telecommunications, information technology, pharmaceuticals, finance, health, insurance, the military, and state, city and county governments. **She has established more than ten Project Management Offices at major companies.** Ku'uipo has also served as an Adjunct Professor, Academic Dean, Education Director, and a **Project/Program Manager, DOE, Windward District.** Ku'uipo has a BA in Information Systems, an MBA in Human Resources Management, and is a certified Scrum Master.

Lei Cummings currently **serves as the Associate Director of Major Gifts, LDS Philanthropies Hawaii and has helped to raise millions of dollars**. **She is the current owner of two successful business ventures**. Lei served as the **Director of Marketing** & Executive Programs, BYU-Hawaii-Center for Instructional Technology and Outreach and the Director of Marketing & Executive Programs, BYU-Hawaii-Center for Instructional Technology and Outreach, and Information Systems Adjunct Faculty, BYU-Hawaii. Lei has a BS-Computer Information Systems and an MBA-Information Technology.

Dr. Patrick Macy currently serves as an International Student Advisor at BYU Hawaii. **Patrick served on the Hawaii Teacher Standards Board and was responsible for the initial licensing for all teachers in the State of Hawaii.** Patrick has been a **Principal, Vice-Principal, and counselor for Hawaii DOE schools.** He was the **Superintendent of Red Mesa Unified Schools, AZ and Assistant Superintendent of Page Unified Schools, AZ.** Patrick has served as a **High School Principal in both Arizona and Utah** as well as an **Elementary School Principal in Alaska.** He has been a **high school teacher** and also served as an **Assistant Professor of Education, Community School Director in Utah and a College Counselor in Arizona. Patrick has a BS-Physical Education, ME-Education Administration, and EdD-Educational Leadership.**

[1] www.academica.org

Mark Kohler is **a tax attorney**, **CPA**, best-selling author of three books, a well-known national speaker, and radio talk show host. **Mark owns a successful law firm and an accounting firm.** Mark is a Senior Partner of Kyler, Kohler, Ostermiller & Sorenson, Co-Owner of Koher & Eyre, CPAs and holds the M.Pr.A., C.P.A. and J.D credentials.

Jarrett Macanas is a **native Hawaiian attorney and business owner of Macanas Law Firm specializing in Hawaii Estate Planning, Business and Tax Law.** Jarrett has a Masters of Law in Taxation and is a J.D.

Dr. Steve Davidson is a certified **Project Management Professional** and serves as a **Project Manager/Consultant/Instructor for a native Hawaiian-owned non-profit.** As a Franklin-Covey consultant, Steve **taught courses in personal effectiveness, productivity, time management, and project management**. Steve was a **Senior Program Manager** in the securities industry and has experience as an **Executive Investment Consultant, Financial Advisor, and Certified Financial Planner.** Additionally, Steve served as the **Chief Psychologist, Family Systems Therapist**. Steve has a BS-Engineering, ME-Counseling Psychology, and **EdD-Counseling Psychology.**

Blaine Fergerstrom is currently Technical Analyst and **Project Manager at State of Hawai'i Office of Information Management & Technology, Program Management Center for Excellence. Blaine has owned his own Website design, graphic arts, photography, and consulting company since 1988. Blaine served as the State of Hawaii Department of Hawaiian Home Lands Acting Public Information Officer, Communications Specialist, Journalist, and Webmaster.** Blaine was the Acting Public Information Officer, staff journalist and webmaster for the **State of Hawaii Office of Hawaiian Affairs, Kamehameha Schools**, and Honolulu Star-Bulletin. Blaine has been the **Production Manager at several large Hawaii advertising firms** including Milici Valenti Ng Pack and Starr Seigle Advertising. Blaine was a consultant for the Honolulu Weekly newspaper and Castle Medical Center. Blaine has a BS in Computer Information Systems.

The Kamalani Advisory Board Members include:

Rae Takemoto currently serves as the **Turnaround Arts Hawai'i, Local Program Director with the President's Committee on Culture and the Arts.** She is a **member of the Kennedy Center Partners in Education, and Maui Arts and Cultural Center-Arts Education Advisory Board,** and is the **Maui Arts and Cultural Center-Arts Integration Mentor.** Rae served as the **Arts Integration Literacy Curriculum Coordinator/Coach at the DOE's Pomaika`i Elementary School on Maui.** In her role, she **developed sustainable whole school arts integration curriculum and ensured that the curriculum met all Common Core standards and Strive HI requirements**. She assembled extraordinary resources to provide arts-integrated learning opportunities for students and professional development opportunities for teachers. Additionally, Rae has **presented to the Hawaii DOE, cultural, professional, and national US DOE groups.** She served as an **Elementary School Teacher** and was named **State of Hawaii Global Teacher of the Year** in 2003**.** Rae has a **B.Ed. Elementary education and a Professional Diploma (M.Ed. equivalent) Elementary Education.**

Dr. VerlieAnn Leimomi Kapule Malina-Wright is currently a **Cultural Consultant Strategic Vision Kupuna, in the areas of international, national, state and county in interdisciplinary culture-based education.** -- STREAM (science, technologies, reading literacies, engineering, art design AUTO CAD, and math. She is **Board Chair for the Pacific American Foundation, and Hawaii Maoli, 501c3 Native Hawaiian non-profits**. VerlieAnn has served as **President of the National Indian Education Association (NIEA) and received the Civil Rights Award for Native Language Preservation.** She currently is a Cultural Consultant for Indigenous Ed Institute a Native Am Science and Traditional Ecological Knowledge - space and earth sciences; creative digital media, and rail transit. She is retired as **Vice Principal at Kua Kaiapuni o Anuenue public Hawaiian Language Immersion School, Hawaii DOE and served as Vice Principal and secondary education teacher and adjunct faculty at UH Manoa College of Ed**. She retired from Kamehameha Schools as Director of Continuing Ed Programs. VerlieAnn has a **B.B.A.-Business Administration, M.Ed.-Curriculum and Instruction, and Ed.D. Education Administration.**

Dr. Jamie Simpson Steele is currently an **Assistant Professor in Performing Arts at UH.** She is a **research specialist** and has written **papers on the effects of arts integrated curriculum in Hawaii and its impact on the lives of children**. Jamie has also served as an **Assistant Professor at the School of Education, HPU**. Jamie is a former Instructor with the School of Education at UH, **Drama Education Associate at the Hawaii Theatre for Youth**, Teaching Artist at NYU, and Instructor at Duke University. Jamie has a B.A.-English, **M.A.-Educational Theatre**, and **Ph.D.-Curriculum and Instruction**, Emphasis in Performing Arts of the Pacific.

Evan Anderson currently fills these roles at **Voyager Charter School: Arts Integration Coach, Administrative Coordinator, Training and Methodology Coordinator, Teacher.** He serves on the **Leadership Team** and is **responsible for curriculum development in conjunction with the world wide voyage of sailing canoes Hokule'a and Hikianalia. Evan is a member of the Kennedy Center for the Arts—Partners in Education Arts Integration.** He coordinated and expended a **research-based reading comprehension program as a trustee and consultant to provide educational services for at-risk youth.** Evan has a B.A.-Politics and a **M.A.-Educational Leadership.**

Dr. Beth P. Uale is a **music teacher at Kawaihona o Ka Na'auao, a Hawaiian based charter school**. She is the **owner of a music studio** in Hawaii Kai and directs church and community choirs of all ages. Beth serves as an **Adjunct Professor of Music and Adjunct Professor of Education.** She has **thirty years of experience as a music educator** in private and public schools. Beth has a B.A.-Music, **M.A.-Music Education, and Ed.D.-Educational Leadership and is completing her dissertation for a second doctorate, in Music Education.**

Lei Ahsing is currently the **Education Director for Hawaii Arts Alliance and has served in this position for 20 years. She designs arts program content that supports Common Core State Standards and develops and has coordinated Arts First Institutes for elementary school teachers for 15 years. Lei provides professional development for teaching artists and supervised the US DOE study of the effects of standards based education on student achievement in reading and on teacher pedagogy.** She is currently the Turnaround Arts Implementation Coordinator, with the President's Committee.

Alapaki Nahale-a is currently **Commissioner on the Presidential Scholars Commission and the Principal of Laupahoehoe Community Public Charter School**. He was formerly the **Dean of Students & Instruction** at LCPCS. He served as the **Director of Community Education – Hawaii Island, Kamehameha Schools Executive Director, President-Hawaii Charter Schools Network**, and was the **Director, Local School Board Member & Chairperson, Ka Umeke Kaeo Hawaiian Immersion Public Charter School.** Alapaki was the **Development Director who was responsible for tracking the progress of grants under the Native Hawaiian Higher Education Act.** He assisted in evaluating programs to ensure that grant goals and objectives were met while maintaining grant compliance. Additionally, Alapaki served as the Department Director & Chairman of the Commission at the Hawaiian Homelands Trust and was the **East Hawaii Commissioner for the County of Hawaii Charter Commission.** He has a BA in Political Science.

The Kamalani Strategic Partners and Community Supporters:

- Hawaii Arts Alliance
- Honolulu Theater for Youth
- Hawaii FusionED
- Honolulu Museum of Art
- Waikiki Hawaiian Civic Club
- University of Hawaii College of Education
- Pacific American Foundation
- The Mana'olana Foundation
- Turner Agassi Charter School Facilities Fund

Clearly, the Evaluation Team abbreviated, understated, and artificially limited the knowledge and experience of Kamalani Academy's Founding Team in their analysis. Furthermore, the evaluation team failed to recognize and appreciate the wisdom the Board shows in partnering with consultants, affiliates and support organizations that will counsel them in those matters specific to charter schools. In the Final Recommendation Report, the summaries of the Evaluation Team members themselves were well developed and accurately stated, which resulted in them taking up an entire page of the review document. At the same time, the summaries of the Kamalani Board Members' experience and knowledge were shortened to the point of inaccuracy. **When considered jointly, the total capacity of the Kamalani Founding Board; Advisory Board; Strategic Partners; Doral Academy administrators, faculty and staff; and Academica reveals decades of experience overseeing thousands of students in highly successful charter schools.** Thus, the educational, financial, and operational capacity of the Kamalani Academy Team, as a whole, is more than adequate to the task of starting and running a successful charter school.

Financial Plan

The Kamalani Academy Founding Board began the process of applying for a charter with the understanding that the main cause of charter school failure across the country is financial mismanagement. Knowing this, the assumptions made for revenues and expenses throughout the financial plan were calculated to be conservative to protect the school from financial hardships

that might arise. Kamalani's Board has extensive professional expertise in business, education, management, finance, and accounting. Kamalani, in the process of drafting the financial plan, also sought out the advice of local charter school experts and Educational Management Organization Academica (20 years of experience). Kamalani's Board strongly feels that **the financial plan produced** does not show a lack of "thorough preparation" or "fails to present a clear, realistic pictures of how the school expects to operate," but **is a conservative guide map to Kamalani Academy's first 3 years of operation.**

The 2014 Final Application Recommendation Report stated, "The Financial Plan does not provide complete, realistic, and viable start- up and three-year operating budgets. The Organizational Plan section of this report identifies Kamalani Academy's start-up plan as a significant weakness. This weakness is further highlighted by the financial information provided in the applicant's budget. A review of the Year 0 (start-up period) budget identifies a $25,000 contribution from Academica as the only funding provided in this period. The only line item in the Year 0 budget is $25,000 for recruitment/advertising, which indicated that the funds are only intended to provide resources for marketing, recruitment, and parent interest meetings."

Kamalani Academy is following a start-up model that is widely used across the country in which they will use their start-up funds for marketing, recruitment, and parent interest meetings. This financial model has been used successfully to open over one hundred Academica supported schools nationwide.

The Board will hire a school principal by January 2016. The principal during the start-up phase will be responsible for recruiting teachers (locally and out of state), curriculum identification and appearances at open house meetings. The principal will not be a salaried employee until the start of the 2016-2017 fiscal year. Every potential principal that the Board has spoken with has expressed a willingness to donate this time during the start-up phase.

The Board will have assistance from local full-time employee(s) from Academica. **Academica will be responsible, without charge, for many services during the start-up phase** including: bidding contracted services (janitorial, payroll, legal, IT, etc.), facility management, procurement (curriculum, technology, furniture), state reporting, board meeting assistance, marketing, teacher recruitment assistance, managing a lottery system, and human resources for new employees. Academica will not receive a management fee from Kamalani until the fiscal 2016-2017 school year starts and will not back charge Kamalani for the work done during the start-up phase. **Thus, the entire $25,000 will be used for marketing and recruitment.**

The 2014 Final Application Recommendation Report stated: "the Financial Plan does not provide a sound contingency plan to meet financial needs if anticipated revenues are not received or are lower than estimated."

Kamalani in their application stated that they would consult with their management company to develop a financial plan to meet the financial needs if anticipated revenues were lower than estimated. Additionally, Kamalani stated that they would consider: payment extensions or downsizing of contracted services and negotiating a temporary lease rate adjustment with the landlord. After the application was submitted, the Evaluation Team responded with a Request for Clarification. **Nowhere in the Request for Clarification Report did the Evaluation Team ask for clarification of the Board's contingency plan.**

The Evaluation Team then, in their Final Application Recommendation Report, stated,

"An adequate contingency plan would explain the actions the school would take should it fail to meet enrollment targets by a more substantial amount, such as 10-15%".

Unfortunately, **the application instructions for a contingency plan were vague and did not include assumptions for the contingency plan to include a shortage of revenue in the amount of 10-15%. Had the question been structured in a more specific manner**, directing the school to adjust their budget to a 10% loss in expected students, the response would have included the following information: First the school would look to consolidate two classes that lack enrollment into one. This would reduce the teacher staff from 14 to 13 and reduce the budgeted expense for staff by $48,500. The decrease in teaching staff would lower the substitute teacher budget line item by $1,500 as well. Additionally the school would consolidate the office manager and registrar positions into one, which would amount to a reduction of $40,000 in the budgeted registrar line item. The 10% drop in student population would directly correlate with a 10% drop in many expense line items such as: management fee ($9,625), affiliation fee ($2,170), leased instructional materials ($10,500), IT Support ($1,500), general instructional supplies ($2,500), Instructional Software ($500), Lunch ($900), Copier ($2,000). Lastly the school would receive a 10% reduction in the cost of facility lease ($43,400). In addition to the expense cuts mentioned above, the Board would find alternative ways to save the school money such as purchasing used computers, purchasing used furniture, reduction in contracted services or cancellation of contracted services. If the school were to make the cuts listed above ($163,095), with their planned contingency fund ($62,185), the school would be able to have a positive year-end fund balance, even with a drop in revenue of $217,000. **Kamalani's Board of experienced business owners and professionals, along with the considerable expertise of Academica, would be able to manage the contingency of a 10-15% drop in enrollment.**

Organizational Plan

As set forth within the Evaluation Team's analysis, *"Kamalani Academy proposes a governance structure that consists of the governing board leading the school, a school principal that will be the instructional and academic leader of the school, and an EMO, Academica, which will be responsible for the financial and organizational administration of the school. The school principal and Academica have a lateral relationship in the organizational structure and will work collaboratively to administer the school."* This structure is clear, functional, and indisputably successful. **There can be no reasonable argument that this structure is not successful when dozens of schools in several other states are operating within this organizational plan and create exemplary results, both academically and financially.**

Despite the fact that the Kamalani Academy model is a replication of a successful and proven structure, the Evaluation Team concludes the plan does not meet standards. This conclusion is based on two negative findings. As detailed below, those negative findings are not supported by the evidence, limited by the content limits of the application and interview, and ignore model best practices.

First, the Evaluation Team finds that the Organizational Plan does not provide a detailed, comprehensive start-up plan. The application process is inherently limited. The application has strict word limits, the interview has strict time limits, and the interview process limits the number of people allowed to participate. These parameters inevitably limit the amount of detail that may be presented and prevent the school from demonstrating the collective

knowledge of all of the people who will support the start-up of the school.

Furthermore, a certain amount of flexibility is necessary. The school is in the process of being formed and the needs and steps of the formation process may vary greatly throughout the start-up process. An overly detailed, step-by-step plan of start-up procedures ignores the fact that enrollment, staffing, facilities or finances may all encounter setbacks or successes that will result in an altered timeline. A strict timeline or more detailed list ignores these realities.

The real question before the Evaluation Team was whether or not the Kamalani Academy team understands all of the steps involved in start-up and can successfully execute them. **Considering the fact that the Kamalani Team includes professional project managers, business owners, attorneys, a CPA, a former school superintendent, an educational management organization which has opened dozens of successful charter schools, and affiliation with highly successful Doral Academy Inc., then it would be impossible to reasonably conclude that the team cannot successfully complete the start-up process.**

In addition to questioning the language of Kamalani Academy's start-up plan, the Evaluation Team claims that Kamalani Academy "*identified only a single member of the applicant team that would be available on a full-time basis to complete the start-up activities.*" This is simply not true. Academica was directly asked during the Capacity Interview if they would be hiring local staff to support the start-up of the school. **Academica responded they would hire full-time staff based in Hawaii. As such, the start-up team consists of Board Members dedicating time to the school, one of them on a full-time basis, full-time employees of the Board's contracted management company working under the direction of the Board, supporting faculty from Kamalani Academy's affiliated Doral Charter schools, and members of the school community volunteering their time for the school.** Again, it cannot be reasonably argued that this structure does not work, as dozens of successful schools have been opened under this model.

Finally, the Evaluation Team broadly stated that "*the Organizational Plan does not provide a description of the roles and responsibilities of the EMO that adequately and accurately captures the EMO's organizational structure,*" but provided only one criticism to support that conclusion. Specifically, the Evaluation Team claimed that Academica's lateral relationship with the principal is in question because Academica assists in the interview and hiring process for the Principal. **The Evaluation Team failed to explain how Academica assisting in the hiring process limits a principal's ability to openly and honestly communicate in the future.** Indeed, having individuals in lateral positions participate in hiring processes is a standard, positive, and collaborative practice. Many schools have teachers sit with administrators during interviews and participate in selecting other teachers. That would in no away affect the newly hired teachers' ability to perform in their positions in the future. Nor does it infer that the newly hired teachers report to the teachers who assisted in the selection process. It is simply a good, collaborative practice drawing upon the shared knowledge of all of the members of an organization to ensure selection of the best possible candidate. In the end, the final hiring decision belongs to the Board and the organizational structure clearly demonstrates that both Academica and the principal report to the Governing Board.

Academic Plan

The Initial Proposal in the charter school application process focused upon the Academic Plan only. In its Initial Proposal Recommendation Report, **the Evaluation Team found that Kamalani met, at least, the minimum requirements in Curriculum and Instructional Design, School Culture, Special Populations and At-risk Students, and Academic Plan Capacity**. The only area found deficient was School Calendar, Schedule, and Staff Structure. Regarding that area, they described the single omission as "minor." The Evaluation team concluded that, **"…the key board members who have been identified as playing a significant role in implementing the academic plan have the collective qualifications to implement the school plan successfully. The members identified have experience in curriculum development, instructional leadership, education leadership in general, governance, law, and finance, and past work experience shows that they have the capacity to implement the academic plan, provided that they all play a substantial role in the school.**

Nevertheless, several months later, the Evaluation Team, in its Final Application Recommendation Report concluded, *"The applicant's responses raise substantial concerns about the viability of the plan and the applicant's capacity to carry it out."* Between those two conclusions by the Evaluation Committee, there was **very little, if any, indication to the applicant that, somehow, the applicant's capacity to develop and execute the Academic Plan, had gone, in the eyes of the Evaluation Team, from at least adequate to "Falls Far Below the Standard."**

The 2014 Final Application Recommendation Report stated, *"The Academic Plan does not provide a clear and comprehensive curriculum development plan. The full curriculum development plan included in the application is as follows:*

- *June 2015:Identify Principal for Kamalani Academy;*
- *June 2015-January 2016: Principal to identify Kamalani Administrative Team;*
- *January through April 2016: Decide on Basal Text and other support materials to be used at Kamalani Academy that will best align with the Standards listed in the proposed Instructional Framework;*
- *February 2016-July 2016: Hiring of Teachers for Kamalani Academy; and*

Prior to the Start of School: Professional development days will be done in accordance with collective bargaining limits…The professional development for Kamalani Academy teachers will focus on the chosen basal text, development of course pacing, and arts integration."

In the application it was stated that the professionals who will implement them, the faculty and staff at Kamalani, would make final decisions on curriculum, texts, etc. The Governing Board, while setting the overall academic policy, including the choice to use arts integration as a foundation, feels it is best to let the professionals it hires make these decisions. Of course, monitoring of their work and overall responsibility for the academic success of Kamalani rests with the Board.

Kamalani Academy plans to replicate the highly successful curriculum model of Doral Academy Inc. (Doral.) **The Doral affiliation is a key partnership in the success of the curriculum development plan. Doral has opened and implemented this curriculum model and used these best practices at their schools in Florida and Nevada with outstanding results**. The Doral curriculum model includes four key components: 1). **Standards Aligned Curriculum** (to the state in which the school is located. Nevada, Hawaii, and Florida each have

aligned their ELA and Math Curriculum to the Common Core Standards); 2). **Arts Integration**: Arts integration incorporates best practices instructional strategies used to teach the curriculum; it fuses an art form with the learning process; 3). **Basal Textbooks and Other Support Materials**: standards aligned materials that support learning 4). **Data Driven Instruction Model**.

Within the response to Clarifying Question 3, an extensive, detailed example is provided to show how, in arts integration, an art form is used to teach a traditional academic subject. For the purpose of this Response Letter, a simplified example is provided. It might involve third graders drawing a soccer field as a way of learning about geometric shapes, dimensions, and measurement. Another example might have kindergarteners being instructed to get into groups with at least three girls as a fun way of learning the concept of "at least." Drama, drawing, song, dance, and music are all art forms that can be used. Extensive research has shown that arts integration approaches involve the whole child in active learning and that they can be successful with students who may not respond as well to traditional methods. In addition, success in the arts involves such non-academic skills as creativity, flexibility, goal setting, patience, and collaboration. All of these will be essential for success in a 21st Century we cannot even imagine. **The excellent performance of the Doral schools, detailed below, demonstrates that an arts integrated curriculum is a valid method for teaching traditional academic subjects.**

As cited in the Kennedy Center's 2012 report *The Intersection of Arts and Special Education: Exemplary Programs and Approaches*, "for all students, whether integrated into the curriculum or taught as a separate subject, [art] can lead to increased academic, social and functional skill development and knowledge."[2] Furthermore, "for students with disabilities, knowledge and skill development gained through the arts can play a crucial role in their overall success."[3]

Doral has the philosophy that each of their schools should meet the needs of the community in which they are located and the students they serve. Thus, every Doral school has considerable freedom to plan their own course scope and sequences and select the type of art-form (instructional strategies) that will be implemented in Year One and built upon in the following years. At the same time, the Doral affiliation provides support in best practices in

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[2] Catterall, J. S. (2009). *Doing well and doing good by doing art: A 12-year longitudinal study of arts education – effects on the achievements and values of young adults.* Los Angeles: I-Group Books, 2009. Deasy, R. J. (Ed.). (2002).
Critical links: Learning in the arts and student achievement and social development.
Washington, DC: The Arts Education Partnership.

[3] Hillier, A., Greher, G., Poto, N., & Dougherty, M. (2012). Positive outcomes following participation in a music intervention or adolescents and young adults on the autism spectrum. *Psychology of Music, 40*(2), 201-215.
Mason, C. Y., Steedly, K. M., & Thormann, M. S. (2008). Impact of arts integration on voice, choice,
and access. *Teacher Education and Special Education, 31*(1), 36-46.

implementing: a standards aligned curriculum, arts-integration best-practices, a data driven instructional model, positive behavioral support, support in starting a new school, staff training, and more. This model will allow Kamalani best to meet the needs of its unique community and students while having the support necessary to ensure success.

As referenced in VI.M.4.b of the application, **The Doral Academy Inc. curriculum model has been highly successful in the opening of six schools in Florida and two in Nevada.** The following elaborates the exemplary academic track record of the Doral Academy Inc. Schools:

Doral Academy, Inc. Data **Florida's State Accountability Performance Framework grades schools on an A-F scale.** **Nevada's State Accountability Performance Framework grades schools on a 5-1 Star scale.**												
School and Location	**2013-14**	**2012-13**	**2011-12**	**2010-11**	**2009-10**	**2008-09**	**2007-08**	**2006-07**	**2005-06**	**2004-05**	**2003-04**	**2002-03**
Florida												
Doral Academy, (Elementary)	A	A	A	A	A	A	A	A	A	A	A	
Just Arts and Management Charter Middle School	A	B										
Doral Academy Charter Middle School	A	A	A	A	A	A	A	A	A	A	A	
Doral Academy of Technology	A	A	A									
***Doral Academy Charter High School**	B	A	A	A	A	A	A	A	B	B	C	A
****Doral Performing Arts and Entertainment Academy**	A	A	A	A	A	A	A	A	A			

Nevada												
Doral Academy of Nevada (Elementary)	5 Star											
Doral Academy of Nevada (Middle School)	3 Star											
*Doral Academy Charter High School, Florida continues to be ranked as one of the nation's top high schools according to US News & World Reports. Fifty three percent of their population qualifies for Free and Reduced lunch and 94% are minorities. ** Doral Performing Arts and Entertainment Academy continues to be ranked as one of the nation's top high schools according to US News & World Reports. Fifty one percent of their population qualifies for Free and Reduced lunch and 91% are minorities.												

The curriculum development plan was further elaborated in professional development sections VI.D 1-5. This section includes detail on professional development prior to the opening of school, use of the Train the Trainer model, attendance at the Hawai`i First Summer Institute, exposure to some of the state's top teaching artists, mini-workshops during the school year, and planning meetings of the school faculty and staff to further elaborate the curriculum. Also found in this section of the application are lists of the texts to be used, the alignment with Common Core Standards, the school calendar in accordance with the HSTA bargaining agreement, and the entire plan for professional development during the school year. This section, also, stated that the Kamalani Academy principal would receive extensive training and support from the Doral administrative team (Nevada and Florida) to ensure success of the school.

The Final Recommendation stated, "*The Academic Plan does not present a comprehensive framework for rigorous, high-quality instructional design that reflects alignment with academic standards and addresses the needs of the school's anticipated population.*"

In fact, Kamalani Academy presented a comprehensive framework for rigorous, high-quality instructional design. The framework is standards-aligned and will address the needs of the school's anticipated population. As detailed above, Kamalani is replicating the very successful Doral curriculum model of arts integration. To repeat, that model includes an existing **standards-aligned curriculum, arts-integration best practices, basal textbooks and other instructional materials, and data-driven instruction**. All Doral Academy schools are accredited through AdvancED **and Kamalani will immediately, upon its opening, receive the same accreditation** through its Doral affiliation.

The Final Recommendation Report states that, "*The Academic Plan does not provide a clear and comprehensive plan for how the proposed school will assess the progress of individual students, student cohorts, and the school as a whole on identified metrics.*"

As was stated in the application and Capacity Interview, Kamalani will use data from the school's chosen assessment (STAR or AIMSweb) to monitor their students'

progress and drive instruction as detailed in application section III.B.3-4. This data-driven approach, further described below, ensures that the needs of all students are met through the curriculum model.

Monitoring of student growth and achievement is core to the Kamalani Academy's mission and vision and this **was addressed throughout the charter application**. The Governing Board set two overarching goals to measure and ensure student achievement. **"Goal #1: Eighty (80) percent of students enrolled at the school for a three consecutive year period will achieve proficient or advanced status on the state's annual assessment**. This goal is applicable to students upon the third consecutive year of enrollment, who are registered in the third through eighth grade. This goal will be measured by Hawaii's chosen standardized assessment which is currently the SBAC and HAS in Science. The school's chosen internally reliable standardized assessment (STAR or AIMSweb) will monitor progress towards this goal, as detailed below. **Goal #2: Seventy (70) percent of students will improve at least 1 year growth in reading and mathematics skills annually**. STAR or AIMSweb will be used to monitor progress toward this goal."

Quoting from section III.B.4 of the application, "using data to evaluate students, monitor students' progress, set goals, and drive instruction is core to the instructional model of Kamalani. Patterned after Doral Academy, frequent data collection, particularly for students performing below grade level, is fundamental to improvement. Utilizing these data, the results from ongoing assessments will be used to drive instruction. In the classroom, teachers will differentiate instruction based on the needs of students. School-wide results will be utilized to target faculty professional development and foster professional learning communities and revise, as may be necessary, the instructional focus calendar."

This same section of the application states, "Central to the Kamalani vision statement is the goal to increase academic achievement through the use of arts integration. **Arts Integration provides multiple alternative measures** to complete a whole child assessment, from performance assessments to observational data, to reflective practices demonstrated in conversations, discussions, and writing. Criteria and rubrics from our state's ARTS First Essential Toolkit will used, as well as collaborative development by the teachers"

This section of the application goes on to detail the Screening, Progress Monitoring, Data Collection and Analysis, and Reflection on Student Progress methodology for assessing student performance. Further, it details how assessments will be used to differentiate instruction, to identify students at risk, how it will use the Response to Intervention best practice, and the use of Data Team-Professional Learning Community Time to focus on data. Finally, this section of the application explains how Professional Development time will be used to evaluate school data and develop intervention strategies to personalize learning and develop differentiated instruction for students that are struggling. **Clearly, the Kamalani Team, along with its partners at Academica and Doral, has put substantial time and effort into developing measureable goals and the means to monitor the achievement of the school's students.**

From the above, it can be seen that it is simply inaccurate to state that there is not a clear and comprehensive plan for developing the Academic Plan.

Conclusion

In summary, the Kamalani Team strongly disagrees with the Evaluation Team's conclusion and recommendation for denial of a charter. Kamalani strongly believes that this school will, in fact, be a valuable addition to the Hawaii Public Charter School *ohana*.

Kamalani's Governing Board, Advisory Board, and Strategic Partners clearly possess the capacity to open and operate a successful charter school. Moreover, the proven performance of Academica and Doral Academy, Inc. will ensure the success of operations, finance, and academics. To ensure fiscal responsibility and success, Kamalani's budgets are conservative and realistic. Kamalani's Doral academic model of standards-aligned, arts integrated, and data driven instruction has a proven to be a highly successful one.

We request that the Application Committee approve Kamalani's application and that the Hawaii Public Charter School Commission grant us a charter.

Thank you for your consideration.

Exhibit C

Evaluation Team Rebuttal for Kamalani Academy

State Public Charter School Commission 2014 Evaluation Team Rebuttal to the Applicant Response

Charter Application for
Kamalani Academy

Evaluation Team
Team Lead: Danny Vasconcellos
Evaluators: Beth Bulgeron
Jeff Poentis
Kirsten Rogers
Kenneth Surratt
GG Weisenfeld

The Evaluation Team would like to express its appreciation for the hard work and effort that the Kamalani Academy ("Kamalani") applicant team has done throughout the charter application process, most recently in the applicant's response to the Evaluation Team's recommendation report. As such, the Evaluation Team would like to provide a few comments on the applicant's response.

The Final Application Recommendation Report (" Recommendation Report") concluded that the applicant failed to provide sufficient evidence that its key members possess the collective qualifications—including a demonstrated understanding of challenges, issues, and requirements associated with running a charter school—to implement the proposed school's Academic, Organizational, and Financial Plans. In the response, the applicant reiterated the qualifications and experience of its founding board members and advisory board members and stated that the Evaluation Team understated and limited the knowledge and experience of the listed members in the analysis. The Evaluation Team's analysis was not a critique of the applicant teams' extensive qualifications; rather the analysis is centered on how the applicant team used that collective knowledge and experience to prepare the charter application. In Kamalani's case, despite assembling a team with extensive credentials, the overall application was weak and deficient in many areas. As such, the applicant team failed to demonstrate the capacity to develop and open a successful charter school.

In both the Financial and Organizational sections of the Recommendation Report, the Evaluation Team determined that the significant weakness of the application was the lack of a complete, realistic, and viable start-up plan and start-up operating budget. In the response, the applicant confirmed the start-up budget consisted of $25,000 that would solely be used for marketing and recruitment. This response, along with a review of the information provided in the Request for Clarification ("RFC") regarding the start-up plan and budget, confirms the lack of a viable start-up plan as there are no plans or funds available for professional development for teachers. The start-up plan provided in the application mentioned that professional development opportunities would be voluntary and available prior to the school's start date.

In the Organizational Plan section of the response, the applicant reiterated information provided at the capacity interview regarding Academica's hiring of two full-time employees to provide the services during the start-up phase. Based on this information, the response suggested that the Evaluation Team erred in the conclusion that the applicant identified only a single member of the applicant team available on a full-time basis during the start-up phase. Throughout the application process, and explicitly stated during the capacity interview, Kamalani maintained that Academica was strictly a service provider and not a member of the applicant team. The Evaluation Team maintained this distinction and focused solely on the capacity and actions that would be taken by members of the applicant team. Kamalani's response served to reinforce the Evaluation Team's conclusion that almost all of the applicant team members themselves will not be available to perform start-up activities as it seems that the applicant is entirely dependent on Academica to perform most of these start-up activities.

In addition, the Evaluation Team is still concerned of Academica's role in the hiring process of the school principal. The applicant's response called on the Evaluation Team to explain how Academica's role limits a principal's ability to openly and honestly communicate. This concern was explained in the Recommendation Report as Academica's involvement in the hiring process includes identifying candidates and participating in interview. Despite this direct involvement in the selection of the principal, performance evaluations conducted by the governing board on both Academica and the school principal will include input by both parties on the other. As such, while not explicitly stated, there are concerns regarding the impartiality and possible conflict of interest that this situation could create.Another item in the response that the Evaluation Team would like to offer a rebuttal to is the Academic Plan section of the report. The applicant points out that the Initial Proposal noted that the applicant's met the minimum requirements yet in the final evaluation, the Evaluation Team concluded that the Academic Plan "Falls Far Below the Standard." While the applicant met the lower threshold in the initial proposal because they provided a skeleton curriculum development plan, when the final plan was submitted, the applicant failed to further describe or provide additional detail as to the curriculum development plan, and as such fell below the standard of review.

In the response, the applicant stated that the "affiliation with Doral Academy is a key partnership in the success of the curriculum development plan." As such, the applicant mentioned the successful results that Doral curriculum has had in schools in Florida and Nevada. However, throughout the application cycle, Kamalani has not been able to articulate this curriculum development plan. When asked how Doral curriculum would support learning outcomes in the RFC, the applicant provided a vague answer and provided an example of Doral curriculum but failed to answer the question of how the curriculum supports outcomes. The applicant seems to imply that Doral curriculum will be successful at Kamalani since it is has produced results in other states; however, the applicant has yet to provide a curriculum development plan that explains how the Doral curriculum will be adapted into Kamalani's curriculum and, more importantly, how Doral's curriculum will allow students to achieve the goals set by Kamalani.

In addition, the response disputed the Evaluation team's conclusion that the academic plan did not provide a clear plan to assess student progress. The applicant reiterated information from the application that stated Kamalani would use data from chosen assessments and that the arts integration approach provides multiple assessment measures. However, these responses demonstrate the overall weakness of the academic plan, and the application as a whole. The applicant only states that assessments have been chosen but fails to explain how these assessments will be used to determine whether the academic plan is successful. The applicant mentions an instructional approach, arts integration, and the alternative measures it provides, but fails to explain what these measures are and why these measures can demonstrate the benefits of an arts integration approach. As such, the Evaluation Team respectfully stands by the conclusion that the applicant failed to provide an academic plan that was comprehensive and clearly articulated.

New information not considered by the Evaluation Team

A portion of the applicant's response is new information that was not included in Kamalani's application. As such, this information in the response could not be holistically considered by the Evaluation Team. This includes information on the specific services Academica would provide during the start-up phase, the detailed contingency plan, and the chart detailing Doral Academy schools' accountability performance grades.

The Evaluation Team appreciates the effort and dedication the applicant has shown throughout the application process.

Exhibit D

Castle-Kahuku Complex Area Superintendent's Comments on Kamalani Academy

DAVID Y. IGE
GOVERNOR

KATHRYN S. MATAYOSHI
SUPERINTENDENT

LEA E. ALBERT
COMPLEX AREA SUPERINTENDENT

C. SUZANNE MULCAHY
COMPLEX AREA SUPERINTENDENT

STATE OF HAWAII
DEPARTMENT OF EDUCATION
WINDWARD OAHU DISTRICT
46-169 KAMEHAMEHA HIGHWAY
KANEOHE, HAWAII 96744

May 7, 2015

TO: Mr. Tom Hutton, Executive Director
State Public Charter School Commission

Lea E. Albert

FROM: Lea E. Albert, Castle/Kahuku Complex Area Superintendent

SUBJECT: Comments on Proposed Charter School Kamalani Academy

Thank you very much for the opportunity to provide honest feedback on this proposed charter school. My comments are as follows:

1. The proposal duplicates what the Castle Performing Arts Center Program already which is internationally famous and acclaimed, and impacts students in grades 3 to 12.
2. This duplicates Castle High School's acclaimed Dance Force which focuses on all manner of dance including, but not limited to ballet, tap, jazz and modern dance.
3. This duplicates Kahuku's choral program and show choir which is the best in the state.
4. We already integrate the arts as a vehicle for interdisciplinary project based learning opportunities for our students and provide additional opportunities for students who are gifted artists in any medium from film to graphics to watercolors.
5. The quality of future contributions to the Public Education System is not determined. We already had a lab school that was supposed to contribute to the public school system and I cannot think of any contributions this lab school ever made. We already have experts who can help other schools as well as charter schools on the arts.
6. This is not an original, unique or inspiring write up.
7. There is no confirmed site.
8. There is concern regarding budget for Kamalani. Programs such as those I have mentioned receive and require additional funding. They are <u>very</u> expensive.
9. If I were to tap into the expertise in a charter school to aid our schools, it would be to those culture-based Hawaiian or Hawaiian Language Immersion Charter Schools.

Thank You.

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