

DAVID Y. IGE  
GOVERNOR



JOHN S. S. KIM  
CHAIRPERSON

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

1111 Bishop Street, Suite 516, Honolulu, Hawaii 96813  
Tel: (808) 586-3775 Fax: (808) 586-3776

**RECOMMENDATION SUBMITTAL**

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DATE OF SUBMITTAL: January 18, 2019

DATE OF MEETING: January 24, 2019

TO: John Kim, Chairperson  
State Public Charter School Commission

FROM: Sione Thompson, Executive Director  
State Public Charter School Commission

AGENDA ITEM: III. Presentation/Action on Intervention Protocol for Nā Wai Ola Public Charter School’s Notice of Concern Regarding Public Charter School Contract Violations

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I. DESCRIPTION

Presentation and action on intervention protocol for Notice of Concern #1819AFO01 for Nā Wai Ola Public Charter School.

II. POLICY CONTEXT AND AUTHORITY

Pursuant to Hawaii Revised Statutes (“HRS”) §302D-17(a), “An authorizer shall continually monitor the performance and legal compliance of the public charter school it oversees, including collecting and analyzing data to support ongoing evaluation according to the charter contract. Every authorizer shall have the authority to conduct or require oversight activities that enable the authorizer to fulfill its responsibilities under this chapter, including conducting appropriate inquiries and investigations, so long as those activities are consistent with the intent of this chapter and adhere to the terms of the charter contract.”

III. BACKGROUND

Pursuant to Exhibit D, Intervention Protocol of the charter contract, Nā Wai Ola Public Charter

School was issued a Notice of Concern on December 3, 2018 as a result of its 2017-2018 performance report and the school year 2018-2019 Site Visit (**Exhibit 1**). A response to the NOC was due to the Commission by 4:30 PM on December 17, 2018. The school submitted its response to the NOC on December 17, 2018 (**Exhibit 5**).

After reviewing the school's response to the NOC, Commission staff determined that the governing board did not address all areas of concern. On January 4, 2019 the Commission sent a letter to the school requesting that the school submit the additional information by January 11, 2019 (**Exhibit 4**). Na Wai Ola's response is attached as **Exhibit 6**.

According to the Intervention Protocol, the school's governing board is required to provide "a written response to the Commission within 14 calendar days and the response must include at least one of the following:

- 1) a description of the remedy of the compliance breach, if the breach has been completely remedied, including evidence of such remedy;
- 2) a written notification disputing the determination that a compliance breach has occurred with accompanying evidence in support of that assertion;
- 3) a Corrective Action Plan designed to remedy the compliance breach that includes timelines and persons responsible for each action within the plan. If the submitted Corrective Action Plan is not mutually agreeable to both the school and the Commission staff, the matter will be brought to the Commission at a General Business Meeting."

#### **Site Visit Report**

Commission staff conducted a site visit at the Na Wai Ola campus to monitor the academic performance framework, financial performance framework and organizational performance framework sections of the charter contract. The organizational and financial performance review was conducted on October 18, 2018, and an academic review was conducted on November 1, 2018. A notice of concern was issued for non-compliance with the academic performance framework (Section 4.2), the financial performance framework (Section 6.1, 6.3 and 6.4), and the organizational performance framework (Section 7.3, 8.8, 8.9, 12.3, and 12.7). See **Exhibit 2** for the site visit report.

#### **Performance Report**

The Na Wai Ola performance report for School Year 2017-2018 showed that the school did not meet all of its performance targets across the academic, financial and organizational performance frameworks. For the academic performance framework, the school exceeded its targets for academic proficiency, academic growth and the achievement gap. It did not meet its target for chronic absenteeism. For the financial performance framework, the school was given a risk assessment rating of "acceptable." For the organizational performance framework, the school did not submit its statement of assurances form. See **Exhibit 3** for the SY 2017-2018 performance report.

#### **IV. INFORMATION FOR CONSIDERATION/RECOMMENDATION**

Commission staff has reviewed the school's response to the NOC. Details are included in the tables below.

**Performance Framework Results for School Year 2017-2018**

Area of Concern	NOC Response #1 from School submitted 12/17/18	NOC Response #2 from School submitted 01/10/19	Status	Comments
<b>Academic Performance Framework</b>				
College and Career Readiness: Chronic Absenteeism	None – this was not addressed in the school’s written response	Corrective action plan	Not resolved	<ul style="list-style-type: none"> <li>The school submitted its Title I Schoolwide Plan as its corrective action plan for this area of concern. The Schoolwide Plan includes the following desired outcome related to chronic absenteeism: “[By the end of school year 2019-2020,] Nā Wai Ola’s chronic absenteeism rate will be at, or below, the statewide average”(Nā Wai Ola Public Charter School Title I Schoolwide Plan, page 6).</li> </ul> <p>The implementation timeline extends beyond June 30, 2019, when the school’s current Charter Contract expires, and the desired outcome does not align with the chronic absenteeism performance target in the school’s the Academic Performance Framework for school year 2018-2019, which is a fixed range (22%-31%); therefore, it is not an acceptable corrective action.</p>
<b>Organizational Performance Framework</b>				
Statement of Assurances	None – this was not addressed in the school’s written response, however the compliance issue has been remedied via a submittal to the Epicenter system.	<i>No additional information is required, item is closed</i>	Resolved	

**Site Visit Report Issued on November 30, 2018**

Area of Concern	NOC Response #1 from School submitted 12/17/18	NOC Response #2 from School submitted 01/10/19	Status	Comments
<b>Academic Performance Framework</b>				
<p>Section 4.2 The material elements of the School's Educational Program, including but not limited to the School's mission and vision statements, are as set forth in <u>Exhibit A</u> to this Charter Contract. The School shall, at all times, operate in a manner consistent with its Educational Program as defined in <u>Exhibit A</u>. Revisions to any of the elements in <u>Exhibit A</u> (such as establishing, creating, or expanding a virtual or blended learning programs or expanding or eliminating a division) shall be considered a material change to the Charter Contract and shall require prior written approval by the Commission. Where appropriate, this approval shall be informed by an analysis of the School's performance on the Performance Frameworks under Section 5.1 of this Charter Contract particularly to the</p>	<p>Corrective action plan for:</p> <ul style="list-style-type: none"> <li>● Mission and Vision</li> </ul> <p>Not addressed:</p> <ul style="list-style-type: none"> <li>● Essential Term #2</li> <li>● Essential Term #3</li> </ul>	<p>Corrective action plan for:</p> <ul style="list-style-type: none"> <li>● Essential Term #2</li> <li>● Essential Term #3</li> </ul>	<p>Resolved</p>	<ul style="list-style-type: none"> <li>● The school submitted revised versions of its Essential Terms #2 and #3 as part of the school's contract renewal application.</li> </ul>

Area of Concern	NOC Response #1 from School submitted 12/17/18	NOC Response #2 from School submitted 01/10/19	Status	Comments
<p>extent that such changes are intended to improve educational outcomes.</p> <p>Specific sections:</p> <ul style="list-style-type: none"> <li>● Mission and Vision</li> <li>● Essential Term #2</li> <li>● Essential Term #3</li> </ul>				

<b>Financial Performance Framework</b>				
<p>Section 6.1 The School shall maintain accurate and comprehensive financial records, practice governmental accounting in accordance with Generally Accepted Accounting</p>	<p>NWO has retroactively gained approval for any transactions that fell outside of the school's existing policies. The School Interim Business Manager incorrectly reported that NWO had multiple Debit Cards. The only card in existence is</p>	<p>Additional information and approval documentation was provided by the School Governing Board 1/4/19 including bank statements and purchase</p>	<p>Not Resolved</p>	<ul style="list-style-type: none"> <li>● Fiscal irregularities were discovered in review of the documents provided that raise additional concerns of fiscal management and adherence to procurement policies in place currently at the school.</li> </ul>

Area of Concern	NOC Response #1 from School submitted 12/17/18	NOC Response #2 from School submitted 01/10/19	Status	Comments
<p>Principles, and use public funds in a fiscally responsible manner. (Attachment 2 pp. 35,37)</p>	<p>carried by the schools Director (Jason Wong). A copy of NWO's Fiscal policies and procedures were provided to the Interim Business Manager.</p>	<p>requisitions for retroactive procurement approval.</p>		<ul style="list-style-type: none"> <li>The school has contracted an external fiscal services provider to handle their business management in accordance with the school adopted policies and procedures of fiscal management and in alignment to the Charter Contract as a corrective action going forward..</li> </ul>
<p>Section 6.3 Pursuant to Sections 302D-25(b) and 302D-12(d), HRS, the School and its Governing Board shall be exempt from Chapter 103D, HRS. However, the School's Governing Board shall develop and adhere to a policy for the procurement of goods, services, and construction consistent with the goals of public accountability and public procurement practices. The policy shall be readily accessible from the School's website. (Attachment 2 pp. 35,37)</p>	<p>NWO has retroactively gained approval for any transactions that fell outside of the school's existing policies. The School Interim Business Manager incorrectly reported that NWO had multiple Debit Cards. The only card in existence is carried by the schools Director (Jason Wong). A copy of NWO's Fiscal policies and procedures were provided to the Interim Business Manager.</p>	<p>Additional information and approval documentation was provided by the School Governing Board 1/4/19 including bank statements and purchase requisitions for retroactive procurement approval.</p>	<p>Not Resolved</p>	<ul style="list-style-type: none"> <li>Fiscal irregularities were discovered in review of the documents provided that raise additional concerns of fiscal management and adherence to procurement policies in place currently at the school.</li> <li>The school has contracted an external fiscal services provider to handle their business management in accordance with the school policies and procedures of fiscal management and in alignment to the Charter Contract as a corrective action going forward..</li> </ul>

Area of Concern	NOC Response #1 from School submitted 12/17/18	NOC Response #2 from School submitted 01/10/19	Status	Comments
<p>Section 6.4 The School's Governing Board shall develop and adhere to a policy for the School's financial management that shall be readily accessible from the School's website, as described in Section 8.9. This policy shall allow the School to maintain appropriate governance and management procedures and financial controls which shall include, but not be limited to:</p> <p>a. Budgets; b. Accounting policies and procedures; c. Payroll procedures; d. Financial reporting; and e. Internal control procedures for receipts, disbursements, purchases, payroll, inventory, and fixed assets. (Attachment 2 p. 38)</p>	<p>Fiscal Policies and Procedures have been reviewed with Interim Business Manager and are being observed.</p>	<p>Additional information and approval documentation was provided by the School Governing Board 1/4/19 including bank statements and purchase requisitions for retroactive procurement approval.</p>	<p>Not Resolved</p>	<ul style="list-style-type: none"> <li>● Fiscal irregularities were discovered in review of the documents provided that raise additional concerns of fiscal management and adherence to procurement policies in place currently at the school.</li> <li>● The school has contracted an external fiscal services provider to handle their business management in accordance with the school policies and procedures of fiscal management and in alignment to the Charter Contract as a corrective action going forward..</li> </ul>
<p><b>Organizational Performance Framework</b></p>				

Area of Concern	NOC Response #1 from School submitted 12/17/18	NOC Response #2 from School submitted 01/10/19	Status	Comments
<p>Section 7.3 The school shall comply with its admission policies and procedures as approved by the Commission and these policies and procedures shall be readily accessible from the School’s website, as described in Section 8.9 of this Charter Contract.</p> <p>and</p> <p>Section 8.9 The School shall make the current versions of the following policies and procedures readily accessible from its website:</p> <p>a. Admissions policies and procedures, as described in Section 7.3 of this Charter Contract.</p>	<p>The school responded “Jason Wong is currently in the process of ensuring that NWO’s Admissions Policy is approved by the Charter School Commission, and will submit a proposal for approval by December 21, 2018. Our Non-approved Admissions Policy will be removed by December 19, 2018.”</p>	<p>The school responded “Attached is NWO’s Admission’s Policy as well as a letter to the Charter School Commission asking for review and approval.”</p>	<p>Not resolved</p>	<p>Na Wai Ola continues to be out of compliance with Section 7.3 of the Charter Contract. As of 1/17/2019 the school’s admissions policy was still not accessible from, the school’s Policies and Procedures page on its website:  <a href="https://nawaiolapcs.org/ohana/policies-procedures/">https://nawaiolapcs.org/ohana/policies-procedures/</a>  nor the school’s Admissions Info webpage:  <a href="https://nawaiolapcs.org/about/admissions-info/">https://nawaiolapcs.org/about/admissions-info/</a></p> <p>Continuing issues:</p> <ul style="list-style-type: none"> <li>• The requirement per the charter contract is that schools shall comply with the approved admission policy and procedures, and make these available on their website. This is still the requirement even while the school requests approval for policy changes.</li> <li>• The school did not provide evidence that it has addressed the compliance requirements of Section 7.3 and 8.9 of the Charter Contract.</li> <li>• This is an ongoing compliance issue for the school. In the SY15-16 Site Visit report to Na Wai Ola School, dated July 25, 2016, the school was asked to “ follow-up” within 15 calendar days to</li> </ul>



Area of Concern	NOC Response #1 from School submitted 12/17/18	NOC Response #2 from School submitted 01/10/19	Status	Comments
				<p>“Remove any postings of the unapproved policy and post the school’s Commission-approved Admissions Policy.”</p>
<p>Section 8.8 The School may provide its own transportation services, provide transportation through an agreement or contract with a private provider, or access any other school transportation provided to it by law. Pursuant to Section 286-181, HRS, any transportation services provided by the School shall follow the safety rules and standards relating to school vehicles, equipment, and drivers adopted by the Department of Transportation.</p>	<p>School responded “Jason Wong is currently in the process of ensuring transportation services meet the necessary requirements. These will be met January 31, 2019.”</p>	<p>School responded “Attached is a Corrective Action Plan to bring Na Wai Ola’s transportation into compliance.”</p>	<p>Resolved</p>	<p>The school did not provide the required description of their Corrective Action Plan. Rather the school submitted a table, called Driver Qualifications, which includes columns “Requirements” and “Target Dates” and documents related to the school’s bus driver. Despite the school’s omission of an explanation of a plan and each action to bring the school into compliance, the table appears to be addressing that their school is missing key components of a Driver Qualifications folder, which is required by the Department of Transportation.  </p>

Area of Concern	NOC Response #1 from School submitted 12/17/18	NOC Response #2 from School submitted 01/10/19	Status	Comments
<p>Section 12.3 Pursuant to Section 302A-804, HRS, the School shall hire licensed teachers that meet the applicable State licensing requirements consistent with federal law and requirements, State law, and collective bargaining agreements, as such requirements may be amended.</p>	<p>The School responded "Inactive Licenses have been resolved"</p>	<p>The school responded "Inactive Licenses have been resolved. Attached are the HSTB search results for Ashley Malama-Poplardo, Carrie Soo Hoo, Bonnie Stebbins, Shane Sigetic, and Richard Gramlich.</p>	<p>Not resolved</p>	<p>Although the school did submit documentation that appear to show that its teachers are now licensed, the school did not address the requirement that charter schools shall hire licensed teachers.</p> <p>Continuing issues:</p> <ul style="list-style-type: none"> <li>● In the report of the October 2018 site visit, the school was asked to follow-up by amending its hiring process so only licensed candidates, or those with an Emergency Hire permit, are hired and that background checks should also be conducted before the individual begins work at the school. The school did not provide its remedy to ensure the Na Wai Ola shall hire only licensed teachers.</li> <li>● In November 2018 review of Na Wai Ola school, HTSB was asked whether there were any findings of non-compliance. HTSB reported that Nā Wai Ola had two teachers that do not have active licenses. In the NOC letter the school was asked to submit any correspondence from HTSB that the teachers are now cleared with HTSB. The school did</li> </ul>

Area of Concern	NOC Response #1 from School submitted 12/17/18	NOC Response #2 from School submitted 01/10/19	Status	Comments
				<p>not provide any correspondence from HTSB indicating that they are now in good standing.</p> <ul style="list-style-type: none"> <li>The school provided what appears to be screen shots of the HTSB website as evidence that the school's teachers are licensed. During the October 2018 review with school staff, the school appeared to have hiring practices that seemed to allow the school to offer teaching positions even if the individual didn't have a teaching license that is consistent with State law and collective bargaining agreements. The school did not provide a description or explanation of how its submittal remedies the compliance issue that the school may continue to hire individuals to teach who may not have teaching license at the time they are hired.</li> </ul>
<p>Section 12.7 The School shall conduct criminal history checks, administered by the Hawaii Criminal Justice Data Center in accordance with Section 846-2.7, HRS, solely for the</p>	<p>School responded "NWO has conducted criminal history checks and has access to the results"</p>	<p>School responded "NWO has conducted criminal history checks and has access to the results. Attached are the results for Starr Pascual, John Livsey, Carrie Soo</p>	<p>Not resolved</p>	<p>The school submitted evidence that criminal history checks have been conducted for a random selection of employees, as requested in the NOC letter.</p> <p>Continuing issue:</p>

Area of Concern	NOC Response #1 from School submitted 12/17/18	NOC Response #2 from School submitted 01/10/19	Status	Comments
<p>purpose of determining whether a prospective employee or agent is suitable for working in close proximity to children. All such decisions shall be subject to applicable federal laws and regulations currently or hereafter in effect. The School may terminate the employment of any employee or deny employment to an applicant if the person has been convicted of a crime, and if the School finds by reason of the nature and circumstances of the crime that the person poses a risk to the health, safety, or well-being of children.</p>		<p>Hoo, Ha'aheo Kaohi, Bonnie Stebbins, and James Nolen.”</p>		<ul style="list-style-type: none"> <li>● Although the school has provided evidence it has conducted the required criminal history checks, some of the dates on the submitted evidence indicate that background checks could be conducted as long as 7 months after the hire date. There continues to be a concern with the school’s procedures that allow individuals to begin working at the school before the school has determined their suitability for working in close proximity to children.</li> <li>● This is an ongoing compliance issue for the school. In the SY15-16 Site Visit report to Na Wai Ola School, dated July 25, 2016, a “School follow-up” item was “Within 60 calendar days <ul style="list-style-type: none"> <li>● School will contact the Hawaii Criminal Justice Data Center for information on the process to utilize their services.</li> <li>● School will write a letter of request to the Hawaii Criminal Justice Data to establish a User Agreement for fingerprint-based, state and national, criminal history record checks.”</li> </ul> </li> </ul>

Area of Concern	NOC Response #1 from School submitted 12/17/18	NOC Response #2 from School submitted 01/10/19	Status	Comments
				<p>Before Commission monitoring began, schools were provided opportunities to prepare for the statutory and contractual requirement to conduct criminal history checks:</p> <ul style="list-style-type: none"> <li>● At the Public Charter School Commission Education Summit, held June 13-14, 2016, for charter schools, HCJDC presented a break-out session.</li> <li>● On September 20, 2017 a reminder email was sent to all schools about the upcoming date, October 31, 2017, when charter schools would be expected to conduct employee fingerprinting and background checks through HCJDC going forward.</li> </ul>

**Exhibit 1**  
**Nā Wai Ola Public Charter School**  
**Notice of Concern**

DAVID Y. IGE  
GOVERNOR



JOHN S.S. KIM  
CHAIRPERSON

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

<http://CharterCommission.Hawaii.Gov>  
1111 Bishop Street, Suite 516, Honolulu, Hawaii 96813  
Tel: (808) 586-3775 Fax: (808) 586-3776

December 03, 2018

VIA EMAIL: [mpostler@nawaiolapcs.org](mailto:mpostler@nawaiolapcs.org)

Melissa Postler  
Governing Board Chair  
Na Wai Ola Public Charter School  
P.O. Box 711539  
Mountain View, Hawaii 96771

RE: NOC #1819AFO01 – School Year 2017-2018 Framework Results and School Year 2018-2019 Site Visit

Dear Melissa Postler:

This letter serves as a Notice of Concern (“Notice”), as described in the Intervention Protocol, Exhibit D (“Intervention Protocol”), of the State Public Charter School Contract (“Charter Contract”).

**Performance Framework Results for School Year 2017-2018**

Section 5.1 The School's academic, organizational, and financial performance under this Charter Contract shall be evaluated using the Academic, Organizational, and Financial Performance Frameworks, respectively, attached as Exhibit B to this Charter Contract. The specific terms, forms, and requirements of the Performance Frameworks, including any required indicators, measures, metrics, and targets, are maintained and disseminated by the Commission and shall be binding on the School. Material changes to the Performance Frameworks shall require approval by the Commission.

The school did not meet the following performance requirements:

- I. Academic Performance Framework:
  - College and Career Readiness: Chronic Absenteeism
- II. Financial Performance Framework:
  - N/A
- III. Organizational Performance Framework:
  - Statement of Assurances

For more details, see the Individual School Report for Na Wai Ola Public Charter School, School Year: 2017-2018 (Attachment 1).

**Site Visit Report Issued on November 30, 2018**

Non-compliance with the following sections of the Charter Contract, based on the contract monitoring site visits conducted at the school on [date(s) of visits from site visit reports]:

I. Academic Performance Framework:

- **Section 4.2** The material elements of the School's Educational Program, including but not limited to the School's mission and vision statements, are as set forth in Exhibit A to this Charter Contract. The School shall, at all times, operate in a manner consistent with its Educational Program as defined in Exhibit A. Revisions to any of the elements in Exhibit A (such as establishing, creating, or expanding a virtual or blended learning programs or expanding or eliminating a division) shall be considered a material change to the Charter Contract and shall require prior written approval by the Commission. Where appropriate, this approval shall be informed by an analysis of the School's performance on the Performance Frameworks under Section 5.1 of this Charter Contract particularly to the extent that such changes are intended to improve educational outcomes. (Attachment 2 pp. 41,43)

II. Financial Performance Framework:

- **Section 6.1** The School shall maintain accurate and comprehensive financial records, practice governmental accounting in accordance with Generally Accepted Accounting Principles, and use public funds in a fiscally responsible manner. (Attachment 2 pp. 35,37)
- **Section 6.3** Pursuant to Sections 302D-25(b) and 302D-12(d), HRS, the School and its Governing Board shall be exempt from Chapter 103D, HRS. However, the School's Governing Board shall develop and adhere to a policy for the procurement of goods, services, and construction consistent with the goals of public accountability and public procurement practices. The policy shall be readily accessible from the School's website. (Attachment 2 pp. 35,37)
- **Section 6.4** The School's Governing Board shall develop and adhere to a policy for the School's financial management that shall be readily accessible from the School's website, as described in Section 8.9. This policy shall allow the School to maintain appropriate governance and management procedures and financial controls which shall include, but not be limited to: a. Budgets; b. Accounting policies and procedures; c. Payroll procedures; d. Financial reporting; and e. Internal control procedures for receipts, disbursements, purchases, payroll, inventory, and fixed assets. (Attachment 2 p. 38)



III. Organizational Performance Framework:

- **Section 7.3** The school shall comply with its admission policies and procedures as approved by the Commission and these policies and procedures shall be readily accessible from the School's website, as described in Section 8.9 of this Charter Contract. (Attachment 2 pp. 30,32)
- **Section 8.8** The School may provide its own transportation services, provide transportation through an agreement or contract with a private provider, or access any other school transportation provided to it by law. Pursuant to Section 286-181, HRS, any transportation services provided by the School shall follow the safety rules and standards relating to school vehicles, equipment, and drivers adopted by the Department of Transportation. (Attachment 2 p. 22)
- **Section 8.9** The School shall make the current versions of the following policies and procedures readily accessible from its website:
  - a. **Admissions policies and procedures**, as described in Section 7.3 of this Charter Contract. (Attachment 2 pp. 30,32)
- **Section 12.3** Pursuant to Section 302A-804, HRS, the School shall hire licensed teachers that meet the applicable State licensing requirements consistent with federal law and requirements, State law, and collective bargaining agreements, as such requirements may be amended. (Attachment 2 p. 25)
- **Section 12.7** The School shall conduct criminal history checks, administered by the Hawaii Criminal Justice Data Center in accordance with Section 846-2.7, HRS, solely for the purpose of determining whether a prospective employee or agent is suitable for working in close proximity to children. All such decisions shall be subject to applicable federal laws and regulations currently or hereafter in effect. The School may terminate the employment of any employee or deny employment to an applicant if the person has been convicted of a crime, and if the School finds by reason of the nature and circumstances of the crime that the person poses a risk to the health, safety, or well-being of children. (Attachment 2 pp. 3-4)

For more details, see the Site Visit Report for Na Wai Ola Public Charter School, School Year: 2018-2019 (Attachment 2).

**Response Process**

As specified by the Intervention Protocol, a school governing board must provide a written response to the Commission within 14 calendar days of the date of a Notice. Please select the appropriate option from the list below and submit the required documents to [frameworks.compliance@spcsc.hawaii.gov](mailto:frameworks.compliance@spcsc.hawaii.gov) by **4:30 p.m. on December 17, 2018.**

*Note: The response must include a completed Response to Notice of Concern Form that has been signed by the school governing board chair. A scanned copy or photo of the original signed form is preferred; if this is not possible, the Commission will accept an electronically signed copy (i.e., the school governing board chair's name typed in the signature field) **from the school governing board chair's email account.***

Option 1: If the issues of concern were completely remedied by the response deadline, please submit:

- A completed Response to Notice of Concern Form (check Option 1) that includes:
  - A description of the remedy (*e.g.*, school staff uploaded the required documents to Epicenter)

Option 2: If the issues of concern were not completely remedied by the response deadline, but the remedy is currently in progress, please submit:

- A completed Response to Notice of Concern Form (check Option 2) that includes:
  - A description of the a corrective action plan designed to remedy the issues of concern
  - A timeline and deadline for each action within the plan
  - The person(s) responsible for each action within the plan

Option 3: If the school governing board would like to dispute the issue of concern, please submit:

- A completed Response to Notice of Concern Form (check Option 3) that includes:
  - A description of the dispute with the issues of concern
  - Evidence supporting the school governing board's disagreement with the issues

Please be aware that issues of concern will be escalated to the Commission for consideration at a general business meeting if the school governing board ***fails*** to do any of the following:

- Respond to the Notice by the deadline using one of the options listed above.
- Submit a corrective action plan that is mutually agreeable to both the school governing board and Commission staff.
- Make progress toward remedying the issue of concern according to the accepted corrective action plan.

Any questions regarding this Notice may be directed to Commission staff as follows:

Academic Performance Framework:

Jennifer Higaki, Academic Performance and Data Systems Manager

[jennifer.higaki@spcsc.hawaii.gov](mailto:jennifer.higaki@spcsc.hawaii.gov)

(808) 586-3882

Financial Performance Framework:

Scott Hall, Financial Performance Officer

[scott.hall@spcsc.hawaii.gov](mailto:scott.hall@spcsc.hawaii.gov)

(808) 586-3538

Organizational Performance Framework:

Sylvia Silva, Organizational Performance Officer

[sylvia.silva2@spcsc.hawaii.gov](mailto:sylvia.silva2@spcsc.hawaii.gov)

(808) 586-3781

Melissa Postler, Governing Board Chair

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December 03, 2018

For more details about the Notice of Concern process, please refer to the Intervention Protocol in the Charter Contract.

Thank you very much for your attention to this matter. We look forward to the speedy resolution of this Notice and will notify you via email once it has been satisfactorily resolved.

Best regards,

A handwritten signature in black ink, appearing to read "Sione Thompson". The signature is fluid and cursive, with a long horizontal stroke at the end.

Sione Thompson  
Executive Director

Attachment 1: Individual School Report for Na Wai Ola Public Charter School, School Year: 2017-2018

Attachment 2: Site Visit Report for Na Wai Ola Public Charter School, School Year: 2018-2019

Attachment 3: Response to Notice of Concern Form

cc: Jason Wong, School Director, Na Wai Ola Public Charter School (via email: [jwong@nawaiolapcs.org](mailto:jwong@nawaiolapcs.org))

**Exhibit 2**  
**Nā Wai Ola Public Charter School**  
**Site Visit Report**



**State Public Charter School Commission**  
**Site Visit Report for Nā Wai Ola Public Charter School**  
**School Year: 2018-2019**

**Issued on November 30, 2018**

Site Visit Report for: Nā Wai Ola Public Charter School  
School Year: 2018-2019

**Organizational Performance Review**

Date of site visit	October 18, 2018
Nā Wai Ola Participants	<ul style="list-style-type: none"> <li>• Jason Wong, Director</li> <li>• Kapua Francisco, Office Manager</li> <li>• Lore-Lin Makaiwi, Dean of Students</li> <li>• Starr Pascual, Office Clerk</li> <li>• Steve Porter, Facilities Manager</li> </ul>

**Financial Performance Review**

Date of site visit	October 18, 2018
Nā Wai Ola Participants	<ul style="list-style-type: none"> <li>• Jason Wong, Director</li> <li>• Maggie Mason, Interim Business Manager</li> </ul>

**Academic Performance Review**

Date of site visit	November 1, 2018
Nā Wai Ola Participants	<ul style="list-style-type: none"> <li>• Jason Wong, Director</li> <li>• Lore-Lin Makaiwi, Dean of Students</li> </ul>

### Organizational Performance Review

Compliance review subject	Yes/No	Evidence	Concerns	Comments
<b>PERSONNEL - SITE REVIEW</b>				
<p>The charter school is able to produce on-site documentation that HCJDC background checks were conducted on all hires since July 1, 2017 a</p>	<p>No</p>	<ul style="list-style-type: none"> <li>• During the review there was a finding that a recent hire is working at the school and the school did not conduct a background check. It was observed that the job position does interact with students or works in close proximity to students.</li> <li>• The school reported that the Business Manager manages employee background checks. This individual is on an extended leave so there isn't a person trained by the Hawaii Criminal Justice Data Center currently at the school. The school's Principal is in the process of getting trained.</li> <li>• The school reported that they do have procedures in place and did provide their binder for conducting background checks. The school does not have a policy or procedures in place regarding what the school should/would do when there is a finding during a background check. The school reported judging findings on the report, to</li> </ul>	<p>Section 12.7 states The School shall conduct criminal history checks, administered by the Hawaii Criminal Justice Data Center in accordance with Section 846-2.7, HRS, solely for the purpose of determining whether a prospective employee or agent is suitable for working in close proximity to children. All such decisions shall be subject to applicable federal laws and regulations currently or hereafter in effect. The School may terminate the employment of any employee or deny employment to an applicant if the person has been convicted of a crime, and if the School finds by reason of the nature and circumstances of the crime that the person poses a risk to the health, safety, or well-being of children.</p>	<p><b>Notice of Concern:</b> Issued for non-compliance with Section 12.7 of the Charter Contract.</p>

Compliance review subject	Yes/No	Evidence	Concerns	Comments
		<p>determine whether or not to hire a candidate, is a "gray" area.</p> <ul style="list-style-type: none"> <li>• The school shared they would be interested in purchasing these services from DOE or cost sharing personnel services with another charter school.</li> </ul>		
<p>The charter school has established policies and procedures that meet Section 9.4 of the Charter Contract for reporting incidents, which include the disciplinary actions for failing to reports these incidents</p>	No	<ul style="list-style-type: none"> <li>• The school reported that the Dean of Students conducts training on mandated reporting.</li> <li>• The school reported that the School Principal maintains the sign-in sheets from the trainings, however due to time, these were not reviewed during the site review.</li> <li>• Asking an employee, they indicated they "had some training" on this.</li> </ul>	<p>When asking an employee, there was not confidence that the employee was aware of the procedures and requirements for reporting incidents, or the disciplinary actions that may be applicable to them if they failed to make a report.</p>	<p><b>School follow-up:</b> Include this policy in faculty and staff trainings, including trainings with new hires who may have missed the annual training.</p>
<p>The charter school has records that indicate it has trained all employees regarding:</p> <ul style="list-style-type: none"> <li>• blood borne pathogens</li> <li>• child abuse reporting</li> <li>• sexual harassment</li> <li>• policies and procedures for reporting Crime-related incidents</li> </ul>	No	<ul style="list-style-type: none"> <li>• School reported that it conducts training on some of these items but not all, for example, not on sexual harassment.</li> <li>• Policies are not readily accessible, for instance in the school's office. Some of the school's policies can be found on the school's website. School reported they provide staff with a handbook.</li> <li>• School reported that trainings conducted at the beginning of year involve teachers and EA</li> </ul>	<p>School has not provided training on all policies including those that could affect employment and/or required reporting regarding students. School does not provide training for all of its faculty/staff and cannot assure that all employees are aware of required procedures, expectations, and requirements.</p>	<p><b>School follow-up:</b> Include all school policies related to students and employment in faculty and staff trainings. Conduct training with all faculty and all staff. Conduct training on policies with new hires who may have missed an earlier training.</p>



Compliance review subject	Yes/No	Evidence	Concerns	Comments
		<p>positions but not other positions. They reported that they do trainings throughout the year also.</p> <ul style="list-style-type: none"> <li>The school reported that the School Principal maintains the sign-in sheets from trainings, however due to time, these were not reviewed during the site review.</li> </ul>		
<p>Teachers have the credentials and licenses required to comply with the state Every Student Succeeds Act (ESSA), and HTSB requirements (random selection)</p>	<p>No</p>	<ul style="list-style-type: none"> <li>The school reported the School Principal is responsible for verifying through Hawaii Teachers Standards Board (HTSB) website that the candidate has a teaching license.</li> <li>At the point of hiring the school is informed on the status of the teaching license. 01</li> <li>The school has a hiring committee who interviews candidates for vacant positions. The person with the highest score is offered the job. Not having a license does not preclude the committee from offering the teaching position.</li> <li>School reported that "right to know" letters are sent to families notifying them that they may ask for certain information about their</li> </ul>	<p>Section 12.3 states: Pursuant to Section 302A-804, HRS, the School shall hire licensed teachers that meet the applicable State licensing requirements consistent with federal law and requirements, State law, and collective bargaining agreements, as such requirements may be amended.</p>	<p><b>School follow-up:</b> Amend the hiring process so only licensed candidates, or those with an Emergency Hire permit, are hired. Background checks should also be conducted before the individual begins work at the school.</p>

Compliance review subject	Yes/No	Evidence	Concerns	Comments
		<p>student's teacher's qualifications.</p> <ul style="list-style-type: none"> <li>School reported that if a teacher is teaching out field, the School Principal monitors the individual's progress towards that license.</li> </ul>		
(If applicable) If the charter school has been audited by the Hawaii Criminal Justice Data Center (HCJDC) there were no significant findings	N/A			
If there were findings, the school was able to produce its corrective action plan or to provide evidence that the findings have been corrected	N/A			
The charter school has not received a notification letter of concern, or any other official communication regarding concerns, from the Hawaii Teachers Standards Board (HTSB)	Yes	The school reported it has never received a notification of non-compliance from HTSB.		
If no, the school is able to produce its corrective action plan or to provide evidence that the findings have been corrected	N/A			
<b>HEALTH AND SAFETY - SITE REVIEW</b>				
Has the charter school's facilities been modified during the past year?	No	School reported it has not modified its facilities in the past year.		

Compliance review subject	Yes/No	Evidence	Concerns	Comments
If yes and construction is ongoing:	N/A			
The school was able to produce the applicable state and county permits for modification	N/A			
If yes and construction is completed:	N/A			
The school was able to produce 1) a Certificate of Occupancy for the building and also 2) the same certificate is posted	N/A			
The charter school's facilities are adequate for the number of students assigned to each site	Unable to determine	<ul style="list-style-type: none"> <li>• There was a walk-through of the facilities with the school's facility manager, specifically the classrooms in the "blue classroom building".</li> <li>• There is an individual in charge of facilities. The employee stated the school is aware of occupant load capacity of the classrooms. He reported that he works together with the school's administration to ensure limits are not exceeded.</li> <li>• There was a copy of the Certificate of Occupancy posted on the school's "blue classroom building".</li> </ul>	Without posted occupant load signs, it is unclear how the school can be sure of the safe occupant load for the rooms in the "blue classroom building".	<b>School follow-up:</b> Request occupant load signs for the buildings/rooms be posted. School should provide to the Commission a copy of its letter as well as any response.

Compliance review subject	Yes/No	Evidence	Concerns	Comments
		<ul style="list-style-type: none"> <li>The observed classrooms did not have occupant load signs posted.</li> </ul>		
<u>Random sampling:</u>				
What is the occupancy limit for the building?		<ul style="list-style-type: none"> <li>The observed classrooms did not have occupant load signs posted.</li> <li>There is an individual in charge of facilities. The employee stated the school is aware of occupant load capacity of the classrooms. He reported that he works together with the school's administration to ensure limits are not exceeded.</li> </ul>	See above	See above
How many students are served at one time in that building?		<ul style="list-style-type: none"> <li>The observed classrooms did not have occupant load signs posted.</li> <li>There is an individual in charge of facilities. The employee stated the school is aware of occupant load capacity of the classrooms. He reported that he works together with the school's administration to ensure limits are not exceeded.</li> </ul>	See above	See above
If the charter school is not in a DOE facility, the charter school has the following on file:				

Compliance review subject	Yes/No	Evidence	Concerns	Comments
<i>Certificate of Occupancy for each building OR</i>	Yes	<ul style="list-style-type: none"> <li>• There was a copy of the Certificate of Occupancy posted on the school's "blue classroom building".</li> <li>• The school also utilizes a County facility, maintained by the County and not the school. The school does not keep a copy of the Certificate of Occupancy for the County building.</li> <li>• School Principal reported that they are working with the County Building Division on changes to the Certificate Of Occupancy for the building that the school maintains.</li> </ul>		
<i>Conditional Use Permit or Special Use Permit for each site</i>	N/A			
The charter school has developed a safety plan	Yes	<ul style="list-style-type: none"> <li>• Office staff provided the school's Safety Plan; kept in a file cabinet in the school office.</li> </ul>	See below: School has not provided training on its safety plan to all staff members.	<b>School follow-up:</b> Include the school's safety plan in faculty and staff trainings. Conduct training with all faculty and all staff on the safety plan. Conduct training on the safety plan with new hires who may have missed an earlier training.
There is evidence that staff has been trained in the school's safety plan	No	<ul style="list-style-type: none"> <li>• The school reported that all staff are trained in the school's safety plan and also</li> </ul>	Although the school reported that all staff are trained, some employees	See above

Compliance review subject	Yes/No	Evidence	Concerns	Comments
		<p>emergency preparedness, sometimes twice a year.</p> <ul style="list-style-type: none"> <li>• The school reported that the School Principal maintains the sign-in sheets from the trainings, however due to time, these were not reviewed during the site review.</li> <li>• During the visit employees reported that they either had some or no training on the school's plan.</li> </ul>	<p>reported that they either had some or no training on the school's plan.</p>	
Elementary schools have conducted monthly fire drills	Yes	School provided its log of monthly fire drills.		
High, middle, and intermediate schools have conducted quarterly drills	N/A			
The fire inspection on file at the school is not more than 1 year old	Yes	<ul style="list-style-type: none"> <li>• School's last fire inspection report is publicly posted on the school's "blue classroom building".</li> <li>• The position that manages the facilities is responsible for scheduling the annual inspection and spoke to the annual inspection requirements.</li> </ul>		<p><b>Best practice:</b> school's fire inspection report is publicly posted at the school; this is a high level of transparency that exceeds the requirement. Not only does this provide everyone access to the school's report, including any findings (strengths and safety issues), but also everyone can see when the school was last inspected and when the next one would be due.</p>

Compliance review subject	Yes/No	Evidence	Concerns	Comments
(if applicable) If the last fire inspection had findings, comments, or notations, the school is able to produce its plan to correct the findings OR the evidence that the findings and notations have already been resolved	N/A			
<b>GOVERNANCE - SITE REVIEW</b>				
Agendas are posted at a publicly accessible area in the charter school's office	Yes	Agendas are in a folder, as you enter the front office		
Written minutes from the governing board's meetings are available in a publicly accessible area in the charter school's office	Yes	<ul style="list-style-type: none"> <li>The school reported that a binder of the board's minutes is kept in the School Principal's office.</li> <li>School reported there are internal practices and front office staff knows to provide this to the public when asked.</li> </ul>		
A list of the current names and contact information of the governing board's members and officers are available in the charter school's office	No	<ul style="list-style-type: none"> <li>The list of members is not kept in the front office.</li> <li>School reported there are internal practices and front office staff knows to provide this to the public when asked; they would print a copy of the list from the school's website for the requester.</li> </ul>	302D-12(h)(6) states that governing boards shall maintain a list of the current names and contact information of the Governing Board's members and officers; in the charter school's office so it is available for review during regular business hours; and on the charter school's internet website.	<b>School follow-up:</b> the agendas are readily accessible to the public in the school's office. Make the governing board minutes and list of officers, members, and contact information also available at a publicly accessible area in the school's office so as to be available for review

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				during regular business hours
Training is conducted, with the school's Governing Board members and employees, on the State Code of Ethics	No	School reported that training is not provided for Governing Board members nor for employees on the State Code of Ethics.	Section 3.2 of the Charter Contract states: The School's Governing Board and employees shall comply with the State Code of Ethics, codified in Chapter 84, HRS.	<b>School follow-up:</b> Contact State Ethics Commission for training opportunities for employees and governing board members on the State Code of Ethics
(If applicable) Are any governing board members or charter school employees employed or considering employment by a private non-profit organization established to support the charter school?	N/A	School reported that there is no sharing of employees or members between the school and any non-profit organization established to support the charter school.		
If yes,	N/A			
is the board member or school employee prohibited from taking official school or board action affecting the non-profit organization?				
Is the board member or school employee prohibited from assisting the non-profit organization in matters before the charter school, and from acting as a representative for the non-profit organization in its interactions with the charter school?	N/A			



Compliance review subject	Yes/No	Evidence	Concerns	Comments
<b>ACCESS AND EQUITY - SITE REVIEW</b>				
If the school needed to use a lottery to determine which students will be allowed to enroll, there is documentation that the process was held in the manner described in the approved policy	N/A	<ul style="list-style-type: none"> <li>• School reported that in some years they school did have to conduct a lottery but not in the last 2 school years; all applicants were admitted.</li> <li>• School confirmed that it does not conduct interviews for admission or enrollment.</li> <li>• Registrar reported they have not seen discrimination of applicants.</li> <li>• School does conduct orientations and tours for prospective applicants.</li> </ul>		School was reminded to conduct a public lottery that is publicly noticed.
(if applicable) If the school needed to use a lottery, there is evidence that the school used a public lottery that was publicly noticed	N/A			
(if applicable) If the school is a conversion charter school, there is evidence that the school enrolls any student who resides within the school's former geographic service area for the grades that were in place when the department school converted to a charter school	N/A			

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<b>STUDENT CONDUCT AND DISCIPLINE - SITE REVIEW</b>				
If the school utilized restraint of a student the school maintains records of its reviews of restraint data and any resulting decisions or actions regarding the use of restraint	N/A	<ul style="list-style-type: none"> <li>• Dean of Students reported that she has a background in SPED.</li> <li>• School reported on their internal policy: will notify parents within 24 hrs. of an incident where restraining took place. Dean of Students would write a report on the same day of the incident and would be the person to contact parents. School reported they have a "hands off" policy but that in situations where students have become physical with each other sometimes holding students is the only way to stop a fight. In those situations the school staff must "make the call" and teachers are asked to defer to the Principal or Dean of Students to make that determination. In a discipline matter parents would be called to pick up the student.</li> </ul>		
The school has practices regarding student discipline that include procedures for suspension that protects the required due process rights of	Yes	<ul style="list-style-type: none"> <li>• School reported that they are aware of Manifestation Determination and spoke on this topic.</li> </ul>		

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students with IEPs or 504 plans		<ul style="list-style-type: none"> <li>School reported that it follows DOE's Chapter 19, which they report is in their Ohana Handbook. Handbook is distributed to families through the weekly communication folder. Signed acknowledgement sheets are collected from parents.</li> <li>School reported that the Complex Area is supportive of the charter school and there is a good working relationship on SPED matters.</li> </ul>		
<b>SCHOOL OPERATIONS - SITE REVIEW</b>				
SASA, or comparable school staff, is able provide their certificate of completion of the SASA Resources Student Privacy Course	No	<ul style="list-style-type: none"> <li>SASA Resources Student Privacy Course has not been completed by anyone at the school.</li> <li>School reported that the office staff may not have access to DOE Memos and that may be why they missed the DOE's notification on FERPA requirements.</li> </ul>	<ul style="list-style-type: none"> <li>Charter schools have privacy obligations under Family Education Rights and Privacy Act, 20 U.S.C. § 1232g (FERPA)</li> <li>Section 8.1 of the charter contract states: The School shall maintain student records for current and former students in accordance with the requirements of State and federal law, including the Family Education Rights and Privacy Act, 20 U.S.C. § 1232g (FERPA), as may be amended from time to time.</li> </ul>	<ul style="list-style-type: none"> <li><b>School follow-up:</b> Establish Lotus Notes and DOE Memos access for all applicable staff, including the school's position that is comparable to a SASA.</li> <li><b>School follow-up:</b> Contact Data Governance and Analysis Branch, at (808) 784-6050 for information on FERPA obligations and to ensure the school is in compliance with the DOE's requirements regarding FERPA.</li> </ul>

Compliance review subject	Yes/No	Evidence	Concerns	Comments
School was able to produce the signed Acknowledgement General Confidentiality Expectations forms for all staff and individuals who interact with students and/or student data	No	School reported it did not see the DOE Memo regarding Student Privacy/FERPA dated May 2018, the reminder sent on October 5, 2018, nor the due date on the Master Calendar.	See Concerns above	<b>School follow-up:</b> Ensure that school administrators, business managers, registrars, and any other applicable school office positions are 1) receiving the weekly DOE Memo emails from the Commission and 2) are informed about the Master Calendar posted on the Commission's website.
School is able to produce the signed Adult Publication/Audio/Video Release form, OSIP April 2017, for all adult employees and volunteers	No	See Evidence above	See Concerns above	See Comments above
SASA, Registrar, or other pertinent staff member, has a bookmark on their internet browsers with HIDOE's webpage, <a href="http://bit.ly/FERPAHI">http://bit.ly/FERPAHI</a> , to be able to reproduce pertinent student information privacy documents, notices, and/or forms.	No	<ul style="list-style-type: none"> <li>• School has not bookmarked the required page regarding student privacy.</li> <li>• School reported that upon enrollment students are provided the student privacy informational booklet. However, they did not collect signed acknowledgement forms from the students.</li> <li>• School reported have their own video/audio release forms.</li> </ul>	same as above	<ul style="list-style-type: none"> <li>• same as above</li> <li>• At the site review the school was informed that they must work with Data Governance and Analysis Branch on completing the FERPA checklist.</li> </ul>

Compliance review subject	Yes/No	Evidence	Concerns	Comments
The charter school has records that indicate:				
all employees are trained in the school's discipline policies	No	<ul style="list-style-type: none"> <li>The school reported that it does conduct teacher training on the school's discipline policies. Teachers are trained to support students as the school is "child-centered". In the school's program there is a process to make sure consequences align with discipline actions and student suspension is discouraged.</li> <li>During the review an employee reported that they had no training on the school's discipline policies.</li> </ul>	Although the school reported that staff are trained, some employees reported that they did not receive training on the school's discipline policies.	<b>School follow-up:</b> <ul style="list-style-type: none"> <li>include the school's discipline policies in faculty and staff trainings.</li> <li>Conduct training with all faculty and all staff on discipline policies.</li> <li>Conduct training on discipline policies with new hires who may have missed an earlier training.</li> </ul>
certification of the FERPA 101 video training for all individuals who interact with students and/or student data	No	<ul style="list-style-type: none"> <li>School reported its staff and faculty have not been asked to watch the FERPA 101 training videos</li> <li>During the review an employee reported that student privacy was discussed with them and they understand there is information that cannot be shared. If they have any questions about this, they know to ask their "supervisor".</li> </ul>	<ul style="list-style-type: none"> <li>Charter schools have privacy obligations under Family Education Rights and Privacy Act, 20 U.S.C. § 1232g (FERPA)</li> <li>Section 8.1 of the charter contract states: The School shall maintain student records for current and former students in accordance with the requirements of State and federal law, including the Family Education Rights and Privacy Act, 20 U.S.C. § 1232g (FERPA), as may be amended from time to time.</li> </ul>	<b>School follow-up:</b> Contact Data Governance and Analysis Branch, at (808) 784-6050 for information on FERPA obligations and to ensure compliance with the DOE's requirements regarding FERPA.
The Privacy Rights posters, RS 14-1820, is in a clearly visible location at the school site	Yes	Posted in school's front office		

Compliance review subject	Yes/No	Evidence	Concerns	Comments
(if applicable) If the school has more than 1 educational site, the school confirmed that the Privacy Rights posters, RS 14-1820, is in a clearly visible location at all of the school's sites	N/A	School has one instructional site		
School staff confirmed that the Parent Notification booklet, RS 18-0977, and Student Publication/Audio/Video Release insert, RS 16-1391 was distributed to each student	Yes	<ul style="list-style-type: none"> <li>School reported that upon enrollment students are provided the student privacy informational booklet. However, they did not collect signed acknowledgement forms from the students.</li> <li>School reported have their own video/audio release forms.</li> </ul>		
(random selection) School was able to produce student's returned signed forms:	No	<ul style="list-style-type: none"> <li>School did not collect signed acknowledgement forms from the students.</li> <li>School reported they have their own video/audio release forms.</li> </ul>	<ul style="list-style-type: none"> <li>Charter schools have privacy obligations under Family Education Rights and Privacy Act, 20 U.S.C. § 1232g (FERPA)</li> <li>Section 8.1 of the charter contract states: The School shall maintain student records for current and former students in accordance with the requirements of State and federal law, including the Family Education Rights and Privacy Act, 20 U.S.C. § 1232g (FERPA), as may be amended from time to time.</li> </ul>	<b>School follow-up:</b> Contact Data Governance and Analysis Branch, at (808) 784-6050 for information on FERPA obligations and to ensure the school is in compliance with the DOE's requirements regarding FERPA.
page 13 of the Parent Notification Booklet;	See above			

Compliance review subject	Yes/No	Evidence	Concerns	Comments
and student's returned Publication/Audio/Video Release Form, RS 16-1391, in each active student's file (random selection)	See above			
The school is able to produce its student withdrawal and transfer procedures	Yes	<p>Note- The day of the site review the Registrar was not available. On a later date a meeting was conducted over the phone.</p> <ul style="list-style-type: none"> <li>• The Registrar reported that the school does have a manual and the school's procedures are based on DOE practices.</li> <li>• During the review an employee reported that they were shown what to do regarding student transfers and enrollment but they do not reference a manual.</li> <li>• School reported that there is a checklist to conduct complete enrollment/withdrawal procedures.</li> <li>• School reported the Registrar conducts the immunization check.</li> <li>• A random sampling of student records was reviewed and one record did not have a report card. The school responded that they have</li> </ul>		

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		<p>changed from filing report cards every quarter to filing report cards only at the end of the school year. If a student transfers mid-year, a report card is printed.</p> <ul style="list-style-type: none"> <li>• School uses Infinite Campus to track student grades.</li> <li>• School reported it has a 1-2-day turn around for student transfers.</li> </ul>		
(if applicable) the Governing Board’s policy for attendance addresses the virtual and/or blended school program(s)	N/A	School confirmed it does not have a virtual or blended learning program.		
There is an assigned individual responsible for maintaining daily records of student attendance and absences	Yes	<ul style="list-style-type: none"> <li>• School reported attendance is taken once a day, every day.</li> <li>• Teachers input their attendance data into Infinite Campus by 8:30 AM. Office staff follows-up on the absent students.</li> <li>• Attendance is tracked on a spreadsheet. The data is taken from Infinite campus and put into the spreadsheet which is used to generate letters to families, based on the number of absences as dictated by the school's policy.</li> </ul>		Suggestion: provide employees written procedures/practices for student attendance.



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		<ul style="list-style-type: none"> <li>School reported that they do not have written procedures for tracking absences.</li> </ul>		
<p>The School's withdrawal and transfer procedures provides for the transfer of the student's records to the new school in a reasonable timeframe</p>	<p>Yes</p>	<ul style="list-style-type: none"> <li>School reported it takes 1-2 days to release students on Infinite Campus and 2-3 days to mail out the cumulative folder. If this is in the middle of the year it may take more time because follow-up with teachers are needed to get grades in the middle of the term; this takes more time.</li> <li>School reported there is an upcoming DOE training in December on Oahu. School is on the notification list and does receive information on upcoming meetings.</li> <li>School wanted to report that PowerSchools takes a long time to release students; can be up to 1 week. Infinite Campus should be used by all schools. It is more user friendly than the previous system.</li> <li>Note: It was shared that there are misconceptions on what a charter school registrar does and Commission needs to push that schools employ experienced registrars. They</li> </ul>		

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		<p>shared that this crucial position crucial is important to the smooth operations of a charter school; it is important that school administrators and the Commission realize this. At Nā Wai Ola one position does registrar work, record keeping/management of reimbursements related to the Pre-K program, some business manager work, SASA work, and is a cultural advisor to the school - an example of "many hats" expectations at charter schools.</p>		
<p>The school adheres to its process for resolving public complaints</p>	<p>Yes</p>	<ul style="list-style-type: none"> <li>School staff reported that the process for resolving complaints is working. Sometimes complainants don't follow the procedures of the policy, they want to skip the step to work with the Principal. In this case the governing board has reinforced the policy and referred the complainant to the Principal. School staff reports that has been helpful and that the school's process for complaints is clear.</li> </ul>		
<p>(if applicable) (Check Epicenter for transportation form, print out list of drivers,</p>	<p>No</p>	<ul style="list-style-type: none"> <li>School reported they are aware that there a record keeping items related to</li> </ul>	<p>Section 8.8 of the Charter Contract states: The School may provide its own</p>	<p><b>Notice of Concern:</b> Issued for non-compliance with Section 8.8 of the Charter</p>

Compliance review subject	Yes/No	Evidence	Concerns	Comments
at site review) Driver qualification folders contain the key components for each driver:		<p>student transportation but they have not done this yet. They are currently working on organizing the school's personnel files.</p> <ul style="list-style-type: none"> <li>Schools Registrar also manages personnel files and reported being familiar with the needed components of the driver qualification folders.</li> <li>School reported that maintaining school buses is a significant task. There are frequent breakdowns and limited available mechanics.</li> <li>The position in charge of facilities management also maintains the vehicles.</li> </ul>	<p>transportation services, provide transportation through an agreement or contract with a private provider, or access any other school transportation provided to it by law. Pursuant to Section 286-181, HRS, any transportation services provided by the School shall follow the safety rules and standards relating to school vehicles, equipment, and drivers adopted by the Department of Transportation.</p> <p>Charter schools were notified that as of October 31, 2017 schools providing pupil transportation services to transport students to and from a school, school functions, or school-related events, have to be registered with Department Of Transportation</p>	<p>Contract.</p> <p><b>School follow-up:</b> Contact the Department of Transportation for information on the Driver Qualification Folders:  Susan Chang  Motor Carrier Safety Manager  Phone: 808-692-7657  Email: susan.chang@hawaii.gov  Resource material on student transportation:  <a href="https://drive.google.com/drive/folders/0B4V5JhmlcP92ZmZVNkVHSENVNms">https://drive.google.com/drive/folders/0B4V5JhmlcP92ZmZVNkVHSENVNms</a></p>
Current medical certificate	See above			
Annual traffic abstract from Hawaii and the state in which the driver is licensed	See above			
Copy of a valid driver's license of the appropriate class, type 3 or 4 as designated by HRS;	See above			
Copy of bus driver's examination on school bus laws and rules	See above			
Participation in school bus driver training activities	See above			

Compliance review subject	Yes/No	Evidence	Concerns	Comments
Commendations or complaints	See above			
Accidents involving the bus driver	See above			
Certification of a TB examination	See above			
School arranges for DOT inspections of vehicles used to transport students	Yes	School provided its current safety check and reported that they take the vehicles to an authorized state vendor		
School maintains DOT inspection records	N/A	<ul style="list-style-type: none"> <li>School provided its current safety check and provided its folder of documents related to the vehicles.</li> <li>School has not had a site inspection from the DOT</li> </ul>		<b>School follow-up:</b> Contact the Department of Transportation for information on the requirements to be prepared for site inspections by DOT- Susan Chang Motor Carrier Safety Manager Phone: 808-692-7657 Email: susan.chang@hawaii.gov Resource material on student transportation: <a href="https://drive.google.com/drive/folders/0B4V5JhmlcP92ZmZVNkVHSENVNms">https://drive.google.com/drive/folders/0B4V5JhmlcP92ZmZVNkVHSENVNms</a>
<b>PERSONNEL- DESK REVIEW</b>				
The charter school is registered as a qualified	Yes	The Charter Commission received a list from HCJDC in October 2017		

Compliance review subject	Yes/No	Evidence	Concerns	Comments
entity with the Hawaii criminal justice data center.		of the registered charter schools. Nā Wai Ola School was on the list.		
(If applicable) If the charter school has been audited by the Hawaii Criminal Justice Data Center (HCJDC) there were no significant findings	Yes	On November 28, 2018 HCJDC was asked whether the school is currently in good standing regarding HCJDC requirements. It was reported that Nā Wai Ola is in good standing.		
The charter school has established policies and procedures that meet Section 9.4 of the Charter Contract for reporting incidents, which include the disciplinary actions for failing to reports these incidents	Yes	The school's Reporting Crime-Related Incidents Policy is posted on the school's website: <a href="https://nawaiolapcs.org/wp-content/uploads/documents-misc/SY-16-17-Crime-Reporting-Policy.pdf">https://nawaiolapcs.org/wp-content/uploads/documents-misc/SY-16-17-Crime-Reporting-Policy.pdf</a>	The school's policy dictates action by the Commission. Policy states: "(a) The Hawai'i Charter School Commission shall furnish an annual written notice to NWOPCS that failure to report class A or class B offenses occurring on campus, or other education premises, on NWOPCS transportation, or during a NWOPCS sponsored activity or event on or off school property may result in disciplinary actions against responsible teachers, officials, or other employees of NWOPCS..."	<b>School follow up:</b> Contact the Charter Commission's office to clarify this section of the school's policy; the Charter Commission does not furnish an annual notice as described.
The charter school has not received a notification letter of concern, or any other official communication regarding concerns, from the Hawaii Teachers Standards Board (HTSB)	No	On November 26, 2018 HTSB was asked whether there were any findings of non-compliance related to the school. It was reported that Nā Wai Ola has two teachers that do not have active licenses.	Section 12.3 of the Charter Contract states: Pursuant to Section 302A-804, HRS, the School shall hire licensed teachers that meet the applicable State licensing requirements consistent with federal law and requirements, State law, and collective bargaining agreements, as such requirements may be amended.	<b>Notice of Concern:</b> issued for non-compliance with 12.3 of the Charter Contract.

Compliance review subject	Yes/No	Evidence	Concerns	Comments
<b>HEALTH AND SAFETY - DESK REVIEW</b>				
The charter school's safety plan is accessible from the School's website	Yes	On 11/28/18 the school's website was reviewed. Although there isn't a policy called "Safety Plan", the school had posted policies related to safety: School Bus Rules, Internet Safety Acceptable Use Policy, Parent Handbook.		Suggestion: Consider providing a policy named Safety Plan. It may be a compilation of existing school policies that facilitates a safe learning environment at all times.
Review fire inspection reports for all years of the charter contract:				
Are there repeat findings/notations in consecutive years of the annual reports	N/A	The school's contract began in July 2017. As such, only 1 fire inspection report has been collected during the term of the contract. Thus, it's not possible to determine repeat findings in consecutive years.		
Has the school submitted a fire inspection report for all instructional sites listed in the school's Exhibit A for each year of the charter contract?	Yes	School has one instructional site.		
<b>GOVERNANCE-DESK REVIEW</b>				
Not more than 1/3 of the governing board's voting members are:				
Employees or former employees of any charter school, unless one year has passed since the conclusion employment with the school;	Yes	School's roster submitted on 9/24/18, reported 7 voting members. Of the 7 members, 2 are reported as employees or former employees. This is less		

Compliance review subject	Yes/No	Evidence	Concerns	Comments
		than 1/3 of the board's voting members.		
Relatives of employees or former employees of any charter school unless one year has passed since the conclusion employment with the school; and	Not able to determine	On 9/24/18 membership roster, the school's chair is listed as a non-voting member.	The school has not reported that any of its members are relatives of any employees, however there is a question regarding the board's chair. The matter will need a review by the State Ethics Commission.	<b>School follow-up:</b> Contact the State Ethics Commission for a review of any relationship the board's chair may have with an employee of the charter school in relationship to HRS 302D-12
Vendors or contractors providing goods or services to any charter school under the jurisdiction of that governing board, unless at least one year has passed since the conclusion of the vendor or contractor's service	Yes	All of the governing board members are board members or employees of a nonprofit organization Waters of Life New Century Public Charter School (reported to Commission as Nā Wai Ola PCS). However, it is also reported that the nonprofit organization does not provide services to the school for a fee.		
Does the school have an exemption, from the Commission, that allows the governing board's chair to be an employee, former employee, relative of an employee or former employee, or a vendor or contractor	No	<ul style="list-style-type: none"> <li>In the 9/24/18 membership roster, the school's chair is listed as a non-voting member and not reported as an employee, nor a relative, nor a vendor.</li> <li>There is a question of whether the board chair's relationship with an employee fits the definition of "relative of an employee".</li> </ul>	The matter will need to be reviewed by the State Ethics Commission. If the chair is found to be a relative of an employee, the school will exceed the 1/3 limit on the specified categories. Also, the individual will not be able to serve as the board's chair.	<b>School follow-up:</b> Contact the State Ethics Commission for a review of any relationship the board's chair may have with an employee of the charter school in regards to HRS 302D-12

Compliance review subject	Yes/No	Evidence	Concerns	Comments
If no exemption has been granted, the governing board's chair is not a/an:				
Employee or former employee of the charter school (unless one year has passed since the conclusion of employment);	N/A			
Relative of an employee or former employee (unless one year has passed); or	See above			
Vendor or contractor providing goods or services (unless at least one year has passed since the conclusion of service)	N/A			
Agendas are posted on the charter school's internet website	Yes	Website was reviewed on 11/28/18: <a href="https://nawaiolapcs.org/governing-board/minutes-agendas/">https://nawaiolapcs.org/governing-board/minutes-agendas/</a>		
The charter school keeps written minutes of all public meetings that include:				
The date, time, and place of the meeting;	No	Although agendas provide a location of the meeting "Nā Wai Ola Administration Office" the minutes did not (see 8/21/18 minutes).	HRS 302D-12(h)(3)(A) states that governing boards shall keep written minutes of all public meetings that shall include: the date, time, and place of the meeting.	<b>School follow-up:</b> Include in the board's minutes the place where the governing board meeting was held.
All governing board members recorded as either present or absent;	Yes			



Compliance review subject	Yes/No	Evidence	Concerns	Comments
The substance of all matters proposed, discussed, and decided;	Yes			
The views of the participants;	Yes			
A record, by individual member, of any votes taken;	No	<ul style="list-style-type: none"> <li>• Votes are tallied but not reported by individual member (see 8/21/18 minutes).</li> <li>• It was reported to the Commission that certain members are not voting members but from the tallies, it appears non-voting members may be casting votes and making motions for the board. For example, the 8/21/18 minutes in which two motions are voted on, six votes are cast for each motion. In the list of attendees six members are present at the meeting. However, two of the attendees were reported to the commission on 9/24/18 as a non-voting members.</li> <li>• According to the school's bylaws, if there is a tie the board's chair will vote. The chair then should be reported as a member with the ability to cast a vote; not as a non-voting member.</li> </ul>	HRS 302D-12(h)(3)(E) states that governing boards shall keep written minutes that shall include a record, by individual member, of any votes taken.	<p><b>School follow-up:</b></p> <ul style="list-style-type: none"> <li>• Submit to Epicenter an updated governing board roster that correctly reports on the voting status of each member.</li> <li>• Include in the board's minutes a record by individual member of any votes taken.</li> <li>• Ensure that only the members reported to the Commission as voting members are allowed to cast votes and make motions.</li> </ul> <p>Review the validity of all prior motions taken by the board, including 8/21/28; any actions by the board that were passed with votes from ineligible members may not be valid. This will need to be rectified by the governing board.</p>
Any other information that any member of the governing				

Compliance review subject	Yes/No	Evidence	Concerns	Comments
board requests be included or reflected in the minutes;				
Governing board meeting minutes are posted on the charter school's website within sixty calendar days after the public meeting or five calendar days after the next public meeting, whichever is sooner	Yes	Minutes are posted: <a href="https://drive.google.com/drive/folders/1xw42gmRQMI7LAnhdJ_C9t0SsxaY1H9ba">https://drive.google.com/drive/folders/1xw42gmRQMI7LAnhdJ_C9t0SsxaY1H9ba</a>		
A list of the current names <b>and</b> contact information of the governing board's members <b>and</b> officers on the charter school's internet website	Yes	A list is maintained on the school's website: <a href="https://nawaiolapcs.org/governing-board/minutes-agendas/#">https://nawaiolapcs.org/governing-board/minutes-agendas/#</a>		
<b>ACCESS AND EQUITY – DESK REVIEW</b>				
Approved admission policy (and application, if school is accepting applications) is posted on school's website	No	<ul style="list-style-type: none"> <li>The Admission Policy posted on the school's website is not the policy approved by the Commission: <a href="https://nawaiolapcs.org/ohana/policies-procedures/attachment/admissions-policy-procedures/">https://nawaiolapcs.org/ohana/policies-procedures/attachment/admissions-policy-procedures/</a></li> <li>This is a repeat finding for the school. In the SY15-16 Commission site visit report, the school was notified that the posted policy was not the Commission-approved policy and that the school needed to remove any postings of the</li> </ul>	Section 7.3 of Charter Contract states that the school shall comply with its admission policies and procedures as approved by the Commission and these policies and procedures shall be readily accessible from the School's website, as described in Section 8.9 of this Charter Contract	<b>Notice of Concern:</b> Issued for non-compliance with section 7.3 and 8.9 of the Charter Contract <b>School follow-up:</b> Contact the Commission's office to amend the school's Admission Policy. Sylvia Silva 808-586-3781

Compliance review subject	Yes/No	Evidence	Concerns	Comments
		unapproved policy and post the school's approved policy		
<b>SCHOOL OPERATIONS - SITE REVIEW</b>				
The front page of school's website contains student information privacy hyperlink to the HIDOE's webpage, <a href="http://bit.ly/FERPAHI">http://bit.ly/FERPAHI</a>	Yes			
The school's attendance policy is accessible from the School's website	Yes	The school's attendance policy is posted on the school's website in its Parent Handbook		
The School has a process for resolving public complaints, which includes an opportunity for complainants to be heard by the School's Governing Board	Yes	Step 4 of the Complaint Procedure and Policy posted on the school's website states: When avenues of resolution 1 through 3 have failed or if your complaint is against NWO's Educational Director/Principal and could not be resolved after Step 1 then notify Nā Wai Ola's Governing Board by submitting the Complaint Form in the Governing Board Box located in NWO's Admin Building or by mail to: Nā Wai Ola PCS Attn: Governing Board PO Box 711539 Mountain View, HI. 96771		

Compliance review subject	Yes/No	Evidence	Concerns	Comments
		The Board will confirm receipt of the complaint. Please allow 7 business days for confirmation.		
The school's complaints process is accessible from the School's website	Yes	Complaint Procedure – External, Complaint Procedure Form – External, and Complaints Procedure Flowchart – School-wide are all posted on the school's website: <a href="https://nawaiolapcs.org/ohana/policies-procedures/">https://nawaiolapcs.org/ohana/policies-procedures/</a>		
The School current versions of the following policies and procedures readily accessible from its website:				
Admissions policies and procedures	No	<ul style="list-style-type: none"> <li>The Admission Policy posted on the school's website is not the policy approved by the Commission: <a href="https://nawaiolapcs.org/ohana/policies-procedures/attachment/admissions-policy-procedures/">https://nawaiolapcs.org/ohana/policies-procedures/attachment/admissions-policy-procedures/</a></li> <li>This is a repeat finding for the school. In the SY15-16 Commission site visit report, the school was notified that the posted policy was not the Commission-approved policy and that the school needed to remove any postings of the unapproved policy and post the school's approved policy</li> </ul>	Section 7.3 of Charter Contract states that the school shall comply with its admission policies and procedures as approved by the Commission and these policies and procedures shall be readily accessible from the School's website, as described in Section 8.9 of this Charter Contract	<b>Notice of Concern:</b> Issued for non-compliance with section 7.3 and 8.9 of the Charter Contract

Compliance review subject	Yes/No	Evidence	Concerns	Comments
Student conduct and discipline policy	Yes	See Parent Handbook		
Complaints procedures	Yes			
Attendance policies and procedures	Yes	See Parent Handbook		
Procurement policy	Yes	See Financial Operations Manual		
Safety plan	Yes	On 11/28/18 the school's website was reviewed and although there isn't a policy called Safety Plan that is posted, the school had posted policies related to safety: School Bus Rules, Internet Safety Acceptable Use Policy, Parent Handbook.		Suggestion: To prevent confusion over compliance with Section 9.1 of the Charter Contract, consider providing a policy named Safety Plan. It may be a compilation of existing school policies that facilitates a safe learning environment at all times.
Financial management policies and procedures	Yes	See Financial Operations Manual		

## Financial Performance Review

AREA OF FOCUS:	1. On-Site Financial Records: <i>Determine whether files are secure (how is access limited and who has access). Review fiscal files for key components: a) approval by authorized sources; b) proper supporting documents available for all purchases; c) Check writing procedures available and proof of adherence to GAAP accordant related policy.</i>	
Evidence of Compliance	Concerns	Comments
<ul style="list-style-type: none"> <li>● School maintains a locked fiscal office with keys to both the office and the file cabinets containing fiscal documents secured by the Director and the Interim Business Manager only. No evidence of unsecured fiscal documentation was noted.</li> <li>● Purchase receipts for Fiscal Year 2018-2019 are lacking the appropriate Purchase Requisition Forms required by the School's Procurement Policy posted for all tested inquiries during the visit.</li> <li>● Check writing tests showed that appropriate controls were being executed in accordance with GAAP and all check copies had appropriate signature authorizations.</li> </ul>	<p>Onsite Financial Records are in a secure location that is locked with appropriate access to approved school personnel. A review of the financial records illustrated that procurement procedures adopted by the Governing Board of the school are not being completed. Specifically, the completion of purchase requisition documentation and approvals for purchases are not being completed, and receipts for purchases are missing. Check writing procedures are appropriate and adhere to GAAP principles.</p> <p>Section 6.1, Fiscal Responsibilities, of the Charter Contract requires that "the School shall maintain accurate and comprehensive financial records, practice governmental accounting in accordance with Generally Accepted Accounting Principles, and use public funds in a fiscally responsible manner."</p> <p>Section 6.3, Procurement, of the Charter Contract requires that "Pursuant to Sections 302D-25(b) and 302D-12(d), HRS, the School and its Governing Board shall be exempt from Chapter 103D, HRS. However, the School's Governing Board shall develop and adhere to a policy for the procurement of goods, services, and construction consistent with the goals of public accountability and public procurement</p>	<p><b>Notice of Concern:</b> issued for non-compliance with Sections 6.1 and 6.3 of the Charter Contract.</p> <p>School Interim Business Manager acknowledged that the policies were not being followed and stated that she would begin the process of retroactively gaining approval for any transactions that fell outside of the school's existing policies.</p>

	practices. The policy shall be readily accessible from the School’s website.”	
<b>AREA OF FOCUS:</b>	2. <i>Computer-Based Financial Records: Prior to the site visit, review procedures. During the site visit, review the process described by the school – does it have similar components to security as on-site financial records? Who has access and are the controls appropriate?</i>	
<b>Evidence of Compliance</b>	<b>Concerns</b>	<b>Comments</b>
<ul style="list-style-type: none"> <li>Visual confirmation of access availability to computer based financial records noted that only the Auditor, School Director, and Interim Business Manager are granted access to online records at this time.</li> </ul>	None.	Computer-Based Financial Records at the school are secure and have the appropriate access restrictions. The school utilizes an online system that allows for timely reconciliations and is standard for governmental accounting.
<b>AREA OF FOCUS:</b>	3. <i>Fiscal Policies: The school’s policy for the procurement of goods, services and construction is consistent with the goals of public accountability and public procurement practices. If no, what is the school’s current practice?</i>	
<b>Evidence of Compliance</b>	<b>Concerns</b>	<b>Comments</b>
<ul style="list-style-type: none"> <li>Chapter 2-Accounts Payable/Disbursements of the school’s Financial Operations Manual as it appears on the school website, and in effect since 2011, requires an employee to submit a purchase order and receive Director approval before expenditure of school funds is permitted. This policy is consistent with public procurement</li> </ul>	The fiscal policies that appear on the school’s website are not being followed as stated. Specifically, Chapter 2-Accounts Payable/Disbursements of the school’s Financial Operations Manual requires an employee to submit a purchase order and receive Director approval before expenditure of school funds is permitted. As stated by the Interim Business Manager and supported by review of fiscal records, the school is not currently following this policy and unsecured debit cards are in use by multiple staff members for expenditure purposes despite school	<p><b>Notice of Concern:</b> issued for non-compliance with Sections 6.1 and 6.3 of the Charter Contract.</p> <p>School Interim Business Manager stated that she would review existing Debit Card Policies and implement corrective actions where necessary.</p>

<p>practices and should be followed by school personnel at all times. Onsite review of purchase documentation and staff comments confirmed lack of policy compliance.</p>	<p>policy that requires the cards to be signed out for a specific purpose and then returned.</p> <p>Section 6.1, Fiscal Responsibilities, of the Charter Contract requires that “The School shall maintain accurate and comprehensive financial records, practice governmental accounting in accordance with Generally Accepted Accounting Principles, and use public funds in a fiscally responsible manner.”</p> <p>Section 6.3, Procurement, of the Charter Contract requires that, “Pursuant to Sections 302D-25(b) and 302D-12(d), HRS, the School and its Governing Board shall be exempt from Chapter 103D, HRS. However, the School's Governing Board shall develop and adhere to a policy for the procurement of goods, services, and construction consistent with the goals of public accountability and public procurement practices. The policy shall be readily accessible from the School’s website.”</p>	
<p><b>AREA OF FOCUS:</b></p>	<p><b>4. Internal Controls and Segregation of Duties: <i>Evidence the school is following all of its fiscal policies and that they are readily available and understood by staff and administration. Do these policies adhere to GAAP principles?</i></b></p>	
<p><b>Evidence of Compliance</b></p>	<p><b>Concerns</b></p>	<p><b>Comments</b></p>



<ul style="list-style-type: none"> <li>● School Interim Business Manager was unable to provide any current fiscal policies when asked. Stated that she was unaware that they were in writing and needed to review them as she continued to learn the position.</li> </ul>	<p>School Interim Business Manager was unaware of approved and posted fiscal policies and was relying on training provided by existing administrative staff to complete job duties that were not aligned with approved policies and procedures.</p> <p>Section 6.1, Fiscal Responsibilities, of the Charter Contract requires that “The School shall maintain accurate and comprehensive financial records, practice governmental accounting in accordance with Generally Accepted Accounting Principles, and use public funds in a fiscally responsible manner.”</p> <p>Section 6.3, Procurement, of the Charter Contract requires that, “Pursuant to Sections 302D-25(b) and 302D-12(d), HRS, the School and its Governing Board shall be exempt from Chapter 103D, HRS. However, the School's Governing Board shall develop and adhere to a policy for the procurement of goods, services, and construction consistent with the goals of public accountability and public procurement practices. The policy shall be readily accessible from the School’s website.”</p>	<p><b>Notice of Concern:</b> issued for non-compliance with Sections 6.1 and 6.3 of the Charter Contract.</p> <p>School Interim Business Manager stated that she was just beginning to learn the job and would take the necessary steps to familiarize herself with school policies and procedures. A copy of the school’s fiscal policies and procedures was provided to school staff by SPCSC staff.</p>
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<p style="text-align: center;"><b>AREA OF FOCUS:</b></p>	<p style="text-align: center;"><b>5. Compliance: <i>Prior to site visit, review any outstanding compliance issues relating to Financial Performance.</i></b></p>	
<p><b>Evidence of Compliance</b></p>	<p><b>Concerns</b></p>	<p><b>Comments</b></p>
<ul style="list-style-type: none"> <li>● The Fiscal Year 2017- 2018 audit for the school does not indicate any continued audit findings for the school.</li> </ul>	<p>The school received an audit finding for Fiscal Year 2016-2017 related to journal entries that were not completed prior to the financials being submitted to the auditor for review. The school submitted a Corrective Action Plan to address the Notice of Concern that was subsequently approved by the Commission. The Fiscal Year 2017- 2018 audit for the school does not indicate that this finding has continued.</p>	<p>The school appears to have resolved this prior audit finding.</p>
<p style="text-align: center;"><b>AREA OF FOCUS:</b></p>	<p style="text-align: center;"><b>6. Roles and Responsibilities: <i>Policies and Procedures demonstrate a strong understanding of the appropriate delineation of such roles and responsibilities among the proposed school leadership team or management team and proposed school governing board regarding school financial oversight and management.</i></b></p>	
<p><b>Evidence of Compliance</b></p>	<p><b>Concerns</b></p>	<p><b>Comments</b></p>
<ul style="list-style-type: none"> <li>● School Interim Business Manager was unable to provide any documentation of Governing Board reconciliations or reviews for the current Fiscal Year 2018-2019 financials and was not able to confirm that the Governing Board was aware of current breaches of fiscal policy for possible decision making.</li> </ul>	<p>School Interim Business Manager and Director are currently not implementing existing fiscal policies and procedures to ensure the financial oversight of the school, and the Governing Board has not addressed this issue to date.</p> <p>Section 6.4, Management and Financial Controls, of the Charter Contract requires that “The School's Governing Board shall develop and adhere to a policy for the School’s financial management that shall be readily accessible from the School’s website, as described in Section 8.9. This policy shall allow the School to maintain appropriate governance and management procedures and financial controls which shall include, but not be limited to: a. Budgets; b.</p>	<p><b>Notice of Concern:</b> issued for non-compliance with Section 6.4 of the Charter Contract.</p> <p>The school’s existing Fiscal Policies and Procedures as written and approved by the school Governing Board are appropriate and delineated properly to maintain oversight and management if implemented accordingly.</p>

	Accounting policies and procedures; c. Payroll procedures; d. Financial reporting; and e. Internal control procedures for receipts, disbursements, purchases, payroll, inventory, and fixed assets.”	
<b>AREA OF FOCUS:</b>	<b>7. Budget: <i>Complete, realistic, and viable operating budget that aligns to the Financial Performance Framework.</i></b>	
<b>Evidence of Compliance</b>	<b>Concerns</b>	<b>Comments</b>
<ul style="list-style-type: none"> <li>An approved Fiscal Year 2018-2019 School Budget is posted and available for appropriate staff review in the Business Office.</li> </ul>	None.	The school maintains a viable operating budget that has been approved and submitted by the Governing Board and aligns to the Financial Performance Framework.

## Academic Performance Review

On Thursday, November 1, 2018, Commission staff visited Nā Wai Ola Public Charter School, arriving at 8:00 AM in order to observe morning piko. Commission staff met Jason Wong, Director, on campus while students were having breakfast, and walked over with him to the gym for the school's morning routine. For the rest of the day, Commission staff were accompanied by Jason and Lore-lin Makaiwi, Dean of Students, the school's lead administrators.

The school prepared a schedule of classroom visits that took Commission staff through all nine classrooms (pre-K through grade 6, including one grade 1 and 2 "combo" classroom) during the course of the morning. School administrators engaged in an open dialogue with Commission staff during the walking tour, and Jason provided an overview of what Commission staff should expect to see and the teacher's strengths/areas for improvement prior to entering each classroom. Classroom observations were about 15 minutes long, after which Commission staff and school administrators informally debriefed.

Following the classroom visits, Commission staff debriefed with Jason, Lore-lin, and Christina Yasuhara, reading specialist, in the school office. The group then moved off site and continued to meet over lunch until approximately 2:00 PM. During this time, the school administrators presented their responses to the self-reflection questions provided by Commission staff prior to the visit, and Commission staff clarified and confirmed what was observed and shared observations and feedback specifically related to the contract sections that were the focus of the site visit. Further details are outlined below.

Structured bullet points pull directly from the school's Charter Contract. Under each bullet point is related evidence of compliance, concerns, and comments based on Commission staff's observations from the site visit.

<p><b>CONTRACT FOCUS AREA</b></p>	<p><b>Section 4.2 Material Elements of Educational Program</b>  The material elements of the School's Educational Program, including but not limited to the School's mission and vision statements, are as set forth in Exhibit A to this Charter Contract. The School shall, at all times, operate in a manner consistent with its Educational Program as defined in Exhibit A. Revisions to any of the elements in Exhibit A (such as establishing, creating, or expanding a virtual or blended learning programs or expanding or eliminating a division) shall be considered a material change to the Charter Contract and shall require prior written approval by the Commission. Where appropriate, this approval shall be informed by an analysis of the School's performance on the Performance Frameworks under Section 5.1 of this Charter Contract particularly to the extent that such changes are intended to improve educational outcomes.</p> <p><u>Mission and Vision:</u>  Our mission is to provide a first class private school education in a nurturing environment which ensures academic success for ALL students at a Public School Price.  All Nā Wai Ola students shall have confidence in the ability to achieve at the highest level as lifelong learners who can become productive leaders and community contributors in a global society with Hawaiian Culture and values as guiding principles.</p>	
<p><b>Evidence of compliance</b></p> <ul style="list-style-type: none"> <li>Limited evidence of compliance with the mission and vision, as the school has revisited and revised its mission and vision since executing its current Charter Contract.</li> <li>Observed morning piko, which included oli and hula specific to the geographic region of the school performed by all students, faculty, and staff.</li> </ul>	<p><b>Concerns</b></p> <ul style="list-style-type: none"> <li>The school is currently operating with a mission and vision that are different from those approved by the Commission and described in the Charter Contract.</li> </ul>	<p><b>Comments</b></p> <ul style="list-style-type: none"> <li><b>Notice of Concern:</b> issued for non-compliance with Section 4.2 of the Charter Contract.</li> <li>Evidence of compliance with the operational mission and vision was observed throughout the site visit. To correct the discrepancy between the operational mission and vision and the mission and vision described in the Charter Contract, the school plans to include the updated versions in its contract renewal application.</li> </ul>

CONTRACT FOCUS AREA	<u>Essential Term #1:</u> An education program that is comprehensive, challenging, purposefully integrated, relevant, and based on Hawaii Common Core standards. Our academic program is designed to enable our students to meet school, state and federal benchmarks for Hawaii State Assessment Testing (HSA) on a consistent basis.	
Evidence of compliance	Concerns	Comments
<ul style="list-style-type: none"> <li>• Consistent learning expectations/standards posted in every classroom</li> <li>• The school exceeded all but one of the academic targets in its Charter Contract for school year 2017-2018</li> <li>• Consistent language of instruction was evident across the school</li> <li>• Use of Go Math, a Common Core-aligned curriculum</li> <li>• Positive student-teacher interaction that supports student academic growth</li> <li>• Ongoing Orton Gillingham (OG) reading support program training for entire staff</li> <li>• For the school's Value Added Measure, faculty-developed curriculum maps for each grade level focused on a selected Common Core anchor standard.</li> </ul>	<ul style="list-style-type: none"> <li>• None.</li> </ul>	<ul style="list-style-type: none"> <li>• The teachers and administration make do with limited facilities, as appropriate instructional space is at a premium and many classes are in makeshift classrooms.</li> <li>• All faculty and administrators participate in an annual retreat prior to the beginning of the school year to build culture and community and to participate in training/professional development together.</li> <li>• The school's administrative team meets before the retreat to plan and organize the content of the staff retreat.</li> <li>• Staff looked at various ELA curricula and decided against forcing themselves to use one that did not meet their needs. Instead, they are using this year to write their own ELA curriculum, while implementing the staff development in Orton Gillingham and consistent writing language across the vertical spectrum.</li> </ul>

<p>CONTRACT FOCUS AREA</p>	<p><u>Essential Term #2:</u> A school priority is for a level of classroom instruction that appropriately meets the intellectual and developmental needs and characteristics of every student. We have extended the academic day to 4:30pm. This allows our students to receive one-on one academic and personal management support from our academic and support staff.</p> <p>and</p> <p><u>Essential Term #3:</u> Our education program teaches and emphasizes personal accountability for academic success. Our students are provided with organization and structure that support academic and personal management skills within the academic day.</p>		
Evidence of compliance	Concerns	Comments	
<ul style="list-style-type: none"> <li>• Use of personalized composition books</li> <li>• Classroom rituals and routines were evident</li> <li>• Visual references were available for students</li> <li>• Standards were evident in every classroom</li> <li>• Students were observed receiving extra support (RTI - Tiers 2 and 3)</li> <li>• Ongoing Response to Intervention (Rtl) training for entire staff</li> <li>• The use of educational assistants (EAs) in every classroom supported instruction and was observed to support student entrance into the instructional content</li> <li>• EAs provided one-on-one and small-group instruction and academic support.</li> <li>• Appropriate Behavioral intervention on multiple occasions.</li> <li>• Students appeared well aware of established school rituals and routines both inside of the classroom setting and in more unstructured areas.</li> <li>• Students were given instructional tools that promote choice, independent work and decision making as well as collaboration.</li> </ul>	<ul style="list-style-type: none"> <li>• The school does not currently offer an extended academic day to 4:30 PM.</li> </ul>	<ul style="list-style-type: none"> <li>• <b>Notice of Concern:</b> issued for non-compliance with Section 4.2 of the Charter Contract.</li> <li>• In order to offer an extended day, the school needs approval from the Hawaii Department of Human Services (DHS). This approval has been held up due to delays on the part of DHS regarding the school's pre-K license.</li> <li>• School administrators described regular use of multiple data sources (<i>i.e.</i>, i-Ready for math and English language arts, DIBELS for literacy) to triangulate results and inform both Rtl and regular instruction.</li> </ul>	

<b>CONTRACT FOCUS AREA</b>	<b>Section 4.3 Academic Standards</b> As determined by BOE Policy 102-3, as may be amended, the School shall implement the Common Core or other State academic standards. The School shall retain the autonomy to select a particular curricular and/or instructional approach consistent with the Common Core or other applicable State academic standards.	
<b>Evidence of compliance</b>	<b>Concerns</b>	<b>Comments</b>
Due to the significant overlap between this contract section and the school’s Essential Term #1, the evidence of compliance is the same as that for Essential Term #1 above.	Due to the significant overlap between this contract section and the school’s Essential Term #1, the concerns are the same as those for Essential Term #1 above.	Due to the significant overlap between this contract section and the school’s Essential Term #1, the comments are the same as those for Essential Term #1 above.



**Exhibit 3**  
**Nā Wai Ola Public Charter School**  
**SY 2017-2018 Performance Report**

## Academic Performance Framework

### I. Student Academic Outcomes

Academic Proficiency			
Subject	% Proficient: TARGET	% Proficient: ACTUAL	Met target?
Math	23% - 32%	36%	Exceeded
ELA	22% - 31%	41%	Exceeded
Science	35% - 44%	<i>Data suppressed</i>	Exceeded

Academic Growth			
Subject	Median SGP: TARGET	Median SGP: ACTUAL	Met target?
Math	42 - 51	71	Exceeded
ELA	42 - 51	67	Exceeded

### College and Career Readiness

Chronic Absenteeism		
% Chronically Absent: TARGET	% Chronically Absent: ACTUAL	Met target?
25% - 34%	44%	Did not meet

Achievement Gap			
Subject	% Proficient High Needs: TARGET	% Proficient High Needs: ACTUAL	Met target?
Math	23% - 32%	36%	Exceeded
ELA	22% - 31%	41%	Exceeded

## II. Value Added

**Goal: Increase teacher use of agreed upon instructional strategies in order to increase student achievement.**

All academic staff will use the eight instructional strategies with fidelity to increase student engagement and maximize instructional time.

This goal outlines a three-phase process:

Phase 1: Design and Agree on Instructional Strategies SY 16-17

Phase 2: Implementation SY 17-18

Phase 3: Monitor and Evaluate SY 17-18

Action	Measurable Outcomes	Lead	Evidence of Completion	Due Date
1. Design and agree on instructional practices to implement in 2017-2018.	<ul style="list-style-type: none"> <li>Classroom expectations</li> <li>Classroom procedures and routines</li> <li>Encouraging expected behavior</li> <li>Discourage inappropriate behavior</li> <li>Active supervision</li> <li>Opportunities to respond</li> <li>Activity sequencing and choice</li> <li>Task difficulty</li> </ul>	Director	List of agreed upon instructional practices	May 30, 2017 (prior to new contract, for background information only)
2. Vertically align instructional practices.	<ul style="list-style-type: none"> <li>Tailor each instructional practice to meet developmental level of students</li> <li>Vertically align practices</li> </ul>	Director and Academic Staff	Statement of completion	May 30, 2017 (prior to new contract, for background information only)
3. Implement instructional practices 1-4	<ul style="list-style-type: none"> <li>Academic staff will implement the first four instructional practices</li> </ul>	Academic Staff	Summary of weekly walk-through observation reports	August 30, 2017 October 30, 2017
4. Conduct weekly Monitoring and Feedback	<ul style="list-style-type: none"> <li>Director will monitor instructional practices 1-4 weekly and provide feedback</li> </ul>	Director	Summary of weekly feedback and observation reports	Aug 30, 2017 October 30, 2017 January 30, 2018 May 30, 2018
5. Implement of instructional practices 5-8	<ul style="list-style-type: none"> <li>Academic staff will implement instructional practices 5-8</li> </ul>	Academic Staff	Summary of weekly feedback and observation reports	Sept 30, 2017 October 30, 2017 January 30, 2018 May 30, 2018
6. Weekly Monitoring and Feedback	<ul style="list-style-type: none"> <li>Director will monitor instructional practices 5-8 weekly and provide feedback</li> </ul>	Director	Summary of weekly feedback and observation reports	Sept 30, 2017 October 30, 2017 January 30, 2018

May 30, 2018

**Update:**

Re: Academic Performance Framework's Value Added task: Value Added action item #3, Implement instructional practices 1-4.

Grades K-6 were instructed to begin iReady testing during the first week of school, with the expectation that we would use this data to create Student Achievement Portfolios, hold Data Conferences with our students, establish goals for growth, and to develop leveled groups of students for Tier 2 and 3 interventions/differentiation. We were able to start looking at school wide data during our third Professional Development/Staff Meeting, where we discussed the implications for RTI.

Student Achievement Folders have been created campus wide. Teachers have created sections for each domain, and are collecting work samples as well as formative/summative assessment data.

In an attempt to standardize data collection at Na Wai Ola, we have created a basic template for teachers to use while holding Data Conferences. Teachers are using this template for iReady Math and ELA results, and are attempting to use it for Words Their Way and Reading A-Z. Teachers report that while setting a 15% growth target can be done with iReady, there are still questions about what this means in terms of reading levels and spelling development (what does it mean to increase your reading level by 15%?). We are finding that in some cases it is more realistic to set a growth target of one grade level.

Grades K-6 have all administered the iReady assessment. Teachers report some difficulty getting the assessment completed because our Internet connectivity is often poor. Students frequently had to reenter their password and student ID numbers, causing delay, and in some cases, no results. We are currently working on retesting those that were absent or those with incomplete scores and expect to have all of our students tested by the 31<sup>st</sup> of August.

Data Conferences with students to discuss diagnostic results have been a huge success. While many teachers found it difficult to meet with each student for an extended period of time, they all felt that the conferences were very meaningful and enjoyed the process.

The first four instructional practices have been implemented school wide. All classrooms have established meaningful classroom expectations, which are clearly posted and stated with Aloha. Classroom procedures and routines have been established for the classroom, playground, and Piko. Teachers are encouraging expected behavior using positive discipline techniques and discouraging inappropriate behavior by using a Hawaiian cultural tool we developed called Na'au Pono? This tool is designed to help students better understand their decisions, and the natural consequences that follow.

Re: Academic Performance Framework's Value Added task: Value Added action item #3, Implement instructional practices 5-8.

Now that grades K-6 have completed their iReady testing, have created Student Achievement Portfolios to hold Data Conferences with students, and have established goals for student growth,

teachers have begun to increase active supervision, increase opportunities to respond, reconsidered activity sequencing and choice, and increase task difficulty as a primary way to strengthen our tier 1 interventions.

The main way these four strategies have been implemented on Na Wai Ola’s campus has been to include Rtl into all academic subjects by introducing and better managing small group work. In the past, a majority of our academic staff relied heavily on whole group instruction, which limited the amount of active supervision done, limited the students’ opportunities to respond, limited activity sequencing and choice, and did not always provide task difficulty or enrichment for students performing at or above grade level.

Teachers are working with EA’s to create different grouping structures (mixed ability groups; similar ability groups; independent groups; and instructional groups) to respond to the multiple ability levels of our student body with success. The basic structure of each core academic block starts with whole group instruction (15 min) to ensure that all students have access to grade level standards. After whole group instruction takes place, students break into groups for targeted instructed in their area of need. These groups meet and rotate every 15 to 20 minutes (45 min – 60 min), meeting with both the teacher and the EA. Grouping structures change based on the task, with some grouping based on similar ability and some based on mixed ability. After the groups have met for targeted instruction, our teachers bring them back together for some kind of exit slip/assessment (15 min). The purpose of the exit slip is for the teacher to measure whether or not the objective was met, and by whom. Teachers then take this information to better plan for tomorrow’s interventions, and to track the success/duration of the intervention.

I have done weekly walkthroughs to monitor progress with our instructional practices 5-8, and have found that teachers and EA’s are responding in different, but creative ways. Our work is now to standardize and vertically align these practices to reduce the variability among grade levels. We are excited to invite Connie Herbert, the author of Response to Intervention, Continuous School Improvement, to our campus October 17<sup>th</sup> and 18<sup>th</sup>, and have asked her to visit classrooms and to give us feedback on our progress. She will also provide a professional development that week on implementing Rtl and CSI.

<b>Value Added</b>	
Evidence for school year 2017-2018:	<ul style="list-style-type: none"> <li>• Narrative updates on the implementation of the eight identified instructional strategies (Actions 3 and 5).</li> <li>• Weekly classroom walk-through observation reports for all classrooms at the school that focus on the eight identified instructional strategies (Actions 4 and 6).</li> </ul>
Status:	<p>Completed Value Added activities.</p> <p>Because this Value Added goal is only one year long, the school is developing a new Value Added Measure for the remainder of its contract term.</p>

### III. Interim Targets

Na Wai Ola uses the i-Ready Adaptive Diagnostic Assessment in Math and Reading as a universal screener for grades K-6. The i-Ready Diagnostic identifies areas in which areas students are struggling, measures growth, and supports data-driven differentiated instruction. I-Ready will guide Na Wai Ola leadership with establishing non-negotiable instructional practices, curriculum, and professional development needs. i-Ready will also be the basis for the Na Wai Ola Multiple-Tiered Student Support (MTSS) Implementation Plan.

**GOAL 1:** 80% of Na Wai Ola students in grades K-6 who are enrolled in school during the pre and post assessment administration will increase their i-Ready Math Pre- to Post- assessment score by 15% in SY17-18.

**GOAL 2:** 80% of Na Wai Ola students in grades K-6 who are enrolled in school during the pre and post assessment administration will increase their i-Ready Reading Pre- to Post- assessment score by 15% in SY17-18.

Action	Measurable Outcomes	Lead	Evidence of Completion	Due Date
1. Administer i-Ready assessments to all students in grades k-6	100% of students in grades K-6 have valid screened results in math and reading	Director	iReady reports	August 30, 2017
2. Create student portfolios to track student achievement	100% of students in grades K-6 have student achievement portfolios	Staff	Student achievement folders	August 30, 2017
3. Hold data conferences with students to discuss diagnostic results and to create individualized goal sheets	100% of students in grades K-6 have established goals for growth	Academic Staff	Individualized goal sheets	August 30, 2017
4. Share student data with parents	100% of parents of students in grades K-6 have been notified of Fall diagnostic results and growth goals	Academic Staff	Parent notification letters, back-to-school sign in sheets	September 30, 2017
5. Create incremental schoolwide goals	Schoolwide goals tied to lessons completed or growth, or both, have been established	MTSS Team	Schoolwide goal sheet	September 30, 2017
6. Teachers develop action plan for individual	100% of teachers have completed grade-level action	Teachers	Teacher targeted	September

Action	Measurable Outcomes	Lead	Evidence of Completion	Due Date
and group instruction to target student areas of need	plan template using Fall Window data (diagnostic results)		instruction action plans	30, 2017
7. Administer progress monitoring mini-assessment to students receiving Tier 2/3 supports	100% of all students receiving Tier 2/3 supports in grades K-6 have completed progress monitoring assessments	Academic Staff	Semester summary of iReady reports	January 15, 2018 May 30, 2018
8. Monthly data analysis/progress monitoring meeting	Data/Progress is discussed and analyzed at monthly MTSS fidelity check meeting	MTSS Lead	Meeting agenda, notes, minutes	October 15, 2017 January 30, 2017 March 30, 2017 May 30, 2017
9. Update student portfolios to track student achievement	100% of students in grades K-6 have updated data in their student achievement portfolios	Academic Staff	Student portfolio review by Commission staff or statement of completion	December 30, 2017
10. Hold data conferences with students to discuss diagnostic results and to update individualized goal sheets	100% of students in grades K-6 have updated goals for growth	Academic Staff	Individualized goal sheets	December 30, 2017
11. Share student data with parents	100% of parents of students in grades 1-6 have been notified of Winter/Spring diagnostic results and growth goals/results	Academic Staff	Parent notification letters/state ment of completion	December 30, 2017
12. Update incremental schoolwide goals, as needed	School wide goals tied to lessons completed or growth, or both, have been updated, if needed.	MTSS Team	Updated school wide goal sheet, if needed.	December 30, 2017
13. Teachers update action plan for individual and group instruction to	100% of teachers have completed grade level action plan template using	Teachers	Teacher targeted instruction	January 30, 2018

Action	Measurable Outcomes	Lead	Evidence of Completion	Due Date
target student areas of need	Winter/Spring window data		action plans	

Interim Assessment			
Subject	% of students in grades K-6 increasing i-Ready score by 15% during SY1718: TARGET	% of students in grades K-6 increasing i-Ready score by 15% during SY1718: ACTUAL	Met target?
Reading	80%	<i>Data not available at time of reporting</i>	N/A
Math	80%	<i>Data not available at time of reporting</i>	N/A

## Financial Performance Framework

### Financial Performance Framework Audited Fiscal Year 2017-18 Risk Assessment Result

#### Formula

$$(Current\ Ratio \times 0.10) + (Unrestricted\ Days\ Cash \times 0.35) + (Debt\ to\ Asset\ Ratio \times 0.10) + (Cash\ Flow \times 0.10) + (Total\ Margin \times 0.25) + (Budget\ Variance \times 0.10) = Final\ Risk\ Assessment\ Score$$

The individual indicators and final risk assessment results are represented as one of five categories based on the school’s risk assessment calculations and are rounded to the nearest whole number.

Low	Acceptable	Moderate	High	Significant
1	2	3	4	5

Na Wai Ola (Waters of Life) Public Charter School

$$(1 \times 0.10) + (2 \times 0.35) + (2 \times 0.10) + (2 \times 0.10) + (3 \times 0.25) + (5 \times 0.10) = 2$$

$$0.10 + 0.70 + 0.20 + 0.20 + 0.75 + 0.50 = 2.45 \text{ (Rounded Down) } = 2$$

Final Fiscal Year 2017-18 Risk Assessment: ACCEPTABLE



## Organizational Performance Framework

For the 2017-2018 school year, the Organizational Performance Framework monitored eight indicators to verify compliance on requirements and performance under the framework.

School	List of Key School Employees/Contacts	Uniform Information Practices Act Annual Log	Governing Board Membership Roster	Teacher Licensure Task - Commission	Student Admission Packet Material for Upcoming Student Application Period	Uniform Information Practices Act Semi-annual Summary Log	Annual Fire Inspection Report	Statement of Assurances
<b>Na Wai Ola Public Charter School</b>	✓	✓	✓	✓	✓	✓	✓	X

**Exhibit 4**  
**Letter to Nā Wai Ola Public Charter School**  
**January 4, 2019**

DAVID Y. IGE  
GOVERNOR



JOHN S. S. KIM  
CHAIRPERSON

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

<http://CharterCommission.Hawaii.Gov>  
1111 Bishop Street, Suite 516, Honolulu, Hawaii 96813  
Tel: (808) 586-3775 Fax: (808) 586-3776

January 4, 2019

VIA E-MAIL: [mpostler@nawaiolapcs.org](mailto:mpostler@nawaiolapcs.org)

Melissa Postler, Governing Board Chair  
Nā Wai Ola Public Charter School  
18-1355 Volcano Highway  
Mountain View, HI 96771

RE: Nā Wai Ola Public Charter School Response to Notice of Concern (NOC) #1819AFO01 School Year 201-2018 Frameworks Results and 2018-2019 Site Visit and Complaints from Former Nā Wai Ola Employees

Dear Chair Postler:

This letter serves to provide you with an update on the status of the NOC #1819AFO01 School Year 2017-2018 Frameworks Results and 2018-2019 Site Visit and to inform you of complaints that the Commission has received about Nā Wai Ola Public Charter School from former school employees.

**NOC #1819AFO01 School Year 201-2018 Frameworks Results and 2018-2019 Site Visit**

In accordance with Section 302D-17, HRS and through Exhibit D, Intervention Protocol of the Charter Contract, the Commission sent you NOC #1819AFO01 for Nā Wai Ola’s Framework Results for School Year 2017-2018 and the 2018-2019 Site Visit on December 3, 2018. Per the Intervention Protocol, the Nā Wai Ola governing board was required to provide a written response to the Commission within 14 calendar days of the NOC, on December 17, 2018.

Thank you for the detailed response to the NOC submitted to the Commission by the Nā Wai Ola Public Charter School governing board on December 18, 2018. The Commission staff has reviewed the response and determined that the governing board has not addressed all of the areas of concern; therefore, as noted in the table below, additional information is required (i.e., evidence of implementation, a corrective action plan that fully addresses the concern).

NOC #1819AFO01		
Performance Framework Results for School Year 2017-2018		
Notice of Concern	School Response	Additional Information Required?
Academic Performance Framework		
<ul style="list-style-type: none"> <li>College and Career Readiness: Chronic Absenteeism</li> </ul>	None	Additional information is required as the corrective action plan does not address chronic absenteeism
Organizational Performance Framework		
<ul style="list-style-type: none"> <li>Statement of Assurances</li> </ul>	None – this was not addressed in the school’s written response, however the compliance issue has been remedied via a submittal to the Epicenter system.	No additional information is required, item is closed

Site Visit Report Issued on November 30, 2018		
Notice of Concern	School Response	Additional Information Required?
Academic Performance Framework		
<ul style="list-style-type: none"> <li>Section 4.2 The material elements of the School's Educational Program, including but not limited to the School's mission and vision statements, are as set forth in <u>Exhibit A</u> to this Charter Contract. The School shall, at all times, operate in a manner consistent with its Educational Program as defined in <u>Exhibit A</u>. Revisions to any of the elements in <u>Exhibit A</u> (such as establishing, creating, or expanding a virtual or blended learning programs or expanding or eliminating a division) shall be considered a material change to the Charter Contract and shall require prior written approval by the</li> </ul>	Submitted a corrective action plan	Additional information is required as the corrective action plan does not address the school’s implementation of the specified contract sections, specifically, the following portions of Section 4.2 Material Elements of Educational Program: <ul style="list-style-type: none"> <li>Essential Term #2</li> <li>Essential Term #3</li> </ul>

Site Visit Report Issued on November 30, 2018		
Notice of Concern	School Response	Additional Information Required?
<p>Commission. Where appropriate, this approval shall be informed by an analysis of the School's performance on the Performance Frameworks under Section 5.1 of this Charter Contract particularly to the extent that such changes are intended to improve educational outcomes. (Attachment 2 pp. 41,43)</p>		
<b>Financial Performance Framework</b>		
<ul style="list-style-type: none"> <li>Section 6.1 The School shall maintain accurate and comprehensive financial records, practice governmental accounting in accordance with Generally Accepted Accounting Principles, and use public funds in a fiscally responsible manner. (Attachment 2 pp. 35,37)</li> </ul>	<p><i>NWO has retroactively gained approval for any transactions that fell outside of the school's existing policies. The School Interim Business Manager incorrectly reported that NWO had multiple Debit Cards. The only card in existence is carried by the schools Director (Jason Wong). A copy of NWO's Fiscal policies and procedures were provided to the Interim Business Manager.</i></p>	<p>Additional documentation required. Submit a complete record of all itemized bank statements for any bank accounts associated with Na Wai Ola Public Charter School for fiscal year 2018-2019.</p>
<ul style="list-style-type: none"> <li>Section 6.3 Pursuant to Sections 302D-25(b) and 302D-12(d), HRS, the School and its Governing Board shall be exempt from Chapter 103D, HRS. However, the School's Governing Board shall develop and adhere to a policy for the procurement of goods, services, and construction</li> </ul>	<p><i>NWO has retroactively gained approval for any transactions that fell outside of the school's existing policies. The School Interim Business Manager incorrectly reported that NWO had multiple Debit Cards. The only card in existence is carried by the</i></p>	<p>Additional documentation required. Submit copies of all documents related to retroactive approval for any fiscal transactions or procurement for the School including dates of procurement and retroactive approval, and names and job titles of all those granting retroactive approval for any fiscal transactions. All supporting documents, including receipts, purchase orders,</p>

Site Visit Report Issued on November 30, 2018		
Notice of Concern	School Response	Additional Information Required?
<p>consistent with the goals of public accountability and public procurement practices. The policy shall be readily accessible from the School's website. (Attachment 2 pp. 35,37)</p>	<p><i>schools Director (Jason Wong). A copy of NWO's Fiscal policies and procedures were provided to the Interim Business Manager.</i></p>	<p>purchase requisitions, and invoices should be included.</p>
<ul style="list-style-type: none"> <li>Section 6.4 The School's Governing Board shall develop and adhere to a policy for the School's financial management that shall be readily accessible from the School's website, as described in Section 8.9. This policy shall allow the School to maintain appropriate governance and management procedures and financial controls which shall include, but not be limited to: a. Budgets; b. Accounting policies and procedures; c. Payroll procedures; d. Financial reporting; and e. Internal control procedures for receipts, disbursements, purchases, payroll, inventory, and fixed assets. (Attachment 2 p. 38)</li> </ul>	<p><i>Fiscal Policies and Procedures have been reviewed with Interim Business Manager and are being observed.</i></p>	<p>Additional documentation required. See above.</p>
Organizational Performance Framework		
<ul style="list-style-type: none"> <li>Section 7.3 The school shall comply with its admission policies and procedures as approved by the Commission and</li> </ul>	<p><i>Jason Wong is currently in the process of ensuring that NWO's Admissions Policy is approved by the Charter School</i></p>	<p>Additional action is required as Na Wai Ola is still out of compliance as of 1/4/2019. The school's admissions policy was not accessible from the school's website:</p>

Site Visit Report Issued on November 30, 2018		
Notice of Concern	School Response	Additional Information Required?
<p>these policies and procedures shall be readily accessible from the School's website, as described in Section 8.9 of this Charter Contract. (Attachment 2 pp. 30,32)</p>	<p><i>Commission, and will submit a proposal for approval by December 21, 2018. Our Non-approved Admissions Policy will be removed by December 19, 2018.</i></p>	<p><a href="https://nawaiolapcs.org/ohana/policies-procedures/attachment/admissions-policy-procedures/">https://nawaiolapcs.org/ohana/policies-procedures/attachment/admissions-policy-procedures/</a></p>
<ul style="list-style-type: none"> <li>Section 8.8 The School may provide its own transportation services, provide transportation through an agreement or contract with a private provider, or access any other school transportation provided to it by law. Pursuant to Section 286-181, HRS, any transportation services provided by the School shall follow the safety rules and standards relating to school vehicles, equipment, and drivers adopted by the Department of Transportation. (Attachment 2 p. 22)</li> </ul>	<p><i>Jason Wong is currently in the process of ensuring transportation services meet the necessary requirements. These will be met January 31, 2019.</i></p>	<p>Additional information is needed in the Corrective Action Plan. Please submit a Corrective Action Plan that includes each action within the school's plan to bring Na Wai Ola into compliance with transportation requirements. For example, the school's response states that Jason is currently in the process but what is the school's "process"? What are each of the steps that the school is currently taking? What are the target dates or timeline for each step? Besides Jason, are others involved? If so, what steps are they assigned to?</p>
<ul style="list-style-type: none"> <li>Section 8.9 The School shall make the current versions of the following policies and procedures</li> </ul>	<p><i>Jason Wong is currently in the process of ensuring that NWO's Admissions Policy is approved by the Charter School</i></p>	<p>See reference to Section 7.3 above</p>

Site Visit Report Issued on November 30, 2018		
Notice of Concern	School Response	Additional Information Required?
<p>readily accessible from its website:</p> <p>a. Admissions policies and procedures, as described in Section 7.3 of this Charter Contract. (Attachment 2 pp. 30,32)</p>	<p><i>Commission, and will submit a proposal for approval by December 21, 2018. Our Non-approved Admissions Policy will be removed by December 19, 2018.</i></p>	
<ul style="list-style-type: none"> <li>Section 12.3 Pursuant to Section 302A-804, HRS, the School shall hire licensed teachers that meet the applicable State licensing requirements consistent with federal law and requirements, State law, and collective bargaining agreements, as such requirements may be amended. (Attachment 2 p. 25)</li> </ul>	<p><i>Inactive Licenses have been resolved</i></p>	<p>Additional documentation is required. If the compliance issue has been completely remedied, submit evidence of such remedy. Please submit any correspondence from HTSB that the two teachers that did not have active licenses are now cleared with HTSB.</p>
<ul style="list-style-type: none"> <li>Section 12.7 The School shall conduct criminal history checks, administered by the Hawaii Criminal Justice Data Center in accordance with Section 846-2.7, HRS, solely for the purpose of determining whether a prospective employee or agent is suitable for working in close proximity to children. All such decisions shall be subject to applicable federal laws and regulations currently or hereafter in effect. The School may terminate the</li> </ul>	<p><i>NWO has conducted criminal history checks and has access to the results</i></p>	<p>Additional documentation is required. If the compliance issue has been completely remedied, submit evidence of such remedy. There were thirteen new hires in 2018. Please submit evidence that the history checks have been conducted for these employees: Starr Pascual, John Livsey, Carrie Soo Hoo, Ha'aheo Kaohi, Bonnie Stebbins, and James Nolen. The evidence should not include any confidential or protected information (for example, do not submit the actual history report, social security numbers, etc.)</p>



Site Visit Report Issued on November 30, 2018		
Notice of Concern	School Response	Additional Information Required?
employment of any employee or deny employment to an applicant if the person has been convicted of a crime, and if the School finds by reason of the nature and circumstances of the crime that the person poses a risk to the health, safety, or well-being of children. (Attachment 2 pp. 3-4)		

Please submit the requested documentation noted in the above table to [frameworks.compliance@spcsc.hawaii.gov](mailto:frameworks.compliance@spcsc.hawaii.gov) by 4:30 pm on January 11, 2019. At a public meeting during the week of January 21, 2019, the Commission will review, and may take action on the fulfillment of the this Notice of Concern. Commission staff will contact you when a Commission meeting date has been set.

**Complaints from former Nā Wai Ola Public Charter School employees**

The Hawaii State Public Charter School Commission has received two official complaints regarding Na Wai Ola Public Charter School. Ordinarily we would inform the complainant that the School’s Governing Board is the appropriate avenue to express their concerns, however, it has come to our attention that the School’s Governing Board has not afforded the complainants the opportunity to have these issues placed on the Board’s meeting agenda for review and action. As the nature of the two complaints overlap, both are being addressed together.

I. Authority

As the authorizer of Na Wai Ola Public Charter School and pursuant to Hawaii Revised Statutes, §302D-5, the Commission as the Authorizer, is responsible for monitoring, in accordance with charter contract terms, the performance and legal compliance of public charter schools. The Commission is also responsible for and ensures the compliance of a public charter school it authorizes with all applicable state and federal laws, including reporting requirements.

Under HRS §302D-17, the Commission has the duty of ongoing oversight and corrective actions and shall continually monitor the performance and legal compliance of the public charter schools it oversees, including collecting and analyzing data to support ongoing evaluation according to the charter contract. The Commission has the authority to conduct or require oversight activities that enable the Commission to fulfill its responsibilities under this chapter, including conducting appropriate inquiries and investigations, so long as those activities are consistent with the intent of HRS Chapter 302D and adheres to the terms of the charter contract.

Should the Commission find that a public charter school's performance or legal compliance appears unsatisfactory, the Commission shall promptly notify the public charter school of the perceived problem and provide reasonable opportunity for the charter school to remedy the problem, unless the problem warrants revocation in which case the revocation time frames set forth in section 302D-18 shall apply. Additionally, notwithstanding section 302D-18, that allows the Commission to revoke the Charter Contract, to the contrary, the Commission shall have the authority to take appropriate corrective actions or exercise sanctions short of revocation in response to apparent deficiencies in public charter school performance or legal compliance. Under HRS 302D-17, such actions or sanctions may include, if warranted:

- (1) Requiring a school to develop and execute a corrective action plan within a specified time frame; and
- (2) Reconstituting the governing board of the charter school; provided that the following conditions are met:
  - (A) Reconstitution occurs only under exigent circumstances, including the following:
    - (i) Unlawful or unethical conduct by governing board members;
    - (ii) Unlawful or unethical conduct by the charter school's personnel that raises serious doubts about the governing board's ability to fulfill its statutory, contractual, or fiduciary responsibilities; and
    - (iii) Other circumstances that raise serious doubts about the governing board's ability to fulfill its statutory, contractual, or fiduciary responsibilities;
  - (B) The authorizer shall replace up to, but no more than, the number of governing board members necessary so that the newly appointed members constitute a voting majority in accordance with the governing board's by-laws; except that the authorizer may replace the entire governing board if the alternative is the initiation of revocation of the charter school's charter contract and the governing board opts instead for reconstitution; and
  - (C) Reconstitution occurs in accordance with processes set forth by the authorizer that provide the charter school's personnel and parents with timely notification of the prospect of reconstitution.

While some issues have been covered by the Commission's Notice of Concern issued on December 03, 2018, other allegations of possible Charter Contract Violations remain.

## II. Complaints

On May 17, 2017, Ms. Karen Basham submitted a Formal Notification to the Fiscal and Governing Board Chair of Nā Wai Ola requesting an investigation into the administrative staff, in particular naming Dara Makaiwi, Registrar, Lore-lin Makaiwi, Dean of Students, and Jason Wong, Director of Nā Wai Ola. In her complaint to the Governing Board Ms. Basham listed 15 alleged infractions which prevented her from performing her job duties and affected the best interest of the school.

On September 07, 2018, Ms. Basham submitted another complaint to the Governing Board listing 14 grievances and submitted a copy of this submittal along with a file to the Commission requesting an investigation.

On November 01, 2018, Mary Quijano submitted a complaint to our office specifically addressing the Governing Board's lack of action in addressing Ms. Basham's previous complaints, as well as a lack of governance by the Board allegedly resulting in the mismanagement of the school.

### III. Possible Charter Contract Violations

In addition to the sections cited by the December 03, 2018, Notice of Concern, the following provisions in the Charter Contract may have been violated based on the complaints submitted by Karen M. Basham and Mary Quijano:

2.5 Compliance with Laws: The School and the Commission shall comply with all applicable federal, State, and city and county laws, ordinances, codes, rules, and regulations, as the same may be amended from time to time.

3.2 State Code of Ethics and Code of Conduct: The School's Governing Board and employees shall comply with the State Code of Ethics, codified in Chapter 84, HRS. The School's Governing Board, employees, contractors, and volunteers shall also comply with the Code of Conduct developed and implemented by the Commission, as required in BOE Policy 201-1, as may be amended.

8.6 Complaints Process: The School shall adopt and adhere to a process for resolving public complaints which shall include an opportunity for complainants to be heard by the School's Governing Board. For matters concerning the operations and administration of the School, the decision by the School's Governing Board shall be considered final, except where the complaint pertains to a possible violation of any law or breach of this Charter Contract. In the case of a possible violation of law or breach of the Charter Contract, the Commission or other appropriate state agency may investigate the validity of the complaint to determine whether additional actions are needed. The complaints process shall be readily accessible from the School's website, as described in Section 8.9, of this Charter Contract.

9.1 Safe Environment: The School shall maintain a safe learning environment at all times. The School shall develop and adhere to a safety plan, which shall be readily accessible from the School's website, as described in Section 8.9 of this Charter Contract.

9.3 Student Health: The School shall provide appropriate first aid care for ill and injured students. The School may recommend that parents seek the help of medical professionals or appropriate health agencies for cases beyond its scope of responsibility.

12.2 Nondiscrimination: The School, including any employees or agents of the School, shall not engage in any discrimination that is prohibited by any applicable federal, State, or city and county law, including but not limited to Section 378-2, HRS.

Melissa Postler, Governing Board Chair

Page 10

January 4, 2019

12.6 Non-Instructional Employees: The School shall ensure that the School's non-instructional employees or agents are experienced and fully qualified to engage in the activities and perform the services required under this Charter Contract, and that all applicable licensing and operating requirements imposed or required under federal, State, or city and county laws, and all applicable accreditation and other standards of quality generally accepted in the field of the activities of such employees and agents are complied with and satisfied, as well as any applicable collective bargaining agreements.

While the Commission does not review or overturn policy decisions by a Governing Board, we do focus on alleged violations of law, the school's Charter Contract, and ethics rules. At this time, we are requesting that you please submit written correspondence concerning the complainants' allegations and a copy of the agenda and minutes where the aforementioned complaints are properly addressed by the Governing Board. Failure to do so may result in the issuance of additional Notices of Concern. Please submit the requested documentation to [frameworks.compliance@spcsc.hawaii.gov](mailto:frameworks.compliance@spcsc.hawaii.gov) by 4:30 PM on January 11, 2019.

Thank you for your attention to this matter.

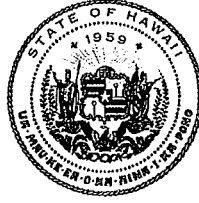
With aloha,

A handwritten signature in cursive script that reads "Sione Thompson". The signature is written in black ink and is positioned above the typed name and title.

Sione Thompson  
Executive Director

c: Jason Wong, School Director (via email: [jwong@nawaiolapcs.org](mailto:jwong@nawaiolapcs.org))

**Exhibit 5**  
**Nā Wai Ola Public Charter School**  
**NOC Response #1**



STATE OF HAWAII  
STATE PUBLIC CHARTER SCHOOL COMMISSION  
(‘AHA KULA HO‘ĀMANA)  
1111 Bishop Street, Suite 516, Honolulu, Hawaii 96813  
Tel: (808) 586-3775 Fax: (808) 586-3776

## RESPONSE TO NOTICE OF CONCERN FORM

NOC #: 1819AFO01

Sent to Governing Board Chair of Na Wai Ola Public Charter School on December 03, 2018

**Response Deadline: December 17, 2018**

On behalf of Na Wai Ola Public Charter School, I, Melissa Postler, the school’s governing board chair, hereby affirm:

**Option 1:** The issue of concern was completely remedied by the response deadline.

Included below is:

- A description of the remedy (*e.g.*, school staff uploaded the required documents to Epicenter)

**Option 2:** The issue of concern was not completely remedied by the deadline, but the remedy is currently in progress.

Included below is:

- A description of the corrective action plan designed to remedy the issue of concern
- A timeline and deadline for each action within the plan
- The person(s) responsible for each action within the plan

**Option 3:** The school governing board would like to dispute the issue of concern.

Included below is:

- A description of the dispute with the issue of concern
- Evidence supporting the school governing board’s disagreement with the issue (*if necessary, please attach additional documentation*)

**Description of the remedy, corrective action plan, or dispute for the issue of concern and other required information, as outlined above:**

*I am aware that the issue of concern will be escalated to the Commission for consideration at a general business meeting if the school governing board fails to do any of the following:*

- *Respond to the Notice by the deadline using one of the options listed above.*
- *Submit a corrective action plan that is mutually agreeable to both the school governing board and Commission staff.*
- *Make progress toward remedying the issue of concern according to the accepted corrective action plan.*

*I also understand that the Executive Director's Report to the Commission during general business meetings shall include de-identified updates on issued Notices of Concern, remedies, and implementation of approved corrective action plans.*

*Melissa Postler*

Signature

Governing Board Chair, Na Wai Ola Public Charter School

*12/17/18*

Date



# Nā Wai Ola Public Charter School

18-1355 Volcano Road · P.O. Box 711539, Mountain View, HI 96771

Telephone: (808) 968-2318 · Fax: (808) 968-0778

E-mail: [info@nawaiolapcs.org](mailto:info@nawaiolapcs.org) Website: [www.nawaiolapcs.org](http://www.nawaiolapcs.org)

December 17, 2018

Re: NOC #: 1819AF001

Notice of Concern: Section 12.7 - Background checks.

- NWO has conducted criminal history checks and has access to the results

Notice of Concern: Section 8.8 - School Transportation

- Jason Wong is currently in the process of ensuring transportation services meet the necessary requirements. These will be met January 31, 2019.

Notice of Concern: Section 12.3 – Licensed Teachers

- Inactive Licenses have been resolved

Notice of Concern: Section 7.3 and 8.9 – Admission's Policy

- Jason Wong is currently in the process of ensuring that NWO's Admissions Policy is approved by the Charter School Commission, and will submit a proposal for approval by December 21, 2018. Our Non-approved Admissions Policy will be removed by December 19, 2018.

Notice of Concern: Section 6.1 and 6.3 – Fiscal Responsibilities and Procurement

- NWO has retroactively gained approval for any transactions that fell outside of the school's existing policies.
- The School Interim Business Manager incorrectly reported that NWO had multiple Debit Cards. The only card in existence is carried by the schools Director (Jason Wong).
- A copy of NWO's Fiscal policies and procedures were provided to the Interim Business Manager.

Notice of Concern: Section 6.4 – Fiscal Policies and Procedures

- Fiscal Policies and Procedures have been reviewed with Interim Business Manager and are being observed.

Notice of Concern: Section 4.2 – Mission and Vision

- Updated Mission and Vision will be included in NWO's contract renewal application by Jason Wong.

Jason Wong



**Exhibit 6**  
**Letter to Nā Wai Ola Public Charter School**  
**NOC Response #2**



# Nā Wai Ola Public Charter School

18-1355 Volcano Road · P.O. Box 711539, Mountain View, HI 96771

Telephone: (808) 968-2318 · Fax: (808) 968-0778

E-mail: [info@nawaiolapcs.org](mailto:info@nawaiolapcs.org) Website: [www.nawaiolapcs.org](http://www.nawaiolapcs.org)

January 10, 2019

Re: NOC #: 1819AF001

#### Notice of Concern: Chronic Absenteeism

- Na Wai Ola has identified Chronic Tardiness and Chronic Absenteeism as one of its root causes in our Comprehensive needs Assessment and School-Wide Plan. Attached is NWO's School-Wide Plan.

#### Notice of Concern: Section 4.2 – Essential Terms 2 and 3

- Essential Terms #2 and #3 have been changed in its entirety. Please refer to Na Wai Ola's Contract Renewal Application.

#### Notice of Concern: Section 12.7 - Background checks.

- NWO has conducted criminal history checks and has access to the results. Attached are the results for Starr Pascual, John Livsey, Carrie Soo Hoo, Ha'aheo Kaohi, Bonnie Stebbins, and James Nolen.

#### Notice of Concern: Section 8.8 - School Transportation

- Attached is a Corrective Action Plan to bring Na Wai Ola's transportation into compliance.

#### Notice of Concern: Section 12.3 – Licensed Teachers

- Inactive Licenses have been resolved. Attached are the HSTB search results for Ashley Malama-Poplardo, Carrie Soo Hoo, Bonnie Stebbins, Shane Sigetic, and Richard Gramlich.

#### Notice of Concern: Section 7.3 and 8.9 – Admission's Policy

- Attached is NWO's Admission's Policy as well as a letter to the Charter School Commission asking for review and approval.

#### Notice of Concern: Section 6.1 and 6.3 – Fiscal Responsibilities and Procurement

- NWO has retroactively gained approval for any transactions that fell outside of the school's existing policies. Attached are all transactions that needed approval.

Jason Wong




HAWAII STATE PUBLIC CHARTER SCHOOLS  
**TITLE I SCHOOLWIDE PLAN**

SY 2017-2018, 2018-2019, 2019-2020

*Prepared in collaboration with the Hawaii State Public Charter School Commission*

School: Nā Wai Ola Public Charter School  
 School Address: 18-1355 Volcano Highway (PO Box 711539) Mt. View, HI 96771  
 School Phone Number: (808) 968-2318  
 School Website: [www.nawaiolapcs.org](http://www.nawaiolapcs.org)

**Submitted by Jason Wong**  
 Principal's Signature:  Signature Date: 6/12/18

**Approved by Renee Bellinger**  
 Local School Board Chair's Signature:  Signature Date: 6/12/18

**Acknowledged by Charter School Commission's Executive Director**  
 Executive Director's Signature: \_\_\_\_\_ Signature Date: \_\_\_\_\_

**Received by HIDOE – School Transformation Branch**  
 STB Director's Signature: \_\_\_\_\_ Signature Date: \_\_\_\_\_

# Hawaii State Public Charter Schools: Title I Schoolwide Plan SY 2017-2018, 2018-2019, 2019-2020

In Collaboration with the Hawaii State Public Charter School Commission

## Where are we now?

List your school's prioritized needs as identified in one or more of the following needs assessments:

- Comprehensive Needs Assessment (Title I Schools)
- WASC Self Study
  - WASC Category B: Standards Based Student Learning: Curriculum, instruction
  - WASC Category C: Standards Based Student Learning: Instruction
  - WASC Category D: Standards Based Student Learning: Assessment and Accountability
- International Baccalaureate (IB) Authorization
- Other

Then, based on the analysis you performed in the CNA, list the contributing or root causes as well as a citation for what page of the CNA contains more information on the listed need.

Needs	Contributing or Root Cause(s)	Pg. # in CNA
High rate of tardiness and absenteeism	Over 90% of parents report that their child is "usually" out due to being ill/sick; records show that students are mainly tardy because "woke up late," as we have seen absenteeism drop over the last year, we have also seen tardiness rise.	Pgs. 6-15
ELA Curriculum	With more confidence built through professional development opportunities with our contract hires, implementation of Go Math has been done with fidelity and has more successful this past school years, and the results are showing in our student's test scores; with this now in place, staff are seeking an ELA curriculum or programs/curriculum components which support CCSS in ELA to continue our growth and our student's success.	Pgs. 8-15
Social Emotional Learning Program	NWO has recognized its need for a Social Emotional Learning curriculum for a time now, contributing causes to the delay include scheduling issues in being able to meet current suggested curriculum requirements with fidelity, and what we chose we want to work, as it is a need for our	Pgs. 6-15

# Hawaii State Public Charter Schools: Title I Schoolwide Plan SY 2017-2018, 2018-2019, 2019-2020

*In Collaboration with the Hawaii State Public Charter School Commission*

	<p>population. This year we have seen a rise in reports of “bullying,” we believe, in part, that most of these reports of bullying are evidence of social emotional skills that are lacking within our population- whether that be communication skills, anger management skills, coping strategies, etc.</p>	
<p>School-wide reward program/token economy</p>	<p>This high needs population has had an incredible positive response to a (school-wide) “blue raffle ticket” reward system that was implemented by staff mid-year; in conjunction with SEL, NWO recognizes its need to continue in developing PBIS under our MTSS, but hear and see our student’s need for recognition and reward when they are meeting campus wide expectations, in and out of their classrooms.</p>	<p>Pgs. 8-15</p>
<p><b>Addressing Equity: Sub-Group Identification</b>  <b>In order to address equity, list the targeted sub group(s) and their identified needs. **Specific enabling activities listed in the academic plan should address identified sub group(s) and their needs.</b></p>		
<p>Low SES- high rate of tardiness and absenteeism</p>		

**Hawaii State Public Charter Schools: Title I Schoolwide Plan SY 2017-2018, 2018-2019, 2019-2020**  
*In Collaboration with the Hawaii State Public Charter School Commission*

<b>ORGANIZE: Identify your Leadership Team Accountable Leads.</b>	
<b>Name and Title of Team Accountable Lead</b>	<b>Responsible for implementation of the school's strategies and initiatives</b>
1. Jason Wong, Director	1. Overall responsibility in monitoring and accountability.
2. Lore-Lin Makaiwi, Dean of Students/Title I Coordinator	2. Secondary responsibility in monitoring and accountability; primary responsibility in organizing and facilitating administrative efforts for school-wide improvement actions; initiatives re: SEL, PBI/S, MTSS.
3. Karen Basham, Business Manager	3. Overall fiscal responsibilities.
4. Kapua Francisco, Registrar	4. Hawaiian Cultural Lead; initiatives re: absenteeism and tardiness
5. Mark Fontaine, Special Education teacher	5. Special Education, and Targeted Support and Interventions Lead
6. Anna Aoki, 1 <sup>st</sup> grade teacher	6. Teacher Evaluation and APC Lead
7. Christine Yasuhara, Lead Educational Assistant	7. i-Ready and S.T.R.E.A.M Summer Program Lead
8. Marc Sambueno, Technology Coordinator	8. Technology Lead
9. Lisa Ziaya-Livsey, 2 <sup>nd</sup> grade teacher	9. RtI Lead
10. Jim Nolen, PE teacher	10. SEL support, and School-Wide Token Economy Development Lead

# Hawaii State Public Charter Schools: Title I Schoolwide Plan SY 2017-2018, 2018-2019, 2019-2020

In Collaboration with the Hawaii State Public Charter School Commission

**Goal 1: Student Success.** All students demonstrate they are on a path toward success in college, career and citizenship.

- Objective 1: Empowered** - All students are empowered in their learning to set and achieve their aspirations for the future.
- Objective 2: Whole Child** - All students are safe, healthy, and supported in school, so that they can engage fully in high-quality educational opportunities.
- Objective 3: Well Rounded** - All students are offered and engage in rigorous, well rounded education so that students are prepared to be successful in their post-high school goals.
- Objective 4: Prepared and Resilient** - All students transition successfully throughout their educational experiences.

Outcome: By the end of three years.	Rationale: Explain the link to your CNA/Underlying Cause(s)
Nā Wai Ola’s chronic absenteeism rate will be at, or below, the statewide average.	High rate of chronic absenteeism.
Less than 1% of Nā Wai Ola’s daily population will be tardy.	Chronically tardy students are missing core academic subject, negatively impacting student achievement, growth, and success.
Nā Wai Ola will have a well-defined, implemented, and monitored Multiple-Tiered System of Supports (MTSS) in place for all students.	Additional systems of support are needed, and some have already proven to be successful, though under-developed; Social Emotional Learning Curriculum, and a school-wide token economy, to continue to develop and improve NWO’s Multiple-Tiered Systems of Support.
10% of Nā Wai Ola student’s who scored at a Level 1 or Level 2 on the SBA will move to a proficient level.	In the 17-18 SY, 40% of NWO student’s tested as proficient in ELA, and 36% were proficient in Math; by the end of the SY 18-19, with a 10% movement in the Level 1-2 population, a proficiency percentage of 45% for ELA, and 42% for Math, is expected.

# Hawaii State Public Charter Schools: Title I Schoolwide Plan SY 2017-2018, 2018-2019, 2019-2020

In Collaboration with the Hawaii State Public Charter School Commission

Desired Outcomes	Strategies & Actions	School Year(s) of Activity	Relevant Interim Measures	Accountable Lead(s)	Funding Sources
<p>Based on Strategic Plan Student Success Indicators</p> <p>Nā Wai Ola's chronic absenteeism rate will be at, or below, the statewide average.</p>	<p>How will you achieve your goal? What resources will you leverage?</p> <p>Increase student engagement through strengthening the quality of teaching and supports in all grade levels, continuing the development of NWO's Multiple-Tiered Systems of Support, which will now include a school-wide token economy, and increase out-of-school support for all students, including at-risk groups.</p>	<p>When will this occur?</p> <p>2018 – 2019 SY</p>	<p>How will you know if you are on track to meet your goal? How will you monitor progress?</p> <p>Educational and curriculum coaching, with classroom (observation) monitoring and feedback sessions. Further development of NWO's MTSS; including NWO's [Hawaiian] values based, school-wide, token economy to be implemented at the start of the SY. Family Engagement opportunities that form a stronger academic understanding, and fosters an 'ohana approach towards meeting student success measures.</p>	<p>Who will be leading?</p> <p><b>Lead:</b> Jason Wong Lore-Lin Makaiwi</p> <p><b>Supports:</b> Contract hires. NWO academic staff.</p>	<p>Check applicable boxes to indicate source of funds.</p> <p><input checked="" type="checkbox"/> PP \$ <input checked="" type="checkbox"/> Title I \$ <input type="checkbox"/> Title II \$ <input checked="" type="checkbox"/> Other \$ <input type="checkbox"/> N/A</p>
<p>Less than 1% of Nā Wai Ola's daily population will be tardy.</p>	<p>Required data points around student tardiness will be finalized, i.e., reason for tardy, formula to calculate daily percentages of tardies, and parent accountability measures need to be finalized. Monthly data meetings will be scheduled to review current data.</p>	<p>2018 – 2019 SY</p>	<p>Monthly data meeting results and agenda, minutes, and/or sign-in sheets.</p>	<p><b>Lead:</b> Kapua Francisco</p> <p><b>Supports:</b> NWO staff.</p>	<p><input type="checkbox"/> PP \$ <input type="checkbox"/> Title I \$ <input type="checkbox"/> Title II \$ <input type="checkbox"/> Other \$ <input checked="" type="checkbox"/> N/A</p>



# Hawaii State Public Charter Schools: Title I Schoolwide Plan SY 2017-2018, 2018-2019, 2019-2020

*In Collaboration with the Hawaii State Public Charter School Commission*

<p>Nā Wai Ola will have a well-defined, implemented, and monitored Multiple-Tiered System of Supports (MTSS) in place for all students.</p>	<p>NWO's school leadership team will continue in developing, revising, implementing, and monitoring our MTSS.</p>	<p>SY 2017 – 2018, 2018 – 2019, 2019 – 2020.</p>	<p>MTSS binder. More systems developed and put into place. Adherence to PD plan and schedule.</p>	<p><b>Lead:</b> Jason Wong Lore-Lin Makaiwi</p> <p><b>Supports:</b> Contract hires. NWO academic staff.</p>	<p>PP \$ <input checked="" type="checkbox"/> Title I \$ <input checked="" type="checkbox"/> Title II \$ <input type="checkbox"/> Other \$ <input type="checkbox"/> N/A</p>
<p>10% of Na Wai Ola student's who scored at a Level 1 or Level 2 on the SBA will move to a proficient level.</p>	<p>Increase student engagement through strengthening the quality of teaching in all grade levels, continuing the development of NWO's Multiple-Tiered Systems of Support, which will now include a school-wide token economy, and increase out-of-school support for all students, including at-risk groups, and decrease tardy and absenteeism rates.</p>	<p>2018 – 2019 SY</p>	<p>i-Ready diagnostic, growth monitoring, and SBA prediction data. Educational and curriculum coaching, with classroom (observation) monitoring and feedback sessions.  Further development of NWO's MTSS; including NWO's [Hawaiian] values based, school-wide, token economy to be implemented at the start of the SY.  Family Engagement opportunities that form a stronger academic understanding, and fosters an 'ohana approach towards meeting student success measures.</p>	<p><b>Lead:</b> Jason Wong Lore-Lin Makaiwi</p> <p><b>Supports:</b> Contract hires. NWO academic staff.</p>	<p>PP \$ <input checked="" type="checkbox"/> Title I \$ <input checked="" type="checkbox"/> Title II \$ <input type="checkbox"/> Other \$ <input type="checkbox"/> N/A</p>

# Hawaii State Public Charter Schools: Title I Schoolwide Plan SY 2017-2018, 2018-2019, 2019-2020

In Collaboration with the Hawaii State Public Charter School Commission

**Goal 2: Staff Success.** Nā Wai Ola Public Charter School has a high-performing culture where employees have the training, support and professional development to contribute effectively to student success.

- Objective 1: Focused Professional Development** – Develop and grow employees to support student success and continuous improvement.
- Objective 2: Timely Recruitment and Placement** – Timely recruitment and placement of applicants to better serve all students to address achievement gaps and attain equity.
- Objective 3: Expanded Professional Pipeline-** Expand well-qualified applicant pools for all Hawaii educator positions and expand the number of candidates who are prepared to support student success objectives.

<b>Outcome: By the end of three years,</b>		<b>Rationale: Explain the link to your CNA / Underlying Cause(s)</b>
Educational staff will continue their work with specific contract hires to continue improvement and growth, expand professional skills and strategies, vertical alignment and articulation, instructional coherence, instructional strategies, effective practices, curriculum mapping, increasing depth of knowledge and skills in regards to curriculum and Hawaii State Content and Performance Standards.		For staff success and continued growth, focused professional development opportunities are necessary to continue to build skills and strategies, and expand content knowledge; this will increase student success as measured by SBA, lower NWO’s teacher turnover rate, increase students engagement to lower tardiness and absenteeism percentages.
A professional development plan/schedule will be developed with staff’s needs addressed.		High teach turnover rate. High percentages of student absenteeism. Continued academic growth for NWO’s high needs population (narrowing the performance gaps). Lacking an ELA curriculum.
Utilizing the GVC (Guaranteed and Viable Curriculum) Framework, Nā Wai Ola’s team will develop its ELA curriculum.		Lacking an ELA curriculum.

# Hawaii State Public Charter Schools: Title I Schoolwide Plan SY 2017-2018, 2018-2019, 2019-2020

In Collaboration with the Hawaii State Public Charter School Commission

Desired Outcomes	Strategies & Actions	School Year(s) of Activity	Relevant Interim Measures	Accountable Lead(s)	Funding Sources
<p><i>Based on Strategic Plan Staff Success Indicators</i></p> <p>Educational staff will continue their work with specific contract hires to continue improvement and growth, expand professional skills and strategies, vertical alignment and articulation, instructional coherence, instructional strategies, effective practices, curriculum mapping, increasing depth of knowledge and skills in regards to curriculum and Hawaii State Content and Performance Standards.</p>	<p><i>How will you achieve your goal? What resources will you leverage?</i></p> <p>Continue contract services with Kaholo Daguman; form contract services with Sue Voit.</p>	<p><i>When will this occur?</i></p> <p>2018 – 2019 SY</p>	<p><i>How will you know if you are on track to meet your goal? How will you monitor progress?</i></p> <p>Classroom observation/monitoring through performance evaluation process, and PLC feedback sessions.</p>	<p><i>Who will be leading?</i></p> <p><b>Lead:</b> Jason Wong  <b>Supports:</b> Contract hires.</p>	<p><i>Check applicable boxes to indicate source of funds.</i></p> <p> <input checked="" type="checkbox"/> PP \$  <input checked="" type="checkbox"/> Title I \$  <input type="checkbox"/> Title II \$  <input checked="" type="checkbox"/> Other \$  <input type="checkbox"/> N/A                 </p>

# Hawaii State Public Charter Schools: Title I Schoolwide Plan SY 2017-2018, 2018-2019, 2019-2020

*In Collaboration with the Hawaii State Public Charter School Commission*

<p>A professional development plan/schedule will be developed with staff's needs addressed.</p>	<p>By the end of July 2018, Nā Wai Ola's leadership team will have developed a professional development plan/schedule for the 2018-2019 SY.</p>	<p>2018 – 2019 SY</p>	<p>Scheduled times with appropriate organizations, sign in sheets, and professional development certificates and/or reflection copies, in comparison with the developed plan.</p>	<p><b>Lead:</b> Jason Wong <b>Supports:</b> Academic staff.</p>	<p> <input checked="" type="checkbox"/> PP \$  <input checked="" type="checkbox"/> Title I \$  <input type="checkbox"/> Title II \$  <input checked="" type="checkbox"/> Other \$  <input type="checkbox"/> N/A         </p>
<p>Utilizing the GVC (Guaranteed and Viable Curriculum) Framework, Na Wai Ola's team will develop its ELA curriculum.</p>	<p>Starting in July 2018, the team will start work with contract hire Kaholo Daguman, in forming a viable ELA curriculum for Nā Wai Ola PCS.</p>	<p>2018 – 2019, 2019 – 2020 SY</p>	<p>Integrated into the PD plan/schedule; meeting agenda/sign in sheets; ELA curriculum Framework.</p>	<p><b>Lead:</b> Jason Wong <b>Supports:</b> Contract hires. Academic staff.</p>	<p> <input type="checkbox"/> PP \$  <input checked="" type="checkbox"/> Title I \$  <input type="checkbox"/> Title II \$  <input type="checkbox"/> Other \$  <input type="checkbox"/> N/A         </p>

# Hawaii State Public Charter Schools: Title I Schoolwide Plan SY 2017-2018, 2018-2019, 2019-2020

*In Collaboration with the Hawaii State Public Charter School Commission*

**Goal 3: Successful Systems of Support.** The system and culture of Nā Wai Ola works to effectively organize financial, human, and community resources in support of student success.

- Objective 1: Innovation** – Foster innovation and scaling of effective instructional and operational practices to meet and exceed our educational goals.
- Objective 2: Adequate and Expanded Resources**– Secure adequate resources to support school and community-based plans for student success.
- Objective 3: Efficient and Transparent Supports**- Increase efficiency and transparency of instructional and operational supports to promote student learning and help schools while stewarding public education resources.

<b>Outcome: By the end of three years,</b>		<b>Rationale: Explain the link to your CNA / Underlying Cause(s)</b>
<p>Nā Wai Ola will have a well-defined, implemented, and monitored Multiple-Tiered System of Supports (MTSS) in place for all students.</p>	<p>Additional systems of support are needed, and some have already proven to be successful, though under-developed; specifically a Social Emotional Learning Curriculum, and a school-wide token economy, to continue to develop and improve NWO’s Multiple-Tiered Systems of Support.</p>	<p>High rates of absenteeism and tardiness (student engagement). Higher reported rate of bullying across all perception survey demographics. Increase student achievement and success.</p>
<p>Nā Wai Ola will continue committee work to maintain continuous school improvement.</p>	<p>Committees address all challenge areas for NWO PCS.</p>	<p>Committees address all challenge areas for NWO PCS.</p>

# Hawaii State Public Charter Schools: Title I Schoolwide Plan SY 2017-2018, 2018-2019, 2019-2020

In Collaboration with the Hawaii State Public Charter School Commission

Desired Outcomes	Strategies & Actions	School Year(s) of Activity	Relevant Interim Measures	Accountable Lead(s)	Funding Sources
<p><i>Based on Strategic Plan Successful Systems of Support Indicators</i></p> <p>Nā Wai Ola will have a well-defined, implemented, and monitored Multiple-Tiered System of Supports (MTSS) in place for all students.</p>	<p><i>How will you achieve your goal? What resources will you leverage?</i></p> <p>NWO's school leadership team will continue in developing, revising, implementing, and monitoring our MTSS.</p>	<p><i>When will this occur?</i></p> <p>SY 2017 – 2018, 2018 – 2019, 2019 – 2020.</p>	<p><i>How will you know if you are on track to meet your goal? How will you monitor progress?</i></p> <p>MTSS binder. More systems developed and put into place. Adherence to PD plan and schedule.</p>	<p><i>Who will be leading?</i></p> <p><b>Lead:</b> Jason Wong Lore-Lin Makaiwi</p> <p><b>Supports:</b> Contract hires. NWO academic staff.</p>	<p><i>Check applicable boxes to indicate source of funds.</i></p> <p>PP \$ <input checked="" type="checkbox"/> Title I \$ <input checked="" type="checkbox"/> Title II \$ <input type="checkbox"/> Other \$ <input checked="" type="checkbox"/> N/A <input type="checkbox"/></p>
<p>To meet positive behavioral interventions and supports needs within its MTSS, Nā Wai Ola will develop a school-wide token economy formed around our Na'au Pono school-wide [Hawaiian] values.</p>	<p>Discipline/MTSS committee will meet to formalize token economy plan and finalize with staff. Create, develop, and order posters, tickets, prizes, and any other necessary resources for implementation.</p>	<p>2018 – 2019 SY</p>	<p>Plan formation. Development and ordering of posters, tickets, prizes, and any other necessary resources for implementation. Introduction during beginning of the SY assembly. Implementation during the 2018-2019 SY.</p>	<p><b>Lead:</b> Lore-Lin Makaiwi Jim Nolen</p> <p><b>Supports:</b> NWO staff.</p>	<p>PP \$ <input checked="" type="checkbox"/> Title I \$ <input checked="" type="checkbox"/> Title II \$ <input type="checkbox"/> Other \$ <input checked="" type="checkbox"/> N/A <input type="checkbox"/></p>

## Public Search

Please note: Search results may be limited for licenses issued prior to 2002, when HTSB assumed the responsibility for issuing teaching licenses. If a license was issued prior to 2002, it may not currently appear in the database. Please use caution in identifying a licensee as more than one individual may have the same name. For further information please contact HTSB at 808-586-2600.

Last Name

malama-poplardo

First Name

ashley

Search

Name	License Level	Teaching Field(s)	License Expiration Date
Malama-Poplardo, Ashley	Emergency Hire Permit	Emergency Hire P-12	06/30/2019

Showing 1 to 1 of 1 entries

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## Public Search

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Last Name

soo hoo

First Name

carrie

Search

<b>Name</b>	<b>License Level</b>	<b>Teaching Field(s)</b>	<b>License Expiration Date</b>
Soo Hoo, Carrie	Emergency Hire Permit	Emergency Hire P-12	06/30/2019

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Last Name

stebbins

First Name

bonnie

Search

Name	↓ License Level	↑ Teaching Field(s)	↑ License Expiration Date	↑
Stebbins, Bonnie	Emergency Hire Permit	Emergency Hire P-12	06/30/2019	

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Last Name

First Name

Name	↓ License Level	↑ Teaching Field(s)	↓ License Expiration Date	↑
Sigetic, Shane B	Standard License	Early Childhood Education P-3 Special Education - Mild/Moderate K-12	06/30/2024	

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Last Name

gramlich

First Name

Richard

Search

Name	↓↑	License Level	↑↑	Teaching Field(s)	↓↑	License Expiration Date	↑↑
Gramlich, Richard M.		Standard License		Elementary Education K-6		06/30/2021	

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# Nā Wai Ola Public Charter School

18-1355 Volcano Road · P.O. Box 711539, Mountain View, HI 96771

Telephone: (808) 968-2318 · Fax: (808) 968-0778

E-mail: [info@nawaiolapcs.org](mailto:info@nawaiolapcs.org) Website: [www.nawaiolapcs.org](http://www.nawaiolapcs.org)

January 10, 2019

Re: Admissions Policy and Procedure

To Whom It May Concern:

Attached for review and approval is Na Wai Ola's Admissions Policy and Procedure. Thank you in advance for your time and consideration.

Mahalo,

A handwritten signature in cursive script that reads "Melissa Postler".

Melissa Postler  
Governing Board Chair NWO



# Nā Wai Ola Public Charter School

## ADMISSIONS POLICY & PROCEDURES

### **Intention of the Admission Process**

All haumāna (students) and their ‘ohana (families) who express a desire to attend our school, and are willing to commit to the expressed values of our school are encouraged to apply for enrollment. Our collective values and actions support the purpose, mission, and vision of Nā Wai Ola PCS.

All haumāna and their ‘ohana are encouraged to be active, positive, and contributing members of the Nā Wai Ola PCS learning ‘ohana.

### **Steps to Admission**

The admission process includes a completed written application and a school tour for new haumāna and their ‘ohana. Attendance at one of our school tours is a requirement for admissions. School tours are offered to interested haumāna and their ‘ohana, and will begin during the spring and continue through the summer of the prior school year to the incoming admission school year. At the school tour, ‘ohana are introduced to and informed of the commitment to the Nā Wai Ola PCS mission, vision, and values. ‘Ohana are also given the opportunity to ask questions about the school.

### **Selection**

Provided that there is sufficient space in the designated class/grade, all applicants will be invited to join the Nā Wai Ola PCS ‘ohana.

Should the number of applicants per grade exceed the capacity, a public lottery will take place in April to fill the available spaces.

Consistent with State Law, Nā Wai Ola PCS provides enrollment preferences to haumāna who are enrolled at Nā Wai Ola PCS during the prior school year, and to siblings of currently enrolled Nā Wai Ola PCS haumāna.

New haumāna are enrolled annually as space permits. ‘Ohana are informed of their acceptance status via letter. The projected notification date is mid-April. After the application deadline, new haumāna are considered if space is available and a second public lottery will take place during the summer. Those that are not admitted are placed on a waiting list that remains active through the end of the academic year.

### **Reenrollment**

Every spring, currently enrolled haumāna need to submit a completed “Intent to Return” form in order to continue their enrollment. Failure to submit a completed “Intent to Return” form will result in dis-enrollment, and will require you to re-apply and go through the admission process should you choose to return.