

CATHERINE PAYNE
CHAIRPERSON

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

DATE: August 13, 2015

TO: Catherine Payne, Chairperson

FROM: Tom Hutton, Executive Director

AGENDA ITEM: Action on Charter School Application for iLEAD Kauai – Alaka'i O Kaua'i

Charter School

I. DESCRIPTION

Recommendation that the Commission deny the 2014 charter school application of iLEAD Kauai – Alaka'i O Kaua'i Charter School ("iLEAD Kauai").

II. AUTHORITY

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

III. APPLICANT PROFILE

Proposed School Name: iLEAD Kauai – Alaka'i O Kaua'i Charter School

Mission: "iLEAD Kaua`i prepares learners to thrive as creative, conscientious leaders who achieve individual potential while contributing to their world. Our project-based constructivist method, offered in a safe and nurturing environment, cultivates deeper understanding and innovative thinking. With roots in the islands and wings for the world, our learners are free to think and inspired to lead."

Vision: "iLEAD Kaua`i students will thrive as creative, confident global citizens demonstrating respect and social justice practices, while impacting the greater good of society. They will ask questions, collaborate and communicate effectively to learn from and reflect on the past while

contributing to the present. It would not surprise us if the next world leader, significant artist, or technologically-minded designer with the mission to end world hunger, will have attended one of our iLEAD Schools. Rooted in the cultural perspective of Hawai`i, with deep respect for all people, the care of our 'aina, and collaborative problem-solving skills, the world will be their platform for making a difference. Individually they will be empowered; collectively they will shape and mold the endless possibilities for the future."

Geographical Area: iLEAD Kauai proposes to be located on the eastside of Kauai. The applicant states that it is looking at two prospective facilities: 1) the All Saints' Episcopal Church Gym building in downtown Kapaa; and 2) existing school facilities at Mount Kahili Park, which is 18 miles from Kapaa.

Program Synopsis: iLEAD Kauai identifies its school model as specializing in alternative education, arts, international culture focus, STEM (science, technology, engineering, and math), and project-based learning. iLEAD Kauai's curriculum is project-based with emphases on college and career readiness, self-determination and community leadership, 21st century technological literacy, entrepreneurship and economic literacy, and environmental consciousness. iLEAD Kauai will use constructivist theory teaching methods, which are based on the belief that students learn best through exploration and active learning.

Enrollment Summary

		Number of Students										
Grade Level	Yea	r 1	Yea	r 2	Yea	r 3	Yea	r 4	Yea	r 5	Capa	acity
	20:	16	203	17	202	18	202	19	202	20	20	25
Brick & Mortar/ Blended vs. Virtual	B&M/ Blended	Virtual	B&M/ Blended	Virtual	B&M/ Blended	Virtual	B&M/ Blended	Virtual	B&M/ Blended	Virtual	B&M/ Blended	Virtual
K	27		46		40		40		40		40	
1	23		23		46		40		40		40	
2	13		25		25		50		50		50	
3	12		13		25		25		50		50	
4	13		12		13		25		25		50	
5	12		13		12		13		25		50	
6	10		12		13		12		13		50	
7	10		*		12		13		12		50	
8	5		*		*		12		13		50	
9												
10												
11												
12												
Subtotals												
Totals	125		159*		212*		230		268		430	

^{*}The applicant changed its enrollment projects for Years 2 and 3 of operation from 144 to 159 and 186 to 212, respectively, but did not provide updated enrollment numbers per grade level for those two years. Therefore, the sum of the grade level projections for Years 2 and 3 do not equal the total enrollment.

IV. BACKGROUND

At its January 15, 2015 general business meeting, the Commission decided to recommend to iLEAD Kauai that it proceed with submit a Final Application but noted that iLEAD Kauai's Initial Proposal

was "Substantially Inadequate" in the area of Curriculum and Instructional Design. On March 6, 2015, iLEAD Kauai submitted a Final Application, which includes an Initial Proposal Amendment. The Evaluation Team assigned to the iLEAD Kauai application was comprised of Danny Vasconcellos, Beth Bulgeron, Jeff Poentis, Kirsten Rogers, Kenneth Surratt, and Dr. GG Weisenfeld. In conjunction with the application, the Evaluation Team interviewed applicant group members and reviewed the applicant's responses to the Request for Clarification. The applicant group members that attended the interview were Deena Fontana Moraes, Dr. Kani Blackwell, Dawn Evenson, Amber Raskin, and Stuart Rosenthal.

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

In addition, the Commission held a public hearing on the application on June 18, 2015. Kauai County Councilmember Joanna Yukimura, State Representative Derek Kawakami, State Senator Ronald Kouchi, and 25 concerned individuals submitted written testimony in support of iLEAD Kauai, including a petition with 230 signatures and a list of testimonials with 172 entries. Six applicant group members and ten other individuals provided oral testimony in support of iLEAD Kauai.

Further, staff solicited comments from the Department of Education—particularly the Kauai Complex Area Superintendent, William Arakaki—on the application. Although Mr. Arakaki did not directly respond to the Commission's request for comments, he did provide testimony in support of iLEAD Kauai at the public hearing, noting that it his responsibility to support and work with all educational institutions on Kauai to ensure all students on the island receive a quality education.

Final Application Recommendation Report.

The Evaluation Team recommends that the application for iLEAD Kauai be denied. The Final Application Recommendation Report states that the academic plan, organizational plan, financial plan, and evidence of capacity do not meet the standard of approval, highlighting in particular the fact that "[s]ignificant issues stem from a major amendment that adds middle school grades" and noting that this amendment does not appear to be a "well-thought addition."

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

- An inadequate explanation of how the numerous standards are incorporated into the curriculum;
- An inadequate explanation of how the various assessment tools will be used to improve student academic performance;
- An inadequate rationale and description of the instructional design for the middle school division; and
- A lack of demonstrated academic success at the two California charter schools currently managed and operated by iLEAD Schools Development, the proposed educational service provider ("ESP").

The report findss that the staffing structure and hiring plan for the middle school division are likely to result in teaching staff that do not meet state licensure and federal "highly qualified" requirements. Another key concern about the organizational plan is that the middle school staffing structure likely cannot provide the necessary amount of instructional time while still adhering to collective bargaining agreements, therefore rending the plan impractical.

The report notes that the application does not present an adequate budget contingency plan. Another key concern about the financial plan is a proposal for iLEAD Kauai's associated nonprofit organization to take out a loan and assign the debt to the school, which is not allowable under state financing laws.

The report states that the applicant failed to demonstrate its ability to implement its academic, organizational, and financial plans successfully. Further, the report concludes that the plan to use school funds to directly pay off the nonprofit organization's loan "demonstrates a lack of understanding of state fiscal requirements."

Applicant Response.

The Applicant Response acknowledges that parts of the application "may have not been as articulated as well as [the applicant] should have" and explains that while the "capacity to write a charter involves an important and specific skill set, [it] may not have shown through as clearly due to challenges in understanding the expectations of the application." The applicant also shares what it apparently sees as issues with the application process, such as a claim that there was not being enough time to conduct "market research" and write a detailed plan based upon the needs of the community. Still, the response attempts to clarify some key concerns brought forth in the Final Application Recommendation Report.

In regard to the academic plan concerns, the response:

- Explains that some components of the academic plan are core elements while others are "supplementary and will be gradually introduced";
- States that a detailed scope and sequence is available on iLEAD Kauai's website but was not included in the Initial Proposal Amendment because of word limits;
- Explains how the school's academic goals connect to the project-based instructional design and the "key steps to implement the integration of [project-based learning] and Common Core [State] Standards";
- Describes the rationale for a mixed grade-level classroom for the middle school division and explains how standards-aligned instruction will be delivered;
- Describes the assessment tools the school will use and explains how the school will use student data to improve academic performance;
- Suggests that the academic plan is strong because last year's Evaluation Team noted that
 the academic plan presented in iLEAD Kauai's previous application had a "deep
 understanding of project-based learning and a sophisticated level of curriculum design" and
 that the applicant made limited changes to the academic plan from last year;
- Argues that evaluating the academic performance of the California iLEAD schools using performance data from California is invalid because Hawaii's performance system is entirely different; and
- Provides alternative academic performance data for one of the California iLEAD schools and suggests this as evidence of academic success.

In regard to the organizational plan concerns, the response:

- Notes that the applicant has "identified at least three highly qualified and experienced . . .
 teachers who would be willing to work half-time and be on a plan to be [highly qualified] in
 additional subject matter areas"; and
- Argues that scheduling lunch for half-time teachers is not appropriate and explains that there will be enough teacher planning and instructional time.

In regard to the financial plan concerns, the response:

- Suggests that the increase in the per-pupil amount set for purposes of the application would provide a surplus that could be used as additional contingency funds;
- States that the applicant will use "strategic marketing and fundraising strategies to mitigate potential financial challenges";
- Explains in light of state law that "[the school] does not intend to exercise any type of loan but rather to rely heavily on fundraising efforts" but would "appeal to the [G]overnor" or find a way to solely obligate the nonprofit for the loan if fundraising efforts fall short; and
- Notes that iLEAD Schools would be willing to reduce its management fee if enrollment falls below projections.

In regard to the capacity concerns, the response:

- Suggests that while the capacity to write an application may not have been clear, the applicant team has capacity to implement the proposed plan;
- Notes that the applicant has demonstrated capacity to inspire confidence in the Kauai community and parents; and
- Justifies the qualifications of applicant group members.

Evaluation Team Rebuttal.

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

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

- Notes that the applicant's response includes new information, which the Evaluation Team cannot evaluate, including the rationale for a mixed-aged classroom and suggestions to effectively use student achievement data;
- Maintains that the academic plan is not clear and that the applicant "fails to describe a comprehensive framework driven by Common Core State Standards";
- Contends that the Evaluation Team's concerns pertain to the addition of middle school grades, not the use of a mixed-age classroom; and
- Maintains that "iLEAD Schools' academic performance is not strong" and that the
 performance data provided do not "support the proposed academic methodologies."

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

- Maintains that concerns remain about state teacher licensing and federal highly qualified requirements; and
- Notes that the applicant's response includes new information, which the Evaluation Team cannot evaluate, about highly qualified teacher percentages of middle schools on Kauai.

In regard to the applicant's response to the financial plan concerns, the rebuttal notes that the applicant's response includes new information, which the Evaluation Team cannot evaluate, about a contingency plan with a reduced management fee.

Applications Committee Meeting.

At the August 4, 2015 Applications Committee meeting, the proposed school director and some applicant group members provided oral testimony in support of the application. Five individuals, including the proposed school director, also submitted written testimony in support of the application. The committee had a discussion and asked questions about the middle school division, the academic plan, and iLEAD Schools Development's academic performance but did not take action on the application.

V. DECISION MAKING STATEMENT

Introduction.

Scope of Commissioner Review.

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

Staff Recommendation Focuses on Key Points.

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

The academic performance of iLEAD Schools Development's existing schools is not strong.

The Final Application Recommendation Report states that an analysis of the Northwest Evaluation Association's ("NWEA") Measures of Academic Progress ("MAP") test data from iLEAD Schools' longest-running school—Santa Clarita Valley International Charter School ("SCVi") in California— "raises important questions about the rigor and quality" of the instructional design after which iLEAD Kauai is modeled. In its response, the applicant provides data that it maintains demonstrates

SCVi's growth in reading and math that is above the national norm in several grade levels. However, the Evaluation Team rebutted that it was "unable to determine how this data was derived and its accuracy," as it appears to be a reinterpretation of the data previously provided to the Evaluation Team. Instead, the data previously provided reveals every tested grade level at SCVi performed below average in both reading and math when compared to nationally-normed data. As stated in the Evaluation Team Rebuttal, "the inability of the applicant to provide evidence of the success of its project-based learning model remains a major concern" and does not demonstrate that iLEAD Schools' academic model produces high-quality student outcomes.

The Applicant Response argues that "it would be more appropriate to look at [iLEAD Schools] through the Hawaii Strive HI system" instead of evaluating its schools "through a California lens that is disconnected to the realities of the Hawaii educational and measurement system." However, the applicant has not provided any evidence that demonstrates academic success at the ESP's existing schools other than the NWEA MAP data and self-reported attendance, graduation, and college acceptance rates (of which only the attendance rate would be applicable to iLEAD Kauai, as it does not propose to serve high school). As stated last year, staff believes it would be prudent to wait until the ESP can show a clear record of success before approving a school in Hawaii using the same model.

The academic plan is not comprehensive and coherent, and it is unclear how many of the components work together.

It is not clear how the multiple standards are incorporated into the curriculum and how the school will use the project-based learning curriculum to achieve its academic goals. The Applicant Response provides a table illustrating the connections between the academic goals and curriculum and six steps to "implement the integration of [project-based learning] and Common Core [State] Standards." However, the Evaluation Team rebutted that the "steps provide vague actions... that fail to describe a comprehensive framework driven by Common Core State Standards." Further, the table provided illustrates an analysis that the applicant did not previously provide to the Evaluation Team and therefore has not been holistically evaluated.

Additionally, it is unclear how the various assessment tools will be used to improve student achievement. As an example, the recommendation report states that "the [academic] plan does not describe how the school will develop [individualized learning plans] and establish appropriate developmental goals that will ensure continued student progress" even though the purpose of the individualized learning plans is to ensure individual students are working toward attainable goals. The applicant's response seemingly attempts to address this concern, but the information and list of suggestions provided is new and has not been holistically evaluated by the Evaluation Team.

The middle school division has not been adequately thought through or explained.

The recommendation report notes that there is a lack of a "rationale for a mixed grade-level classroom or [a description of] how the school will deliver standards-aligned instruction in this type of learning environment" for the middle school division. The applicant's response provides new detailed information to address the concern, which the Evaluation Team could not holistically evaluate. The applicant's response also notes that it was "unable to locate an appropriate area in the application to provide [this information]." At the start of and throughout the application process, staff cautioned applicants against substantially amending their Initial Proposals because applicants would have "difficulty fully explaining the amendment and its impacts on all parts of the

application to the Evaluation Team's satisfaction within the space provided" (page 13 of the Request for Proposals). The addition of the middle school grades is a major amendment and exemplifies the reasons for this caution. The applicant should have provided all of the necessary information within the Initial Proposal Amendment but did not either due to an oversight or because the applicant did not adequately think through the implementation of the middle school, raising capacity concerns.

Further illustrating the issues with the middle school, the recommendation report notes issues with state and federal requirements related to teacher licensing and highly qualified ("HQ") teachers and contends that the staffing structure will likely result in "middle school students [who] will not be taught by [an] HQ teacher in at least two core subject areas," as required by federal law. The applicant's response claims there are three HQ teachers interested in working for iLEAD Kauai on a half-time basis, and the school will "support these teachers to become HQ in a second area" before it opens. However, the applicant acknowledges that should this plan fail, all of the core subject areas will not be staffed by HQ teachers, thus starting the school out of compliance with federal requirements, with Commission approval.

Financial concerns remain about the schools financial plan, its lack of a contingency budget plan, and the school's reliance on some form of loan.

Charter schools are not allowed to take out loans or lines of credit, yet the applicant proposed taking on debt for start-up costs. The recommendation report states, "the applicant's intent to use school funds to directly pay off a loan to the nonprofit organization demonstrates a lack of understanding of state fiscal requirements." In its response, the applicant states it "could not locate any law/rule that would prohibit its [nonprofit organization] from loaning monies to the school... [but] now [understands] that this discrepancy has resulted from a misunderstanding of a regulation applying to state entities that also applies to charter schools." The applicant's response further states the school may request gubernatorial permission to take out a loan and that it has had some kind of discussion with the ESP about its possible willingness to forgive an enrollment shortfall. These speculative measures do not provide the kind of reassurance that a contingency budget would.

There appears to be strong community support for iLEAD Kauai.

Based on the testimony received at the public hearing, it appears that there is strong community support for the proposed school.

Conclusion.

Staff agrees with the Evaluation Team that the applicant fails to present a plan for a high-quality charter school. While the community appears to support this proposed school, there are serious concerns about the cohesiveness of the academic plan. The plan for the middle school division in particular does not appear to be thoroughly developed. Further, there are concerns about the applicant's understanding of laws designed to protect public dollars and limit state liability and its financial contingency plan. Perhaps most concerning, the ESP's model has not yet proven academic success in its own state. However, should the ESP's two California schools show successful student outcomes, staff would welcome the applicant to submit another application with a clearer and more comprehensive plan in the future.

Staff recommends the denial of iLEAD Kauai's application.

VI. <u>RECOMMENDATION</u>

"Moved deny the 2014 charter school application for iLEAD Kauai – Alaka'i O Kaua'i Charter School."

Exhibit A

Final Application Recommendation Report for iLEAD Kauai



State Public Charter School Commission 2014 Final Application Recommendation Report

Charter Application for iLEAD Kauai – Alakai O Kauai Charter School

Evaluation Team

Team Lead: Danny Vasconcellos

Evaluators: Beth Bulgeron

Jeff Poentis Kirsten Rogers Kenneth Surratt GG Weisenfeld

Introduction

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

The 2014 Request for Proposals and the resulting evaluation process are rigorous, thorough, transparent, and demanding. The process is meant to ensure that charter school operators possess the capacity to implement sound strategies, practices, and methodologies. Successful applicants will clearly demonstrate high levels of expertise in the areas of education, school finance, administration, and management as well as high expectations for excellence in professional standards and student achievement.

Final Application Evaluation Process

The Commission examined feedback from its 2013 Application Cycle and researched the application processes from several states to develop a new, multiphase charter school application evaluation process. Building off of the advice and training from national experts and experience gained in the last application cycle, the Commission's Operations Section created standardized evaluation forms, provided evaluator training, and assembled the Evaluation Team based on the national best practices, policies, and standards needed to authorize high-performing charter schools. The highlights of the Final Application phase of the application evaluation process are as follows:

Final Application Evaluation. The Evaluation Team conducted individual and group assessments of completed Final Applications (including Initial Proposals and Initial Proposal Amendments). The Commission's Operations Section conducted a completeness check to ensure the Evaluation Team only reviewed complete submissions.

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

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

Due Diligence. The Evaluation Team considered any other available information relevant to each application. The Commission's Operations Section produced informational reports on Charter Management Organizations and Educational Management Organizations associated with applicants for the Evaluation Team to consider.

Consensus Judgment. The evaluation teams came to consensus regarding whether to recommend the application for approval or denial.

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

Report Contents

This Recommendation Report includes the following:

Proposal Overview

Basic information about the proposed school as presented in the Final Application.

Recommendation

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

Evaluation

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

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

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

Rating Characteristics

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

Proposal Overview

Proposed School Name

iLEAD Kauai - Alaka'i O Kaua'i Charter School

Mission and Vision

Mission: "iLEAD Kaua`i prepares learners to thrive as creative, conscientious leaders who achieve individual potential while contributing to their world. Our project-based constructivist method, offered in a safe and nurturing environment, cultivates deeper understanding and innovative thinking. With roots in the islands and wings for the world, our learners are free to think and inspired to lead."

Vision: "iLEAD Kaua`i students will thrive as creative, confident global citizens demonstrating respect and social justice practices, while impacting the greater good of society. They will ask questions, collaborate and communicate effectively to learn from and reflect on the past while contributing to the present. It would not surprise us if the next world leader, significant artist, or technologically-minded designer with the mission to end world hunger, will have attended one of our iLEAD Schools. Rooted in the cultural perspective of Hawai`i, with deep respect for all people, the care of our 'aina, and collaborative problem-solving skills, the world will be their platform for making a difference. Individually they will be empowered; collectively they will shape and mold the endless possibilities for the future."

Geographic Location

iLEAD Kauai proposes to be located on the eastside of Kauai. The applicant states that it is looking at two prospective facilities: 1) the All Saints' Episcopal Church Gym building in downtown Kapaa; and 2) existing school facilities at Mount Kahili Park, which is 18 miles from Kapaa.

Anticipated Student Population

iLEAD Kauai proposes to be open to students throughout Kauai but anticipates serving mostly families from the Kapaa and Wailua areas. According to the applicant, "Kapa'a, the most residential part of the island, has hard-working families with many holding down multiple jobs. The town is comprised of several small businesses. Families in the area range from low to medium socio-economic bracket." The applicant also states that there is an "influx of Marshallese and other diverse families into the area."

Contribution to Public Education System

iLEAD Kauai proposes to have innovative practices, such as "a global focus, small class sizes, data-driven individualized learning plans, collaborative professional development, student empowerment, curricular innovations and equity, and integration of technology." The applicant also states that iLEAD Kauai will provide educational choice and "immediate capacity assistance" to the "most populated area" of Kauai, further explaining that it will "especially provide relief for Kaua'i's largest elementary school, Kapa'a Elementary School, which is struggling in size and performance" and that the "enrollment situation at Kapa'a Elementary School may be a contributing factor to their 'focus' status as referenced in the 2013-2014 Strive HI System School Report." In addition, the applicant states that "traditional schools provide a one-size-fits all model" and that "many Micronesian families have immigrated to Kaua'i and schools are not meeting their specific needs." Finally, the applicant asserts that there is a "need for more choice, project-based instruction, and performance assessment," concluding, "[as] more public schools move in the direction of Common Core Standards, we would love to share our discoveries and successes regarding the use of PBL with other schools."

Enrollment Summary

Enrollment S	nrollment Summary											
					Nι	ımber o	f Student	:S				
Grade Level	Yea	r 1	Yea	r 2	Yea	r 3	Yea	r 4	Yea	r 5	Сара	acity
	20:	16	201	17	201	18	201	19	202	20	20	25
Brick & Mortar/ Blended vs. Virtual	B&M/ Blended	Virtual	B&M/ Blended	Virtual	B&M/ Blended	Virtual	B&M/ Blended	Virtual	B&M/ Blended	Virtual	B&M/ Blended	Virtual
K	27		46		40		40		40		40	
1	23		23		46		40		40		40	
2	13		25		25		50		50		50	
3	12		13		25		25		50		50	
4	13		12		13		25		25		50	
5	12		13		12		13		25		50	
6	10		12		13		12		13		50	
7	10		*		12		13		12		50	
8	5		*		*		12		13		50	
9												
10												
11												
12												
Subtotals												
Totals	125		159*		212*		230		268		430	

^{*}The applicant changed its enrollment projects for Years 2 and 3 of operation from 144 to 159 and 186 to 212, respectively, but did not provide updated enrollment numbers per grade level for those two years. Therefore, the sum of the grade level projections for Years 2 and 3 do not equal the total enrollment.

Executive Summary

iLEAD Kauai – Alaka'i O Kaua'i Charter School

Recommendation

Deny

Summary Analysis

The Evaluation Team recommends that the application for iLEAD Kauai – Alaka'i O Kaua'i Charter School ("iLEAD Kauai") be denied. The applicant did not meet the standards in all of the four areas.

Significant issues stem from a major amendment that adds middle school grades in Year 1 of operations. The amendment does not appear to be a well-thought addition, which leaves the Evaluation Team with concerns regarding the quality of the middle school division. Organizational issues include highly qualified and teacher licensure compliance concerns in the middle school grades and an unrealistic hiring plan that depends on the recruitment of two half-time middle school teachers who between them would need to be highly qualified in the four core subject areas to meet federal requirements.

Academically, the applicant does not present a cohesive education plan and includes too many components without clear plans for successful implementation. For example, the Academic Plan provides numerous standards that make up the framework for the school's instructional design but does not explain how these standards fit together. Additionally, the academic model provided by the applicant's educational service provider, iLEAD Schools Development ("iLEAD Schools"), has not demonstrated academic success in schools that have implemented iLEAD Schools' model.

Financially, the applicant does not provide a sound contingency plan to meet financial needs if anticipated revenues are not received or are lower than estimated. A contingency plan is essential as the applicant's budget for Year 1 is strictly balanced, meaning that enrollment targets must be met to implement the financial plan.

Summary of Section Ratings

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

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

Academic Plan	Financial Plan
Does Not Meet the Standard	Does Not Meet the Standard
Organizational Plan	Evidence of Capacity
Does Not Meet the Standard	Does Not Meet the Standard

Academic Plan

iLEAD Kauai - Alaka'i O Kaua'i Charter School

Rating

Does Not Meet the Standard

Plan Summary

The proposed school will follow the instructional theories and methods that form the acronym for its name, iLEAD: international learning, leadership, entrepreneurial development, arts, and design thinking.

iLEAD Kauai will contract with iLEAD Schools, a nonprofit charter management organization ("CMO") based in California, for educational services, which include access to curriculum and professional development training and coaching for teachers.

At iLEAD Kauai, students will participate in project-based learning ("PBL"), taking charge of their own learning by actively designing, researching, and developing an in-depth study on a topic of interest. The school seeks to use PBL to teach students to solve complex problems using fundamental skills (reading, writing, and math) and workplace skills (teamwork, problem solving, research gathering, time management, information synthesizing, and utilizing high-tech tools). Assessment strategies will include graphic organizers, cooperative learning activities, self-reflection, oral and written reports, and Presentations of Learning.

Initially, iLEAD Kauai was planned as an elementary school (kindergarten through grade 5); a later application amendment added a middle school division and expanded the grade offerings to include grades 6 to 8.

Analysis

The Academic Plan **does not meet the standard** for approval because it has substantial gaps, lacks detail, and requires more information in the area of Curriculum and Instructional Design. The plan does not provide enough specific information to show thorough preparation and fails to present a clear, realistic picture of how the school expects to operate.

The Academic Plan does not provide a comprehensive framework for rigorous, high-quality instructional design that is aligned to academic standards. The plan identifies numerous standards that will guide the school's instructional design—such as the Common Core State Standards, the Hawaii Content and Performance Standards, the Hawaii Department of Education General Learner Outcomes, and International Society for Technology Education Standards for Learners—but does not explain how they are incorporated into the curriculum. It also identifies PBL as the crux of the school's instructional design but fails to describe how the school will use PBL to achieve its stated academic goals. Furthermore, the applicant amended the application to add a middle school division that would be a combined class of sixth, seventh, and eighth grade students but does not provide the rationale for a mixed grade-level classroom or describe how the school will deliver standards-aligned instruction in this type of learning environment.

Additionally, the lack of demonstrated academic success at iLEAD Schools' existing charter schools, which use the same PBL curriculum that iLEAD Kauai proposes to implement, raises important questions about the rigor and quality of the school's instructional design. The applicant provided Fall 2014

assessment data for iLEAD Schools' longest-running school, Santa Clarita Valley International Charter School ("SCVi") in California, as evidence that iLEAD Schools' currently operating schools are academically successful. However, based on the Evaluation Team's analysis of the provided Northwest Evaluation Association's Measures of Academic Progress test data and additional due diligence, it does not appear that SCVi's academic performance is strong. When compared to California statewide data, every tested grade level at SCVi performed below the 50th percentile in reading and below the 40th percentile in math.

The Academic Plan does not provide a clear and comprehensive plan for how the proposed school will assess the progress of individual students, student cohorts, and the school as a whole on identified metrics, and the plan does not, clearly describe the formalized process for monitoring student progress, clearly identify course outcomes, and demonstrate alignment with standards from grade to grade. As with other aspects of the Academic Plan, the applicant provides a list of various assessment tools that will be used to measure student progress—such as grade level rubrics, checklists of progress, and individualized learning plans ("ILP")—but fails to describe how these tools will be used to improve student academic performance. For example, the Academic Plan states that the purpose of ILPs are to ensure that each student is treated as an individual and is working towards attainable goals; however, the plan does not describe how the school will develop ILPs and establish appropriate developmental goals that will ensure continued student progress.

The Academic Plan does not provide a clear and comprehensive plan for how instructional leaders and teachers will administer, collect, and analyze the results of diagnostic, formative, benchmark/interim, and summative assessments to inform programmatic and instructional planning decisions and make adjustments to curricula, professional development, and other school components. The Academic Plan states that the school will adopt a school information system that has the capacity to create reports on student achievement but does not describe what data the assessment tools will provide, what results/outcomes the data are intended to show, how the data will be entered into the school information system, and how teachers can use the reports created by the school information system to measure student progress and adjust student goals and curriculum, if needed.

Overall, the Academic Plan continually describes the tools that iLEAD Kauai intends to use but fails to describe how and why the tools are being used, thereby bringing into question the school's capacity to effectively implement the plan and achieve its stated academic goals.

Organizational Plan

iLEAD Kauai - Alaka'i O Kaua'i Charter School

Rating

Does Not Meet the Standard

Plan Summary

iLEAD Kauai proposes a governance team, comprised of a governing board and the School Director, that will assume collective responsibility for building unity and creating a positive organizational culture in order to govern effectively. The role of iLEAD Schools will be to provide assistance with back-office business functions, leadership and instructional coaching, instructional models, information technology, facilities, and start-up guidance and support. The applicant also plans to establish a nonprofit organization, iLEAD Hawaii, to be responsible for fundraising activities, such as coordinating donation drives, developing community partnerships, writing grants, and other activities that would assist in raising funds for the school.

After submitting its Initial Proposal, the applicant amended the application by adding a middle school division with a total of 25 students. The applicant stated that the middle school grades, which would be taught as a combined class made up of grades six through eight, would be staffed by two half-time teachers.

Analysis

The Organizational Plan **does not meet the standard** for approval because it has substantial gaps in the area of Staffing Plan, Hiring, Management, and Evaluation and does not reflect a thorough understanding of key issues.

The Organizational Plan does not provide an adequate recruitment and hiring strategy that is likely to result in strong teaching staff that meet ESEA requirements for being "Highly Qualified" and are well suited to the proposed school. The applicant's staffing structure and hiring strategy are likely to result in a teaching staff that does not meet the federal highly qualified ("HQ") and state teacher licensure requirements. The applicant proposes that the middle school grades, which would be taught as a combined class made up of grades six through eight, will be staffed by two half-time teachers for the first two years of operation. If each teacher meets the federal HQ requirements in only one of the four required subject areas—Math, English, Science, and Social Studies—middle school students will not be taught by a HQ teacher in at least two core subject areas. The applicant acknowledged that the teachers hired would need additional professional development to become HQ in the other subject areas.

This is problematic because core classes must be taught by HQ teachers according to the federal HQ requirements yet the staffing plan proposed by the applicant concedes that half of iLEAD Kauai's middle school core classes will not be taught by an HQ teacher.

<u>The Organizational Plan does not exercise clear, realistic, and legally sound procedures for hiring school personnel.</u> For middle school teachers, state teacher licenses are subject-specific, unlike elementary school teachers who receive a general elementary education license. As a result, in order for iLEAD Kauai to satisfy state licensure requirements, the two half-time teachers would need to be licensed in all four core subject areas. Since teachers that do not meet federal HQ requirements will also not be able

to meet state teacher licensure requirements, the applicant's hiring strategy will likely result in a middle school division taught by teachers who do not meet federal HQ and state licensure requirements. This directly contradicts the applicant's statement that they recognize that high student achievement depends on the instructional capacity and the excellence of the teachers hired.

In order to properly staff its middle school division, iLEAD Kauai will need to find two teachers who, between them, are licensed and highly qualified in all of the four required subject areas and are willing to be hired on a half-time basis to teach a class of 25 middle school students. According to the master collective bargaining agreement between the Hawaii State Teachers Association and the State, the work hours for half-time teachers cannot exceed 17.5 hours a week and should include teacher preparation time and daily lunch time, which allows each iLEAD Kauai middle school teacher less than four hours a day of instructional time. In addition to the academic concerns that this arrangement raises, the Evaluation Team questions the practicality of this plan and its chances of success.

Financial Plan

iLEAD Kauai - Alaka'i O Kaua'i Charter School

Rating

Does Not Meet the Standard

Plan Summary

Financial duties and responsibilities for iLEAD Kauai are assigned as follows: the governing board is responsible to approve all new hires and all contracts over \$5,000; the School Director is responsible for ensuring that all approved policies and procedures are followed; and the Business Manager is responsible for implementing day-to-day sound fiscal practices surrounding budget review, purchasing, processing invoices, and reporting to the governing board. In addition to educational services, iLEAD Schools will provide financial management services by providing assistance to the governing board, School Director, and Business Manager.

In Year 0, iLEAD Schools will make a loan of \$100,000 to the nonprofit organization associated with the school for start-up costs. The loan will be at a 9% interest rate with "interest only" payments for the first three years.

The following chart provides the budget revenues, expenses, and operating gains or losses for Years 1 through 3:

	Total Operating Revenues	Total Operating Expenses	Total Operating Gain/(Loss)
Year 1	\$914,286	\$904,738	\$9,548
Year 2	\$1,167,445	\$1,140,041	\$27,404
Year 3	\$1,548,101	\$1,515,064	\$33,037

Analysis

The Financial Plan **does not meet standard** for approval because it has substantial gaps and does not reflect a thorough understanding of key issues. It does not provide enough accurate, specific information to show thorough preparation and fails to present a clear realistic picture of how the school expects to operate.

The Financial Plan does not provide a sound contingency plan to meet financial needs if anticipated revenues are not received or are lower than estimated. The applicant's Financial Plan already requires iLEAD Kauai to operate with minimal increases in net assets and a lean budget in Years 1 through 3. In Year 1, an operating surplus of approximately \$9,548 is anticipated; however, the applicant intends to use this to make a payment of \$9,000 to the loan that is needed to cover start-up costs. This leaves the applicant with no actual surplus or contingency funds to fall back on. Furthermore, state financing guidelines do not allow public charter schools to take out loans or lines of credit. In the capacity interview, the applicant stated that the loan would be made to the nonprofit organization associated with the school and the nonprofit would then assign the debt to the school through some kind of agreement. Therefore, this arrangement is a de facto loan to the school that may not be allowed.

The applicant's budget narrative fails to provide a contingency plan that describes the specific actions that iLEAD Kauai would take should anticipated revenues be lower than estimated. Instead, the

applicant only says that they would seek funding from Charter Asset Management and Charter School Capital, two organizations that provide resources to charter schools. A contingency plan should explain the actions the school would take should it fail to meet enrollment targets by a somewhat substantial amount, such as 10-15%. As evidenced by charter schools that have opened in Hawaii in the last three years, achieving enrollment targets has presented challenges for new charter schools. For iLEAD Kauai, a 10% drop from its targeted enrollment would amount to about 13 students and a reduction of approximately \$81,000 in the per-pupil allocation. A detailed contingency plan is essential to the successful implementation of the applicant's overall plan.

Evidence of Capacity

iLEAD Kauai – Alaka'i O Kaua'i Charter School

Rating

Does Not Meet the Standard

Plan Summary

iLEAD Kauai has identified the following individuals as key members of its applicant team:

- Deena Fontana Moraes, the proposed School Director who served as an elementary school teacher in Brazil and recently completed an internship with iLEAD Schools;
- Dr. Kani Blackwell, the proposed Outreach and Development Coordinator who has over 24 years
 of experience in K-12 public education and over 24 years of experience as an educator in several
 university systems;
- Stuart Rosenthal, the proposed Business Manager who currently serves as the Business Manager of Kawaikini New Century Public Charter School;
- Dawn Everson, the Executive Director of iLEAD Schools who has twenty-five years of experience in education, with expertise in K-8 curriculum, instruction, assessment, school leadership, and governance; and
- Amber Raskin, the Executive Director of Business Development and Operations of iLEAD Schools who has experience in school governance and business management.

Analysis

The Evidence of Capacity **does not meet the standard** for approval because the applicant does not inspire confidence in its capacity to carry out the proposed plan effectively. The applicant failed to provide sufficient evidence that its key members possess the collective qualifications—including a demonstrated understanding of challenges, issues, and requirements associated with running a charter school—to implement the proposed school's Academic, Organizational, and Financial Plans. Several applicant group members have impressive individual credentials and experience; however, as a collective, they have failed to instill confidence in their ability to successfully open a charter school.

The applicant failed to demonstrate the academic team's ability to develop, articulate, and implement an Academic Plan that is cohesive. The applicant listed various standards, assessment tools, student goals, and curriculum but failed to explain how these components fit together into a rigorous academic program. Despite repeated requests for further explanation, the applicant's inability to explain beyond the recitation of these tools ultimately draws into question the capacity to effectively implement its stated Academic Plan. In addition, the proposed educational service provider, iLEAD Schools, has yet to provide evidence of the academic success of its educational program.

Further, the applicant failed to demonstrate the organizational team's ability to implement the Organizational Plan successfully. The applicant failed to develop a realistic hiring strategy that would result in a strong teaching staff. Instead the applicant developed a hiring strategy that would likely result in the hiring of half-time middle school teachers that would not meet federal HQ and state licensure requirements.

Lastly, the applicant failed to demonstrate the financial team's ability to implement the Financial Plan successfully. The inadequacy of the contingency plan stands out as a significant weakness of the Financial Plan due to the lack of contingency funds, particularly in Year 1 of operations. Further, the applicant's intent to use school funds to directly pay off a loan to the nonprofit organization demonstrates a lack of understanding of state fiscal requirements.

Evaluator Biographies

Danny Vasconcellos

Mr. Vasconcellos is the Commission's Organizational Performance Manager. He previously worked at the State Office of the Auditor as an Analyst where he worked on or lead projects (such as the audit of Hawaii's charter schools and a study of the Hawaii Teacher Standards Board) where he analyzed agency effectiveness and efficiency and identified internal control weaknesses. He also served as a researcher for the Hawaii State Legislature's House Finance Committee and has extensive knowledge of Hawaii's legislative process and funding. He holds a Master of Public Administration from the University of Hawaii at Manoa.

Beth Bulgeron

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

Jeff Poentis

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

Kirsten Rogers

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

Kenneth Surratt

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

GG Weisenfeld

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

<u>Exhibit B</u> Applicant Response for iLEAD Kauai

2014 Response to Final Application Recommendation Report iLEAD Kaua'i – Alaka'i O Kaua'i Response to Evaluation Staff Recommendations

Introduction

The iLEAD Kauai team recognizes that opening and maintaining a successful, high-performing charter school depends on having a complete, coherent plan and identifying highly capable individuals to execute that plan. The core values of our educational model are:

- 21st Century Skill Development through Project Based Learning (PBL) involving authentic local real world problems with global applications.
- College and Career Readiness through alignment with Hawaii Common Core Standards
- <u>Social Emotional Learning</u> through the 7 Habits, Hawaiian GLOs, and the IB Learner profile
- <u>Personalized Instruction</u> through strategic implementation of Individualized Learning Plans (ILPs)

iLEAD Schools currently supports the operation of six schools in California and will be opening three additional schools in the 2015-2016 school year. These schools would not be possible without a complete, coherent plan and capable individuals to execute that plan. In the 2013 Hawaii State Charter School Application, the Evaluation Committee confirmed our team as highly capable, stating: "members of iLEAD Development demonstrate strong school leadership and management skills." Furthermore, iLEAD (Alaka'i o Kaua'i) presents a strong local founding team, board, and hui who have a wealth of experience, knowledge and passion to open and conduct a successful charter school. Kauai's leaders have expressed robust support and the community has clearly voiced their desire for iLEAD Kauai to open in 2016 for their children.

Enrollment Summary

* Enrollment Adjustments for years 2 and 3 (Page 2)

As the iLEAD Kauai team adjusted to the process of the application process, we were unclear about the stipulations. Our team would have willingly given additional information but thought it would be deemed as new information and for this reason we did not submit it. We respectfully submit the K-8 Enrollment Plan for iLEAD Kauai from Year 1 to Capacity.

Grade Level	Year 1 2016	Year 2 2017	Year 3 2018	Year 4 2019	Year 5 2020	Capacity 2025
K	23	40	40	40	40	40
1	23	23	46	40	40	40
2	13	25	25	50	50	50
3	12	13	25	25	50	50
4	13	12	13	25	25	50
5	12	13	12	13	25	50
6	10	13	26	12	13	50
7	10	10	15	13	12	50

8	9	10	10	12	13	50
Totals	125	159	212	230	268	430

Executive Summary

- A major amendment that adds middle school grades in Year 1 of operations (Page 3) With the new change to adopt a two-phase application system, the time span for assessing the true needs of the community was limited. Throughout the application process, the iLEAD Kauai team had been soliciting advice from local experts, polling our public and applying the feedback given in the 2013 application cycle. As a result of this process (that included an intent to enroll form on our website and interviews with local education officials), the community and its leaders expressed a strong and immediate need for a middle school. Consequentially, we modified our application in Phase 2 to reflect the expressed needs of our community. However, it is important to note that the addition of the middle school only appears as a major amendment due to the twopart system that was implemented this year. In this new system, applicants were given five weeks to formalize all academic and enrollment decisions whereas in the former process, ongoing adjustments would be expected to take place during the entire 16-week span. This longer period of time allowed applicants to perform proper market research and formalize specific details before submitting the entire proposal formally and having any changes be considered major amendments. Thus, the addition was based upon needs of our community and a strategic plan to have a successful middle school addition with adequate curricula, staffing, and funding.
- Highly qualified and teacher licensure compliance concerns in the middle school grades and an unrealistic hiring plan that depends on the recruitment of two half-time middle school teachers (Page 3)

In the very specific ecosystem of schooling on Kauai, we have identified at least three highly qualified and experienced HQ teachers who would be willing to work half-time and be on a plan to be HQ in additional subject matter areas, which would simply entail passing a PRAXIS test in the secondary HQ area. In order to provide clarification of our possible intended hires, we have identified three teachers that have expressed interest in these positions that we described. Ms. Leslie Frasier who is an HQ certified teacher is currently employed at a middle school on Kauai. Her passion is to be involved in alternative educational options and she has stated her willingness to pursue additional HQ status and work half-time as the school builds its student enrollment and ability to offer a full-time position. Another teacher is Jaron Lawson who is currently HQ in Social Studies and already pursuing a secondary area in Science. Finally, Ms. Rebecca Stevenson who is currently employed at a Kauai Charter School and a HQ teacher in English. Ms. Stevenson writes: "I would be very willing to pursue a second subject area certification. And a part-time secondary teaching position would be ideal for balancing my family, career, and professional development - not just for me, but also for many teachers who struggle to balance home and teaching lives on Kauai. Mahalo!"

• Academically, an education plan including too many components without clear plans for successful implementation (Page 3)

There truly are many factors involved in learning at an iLEAD School. To better understand the different components that inform this highly holistic process, our team attempted to elucidate the different individual parts with clarity. Although it might not have come through in the written application, the framework for the school's instructional design fits together as has been

evidenced by students' growth at our already established iLEAD schools. We described in our initial proposal amendment: "For Kauai, we realize there are several elements to our proposal and that sufficient time, resources, and professional development will be needed to carry out these elements." For this reason, we would like to clarify that certain elements of our proposal are core elements that formulate the very foundation of our instructional design (PBL and ILP), while other items are supplementary and will be gradually introduced as resources, training and scheduling allows. We don't expect to implement all the components during our first year of operation. The individual components fit together through careful implementation of the common core curriculum, which drives the planning for all Mathematics, English/Language Arts (ELA) and Project-Based Learning activities. 21st century skills are also at the forefront of project planning, implementation and assessment. In addition to other assessments, the ILP (as described in Section III-B3) supports each student's individual and personalized academic, social and emotional growth as they move through the iLEAD model of learning. The ILPs are monitored and assessed for growth throughout the year in a way similar to portfolio assessments and parent/teacher/student conferences. Individual assessments of attainment or mastery of specific skills will be measured and noted in the ILP.

iLEAD Schools Development ("iLEAD Schools") demonstrated academic success (Page 3) Hawaii truly has been a leader in moving away from the No Child Left Behind (NCLB) accountability system that was used in the past to assess student performance based on federally designed one-size fits-all targets for student achievement. As California is still in the process of redefining their NCLB API Performance Index (based purely on test scores) to include additional measures of student progress, Hawaii has developed the Strive HI system, in which accountability focuses on student growth, school attainment and college and career readiness. This shift in emphasis is very similar to the emphasis on individual student growth and college career readiness that drives learning and assessment at the iLEAD schools. At our schools the emphasis is on personalized deeper learning that cultivates the growth of each individual, all the while emphasizing the future path for college and career readiness through the development of 21st century skills. Donald E. Fisher, an Oahu attorney and parent explained to one of our iLEAD Kauai members, "my two boys go to Island Pacific Academy (Oahu private school), which implements project-based learning and our bubble scores also seem to be average, but what are produced are amazing life-long learning graduates that are ready for college or careers! That is what matters." Linda Darling-Hammond from Stanford University in her article, "Beyond Bubble Test" (2014) explains why we need performance assessments that provide evidence of competence in oral and written communication, critical thinking, and technology use as well as competence in the arts, world languages and other fields. iLEAD Schools have mastery and performance assessments through their Presentations of Learning (POL), that incorporate the oral and written communication, critical thinking, technology, arts, and world languages that Darling-Hammond advocates.

In addition, California's current assessment model is not aligned with Hawaii's new STRIVE HI model for growth. To compare the academic performance of one system through the lens of an entirely different system is not valid. We can evidence this in the way school ratings drastically changed for public schools in Hawaii that have consistently performed at lower levels on prior assessment model and have been given superior performance ratings in the new system due to additional training and supports that have been put into place. We feel confident that iLEAD's model for education aligns well with Hawaii's new assessment model. This encourages us as we anticipate clearly measurable and recognized success within the STRIVE HI assessment system,

and future success as California continues to move away from outdated and ineffective requirements in development of a modified accountability system with multiple measures and meaningful benchmarks.

• Financially, a sound contingency plan to meet financial needs (Page 3)

Our team is aware of the difficulty of balancing a budget for Hawaii charter schools and the kuleana of managing public funds. The challenge is particularly clear when developing a sound budget based on per pupil funding of \$6200 given in the application. Yet, we are cognizant of regular adjustments as displayed in per pupil funding in 2015-2016 school year at \$6,520, \$6,315 for 2014-2015 and \$6,008 for 2013-2014, and are hopeful that for the 2016-2017 school year, actual per pupil funding would at least remain consistent with the 2015-2016 allotments. If this were the case, an additional \$40,000 contingency would be built into our application for Year 1 with target enrollment of 125 students. However, upon receiving our charter, the iLEAD Kauai team will begin strategic marketing and fundraising strategies to mitigate potential financial challenges that would necessitate the use of contingency funds. Our team recognizes the need for a sound contingency plan as we move forward and have put additional agreements into place as a collaborative effort between iLEAD Kauai and the ESP, and the non-profit organization. This contingency plan will be further explained in the financial section.

Academic Plan

- The Academic Plan overview (Page 4)
- In order for our team to truly envision a clear, realistic picture of curriculum, instructional design and school operations, our proposed school director worked as an administration resident at an iLEAD school (K-8) and participated in all aspects of curriculum, instructional design and school operation over the course of a full school year (2014-2015). To take that holistic experience of an operating school and deconstruct it into different components for the written application was challenging. Therefore, our team may have concentrated too heavily on each individual component without reconstructing the vision for our evaluators at the end. It is important to note that last year's evaluation team iLEAD Kauai's Academic Plan had a "deep understanding of project-based learning and a sophisticated level of curriculum design." We would like to affirm that there have been no changes to the foundations of our academic plan except for the changes to adapt the curriculum to the unique culture, requirements, and laws of Hawaii.
- A framework for rigorous, high-quality instructional design) that is aligned to academic standards, incorporating numerous standards into the curriculum (Page 4)

 Project Based Learning Methods (outlined in section IIIB-7) are interwoven to form a natural framework where students simultaneously engage in classroom activities that address content standards, encourage social emotional learning, and cultivate self-directed learning practices. We describe this process in section IIIB-1 as the embodiment of our iLEAD Motto: "Free to think and inspired to lead." Although we do examine and implement several different standards as organizational elements, our emphasis is on the Common Core standards that provide Language Arts and Math throughout all the grade levels. The standards themselves spiral inter-relatedly from grades K-12. We will use these standards as foundational tools in creating our pacing guides and lesson plans across curricula with teacher teams. Furthermore, our extensive scope and sequence depicts the breadth of subject matter with cross-curricular articulation with the correspondence of grade level expectancies and achievements. This is skillfully displayed for prospective parents on our website, but was not included in the original application as we had

been warned not to submit anything new or exceed 2,000 words in the Initial Proposal Amendment phase.

• PBL as the crux of the school's instructional, description of how the school will use PBL to achieve its stated academic goals. (Page 4)

In section IIIB-2 our application outlines seven specific academic goals and in Section III-B7 we describe the ways PBL connects with our goals. Our team is happy to reemphasize that connection through the following table.

Academic Goals (iLEAD Kauai students will)	Connection to PBL	Supporting Evidence
go beyond academic achievement by demonstrating engagement, 21st century skills and lifelong learning	"Learners need to use higher-order thinking skills and learn to work as a team. They must listen to others and make their own ideas clear when speaking, be able to read a variety of material, write or otherwise express themselves in various modes, and make effective presentations. These skills, competencies and habits of mind are often known as "21st Century skills." (Pg.14)	Ravitz, Hixson, English and Mergendolller, (2012)
engage in critical thinking and master age appropriate Common Core and Hawaii Content Performance Standards in ELA, Mathematics, Social Studies and Science	"Goals for student learning are explicitly derived from content standards and key concepts at the heart of academic disciplines;" (Pg.14)	Miller, ASCD, (2012)
engage in inquiry and investigation as part of the process of learning and creating something new. (student engagement)	"Common Core focused PBL is a systematic teaching method that engages students in learning knowledge and skills through an extended inquiry process structured around complex, authentic questions and carefully designed products and tasks." (pg.14)	Belland, et al., 2006; Brush & Saye (2008).
demonstrate independence and cooperation when making sense of problems and persevering to solve them.	"They need to use higher-order thinking skills and learn to work as a team. They must listen to others and make their own ideas clear when speaking." "Students learn to work independently and take responsibility when they are asked to make choices" (Pg.14)	ChanLin (2008) Facilitating Learning in a Student-Driven Environment (Keys to PBL Series Part 4)
read with comprehension, write effectively, and communicate in a variety of ways and settings and with a variety of audiences.	These skills will be further utilized in PBL but will be explicitly developed through Units of Study for Primary Writing, Daily 5 / CAFÉ, Words Their Way (K-5th grade), and Reading Workshop Practices (page 11)	Calkins (1994) Lienhardt, et al. (1981) Pressley (2006)
revise and reflect to make	"Students learn to give and receive feedback in	Berger (2003)

"beautiful work."	order to improve the quality of the products they create, and are asked to think about what and how they are learning."(Pg.14)	
use technology effectively and ethically will be able to make personal, practical and global connections with their learning.	"We use technology in the classroom so children quickly become familiar and at ease with these technologies while utilizing them to learn and communicate." (pg.5) Technology is also used in support of challenging projects, as learners research and demonstrate their understanding by using different technological tools which contributes to students' sense of authenticity and to the "real-life" quality of the task at hand	50 ways to integrate technology for PBL and student Projects

In addition to the table of goals and PBL connections, we stress that the Common Core standards emphasize creativity, collaboration, critical thinking, presentation and demonstration, problem solving, research and inquiry, and career readiness. Project-based learning is uniquely designed to provide this greater focus on *depth* rather than coverage, *thinking* rather than memorizing or listing, and *demonstrating and performing* rather than pencil and paper learning activities, making it the perfect framework for iLEAD Kauai's instructional design. David Ross, Director of professional development for Buck Institute for Education, states the following about the alignment of PBL and the Common Core: "Everyone knows that content is king and Common Core wears the crown. Significant content is one of our eight Essential Elements of PBL. Significant Content = Common Core. When designing a rigorous, relevant, and engaging project, Common Core is the *what* and PBL is the *how*".

iLEAD Kauai will use the following six key steps to implement the integration of Project-Based Learning and Common Core Standards and these steps describe how we will use PBL:

- 1. Moving from instruction to inquiry. Curriculum will start with questions rather than delivery of information. PBL teachers begin by posing a significant challenge to students and capturing the challenge in a manageable problem statement or driving question. The question frames the project; the problem sets the solution process into motion.
- 2. Balancing knowledge and skills. The Common Core State Standards rebalance the equation between content and skills. The emphasis is now on a blend of knowing/doing and learning/demonstrating, in which students apply what they know and demonstrate mastery of 21st century skills, such as presentation and collaboration. This shift changes expectations for student mastery, rearranges assessments and grading systems, and relies on coaching students for better performance.
- 3. *Going deep*. Deep thinking can conflict with current testing requirements, which do not reward insight and analysis. PBL approaches this challenge by assessing fewer standards (the goal of the Common Core), using a variety of proven thinking tools, and designing a controlled process that helps students focus their thinking on the driving question.
- 4. *Teaching teamwork*. The Common Core State Standards identify collaboration and teamwork as a 21st century skill to be taught. iLEAD Kauai will establish a collaborative culture of continuous learning within networked communities. Our PBL trained teachers will use contracts, peer collaboration rubrics, and work ethic rubrics to turn group work into effective teams.

- 5. Establishing a culture of inquiry. iLEAD teachers will empower students how to take charge of themselves, to respect the inquiry process, and to become self-directed learners. A careful blend of assessments and tools will promote the development of self-awareness, respect, self-control, and other attributes of a functioning community.
- 6. *Blending coaching with teaching*. Teachers will work shoulder to shoulder with students, giving them feedback, questioning them, and urging them on to the next level of achievement.
- The Middle School rationale for a mixed grade-level classroom, description how the school will deliver standards-aligned instruction (Page 4)

Our iLEAD Kauai team was unable to locate an appropriate area in the application to provide the rationale for a mixed grade-level classroom or describe how the school will deliver standards-aligned instruction in this type of learning environment. Therefore, we appreciate the opportunity to clarify. At iLEAD Kauai, multi-age grouping for learning occurs in much the same way learners will participate in groups in the community or the workforce. Students also are grouped so they have the opportunity to observe, learn from and model the skills of other students. Younger students grow as they work with older classmates, and older students experience deeper learning when they share what they know with younger students.

According to the research, Miller (1990) found there to be no significant differences between single-grade and multi-grade classrooms for academic achievement therefore showing multi-grade learning to be an equally effective organizational alternative to single-grade instruction. However, for social emotional learning, 81% of studies reviewed, favored the multi-grade classroom (Miller, 1990). Furthermore, Lloyd (1999) and Mason & Burns (2002) found that combined grade classes may include a greater number of high achieving students and independent learners. Finally, benefits of multiage classrooms include increased affective learning, such as improved self-concept, increased pro-social behavior, greater responsibility and more positive attitudes toward school. Increased opportunities for leadership and peer learning are also cited (Gutierrez & Slavin, 1992; Miller, 1991; Pardini, 2005). At iLEAD Kauai, we believe that developing these characteristics are paramount, especially as our students move through the uncertainty and insecurities of adolescence.

To deliver standards-aligned instruction to our students in the multiage classroom, our teachers will spend more time in organizing and planning for instruction. This extra time will be built into the schedule for half-time teachers whose workload is half that of a full -time teacher and whose preparation periods are equal. Additional coordination allows the teachers to meet with small groups or individuals, while other work continues. In this organization, our teachers will share instructional responsibilities with students, and in the context of clear expectations and routines, shared responsibility will be productive. Students will know what assignments to work on, when they are due, how to get them graded, how to get extra help, and where to submit assignments. Students will also learn how to work collaboratively and independently.

In reference to delivering standards-aligned instruction in this context, Common Core is vertically aligned, which facilitates this process well. The first step for teachers is to deepen understanding of the Common Core State Standards (CCSS) and interpret across grade levels. Teachers will determine how a student will demonstrate competency and design driving questions that are open ended where all grade levels can reach standards within a concept. As mentioned in section IIIB-2 of the application, when designing projects our teachers will use backwards design (UbD) that begins with outlining expected results or products to assist students

in understanding the details involved to establish a pathway to follow. Within the confines of teaching separate lessons, CCSS delivery in a multi-age setting would most certainly be overwhelming, however by implementing PBL as our model, teachers will have the ability to deliver integrated, thematic standards-based units of study which will contribute to a greater sense of freedom, flexibility and responsibility.

• Academic success at iLEAD Schools' charter schools, Fall 2014 assessment data for iLEAD Schools' longest-running school ("SCVi") in California, comparison to California statewide data percentiles in reading and below the 40th percentile in math. (Page 4)

As mentioned earlier, the emphasis at our schools is to develop each student's academic skills and abilities yearly to the end goal of being career/college ready. Often, students who do come to iLEAD are attracted to our model because they have had challenges in more traditional educational settings. With this in mind, baseline percentile scores display these challenges. However, success of our efforts is evidenced in the following NWEA MAP chart. The following data is further breakdown of the data presented in the Request for Clarification document.

SCVi -% of	SCVi -% of RIT Scale <i>Growth</i> in NWEA MAP Tests - Fall 2013 -Fall 2014					
Grades	SCVi % Growth (Reading)	Normed Mean % of Growth (Reading)	SCVi % Growth (Math)	Normed Mean % of Growth (Math)		
1	7.80%	9.73%	9.57%	9.45%		
2	2.37%	7.95%	5.37%	7.80%		
3	9.18%	5.21%	7.51%	6.09%		
4	7.39%	3.65%	3.43%	4.46%		
5	2.76%	2.51%	3.65%	3.14%		
6	1.65%	1.88%	2.97%	2.73%		
7	3.87%	1.38%	2.66%	2.03%		
8	3.26%	0.95%	2.39%	1.56%		

By looking at the data we can see that from Fall 2013 to Fall of 2014 students at SCVi, our longest standing iLEAD school, grew in every grade level in the areas of Math and Reading. In fact, SCVi students exceeded the nationally normed % of RIT growth in 5 out of 8 grades in reading and 6 out of 8 grades in math. Second grade was an outlier in reading for this reporting year, and for this reason, teachers and the student support team worked together to create a strategic intervention plan to close the achievement gap. The result was a 5.41% growth in reading for this same group of students the following year, which is more than double the percentage of growth from the previous year. The data trend also shows twice the percentage of growth in grades 7 and 8 in relationship to national norms over time. This may be contributed to two factors:

1.students increase performance over time as their needs are more specifically met in our specialized learning model.

2. In a study performed by Needham (2010) comparing standardized test scores of traditional students with PBL students findings showed that "students chose correct answers at higher levels of difficulty for the PBL classrooms while the control classroom chose more correct answers at the lower levels of difficulty." With this in mind, our students perform better as content complexity increases over time.

However, rather than measure our schools through a California lens that is disconnected to the realities of the Hawaii educational and measurement system, it would be more appropriate to look at our school through the Hawaii Strive Hi system. The Hawaii DOE Strive HI website states: "In our estimation, it's about more than scores on high-stakes tests. Schools should demonstrate that they're supporting all children along the educational pipeline toward college, career and community readiness. Are they attending school? Are they graduating? Are they going to college? Students should be able to demonstrate proficiency, but are they also showing growth? And how successfully are schools reducing the achievement gap between high-needs and non-high-needs students?" iLEAD Kauai could not be in stronger alignment with this philosophy and method of determining the success of a public school.

The Strive HI Index measures school performance and progress, using multiple measures including:

- Student achievement: HSA reading and math scores; end-of-course science assessments.
- Readiness: Chronic absenteeism; 8th and 11th grade ACT scores in reading, English, math and science; high school graduation rates; and college enrollment.
- Achievement gap: Reducing the gap between "high-needs students" (those who have a disability, language barriers, or low family income) compared with the achievement of other students.

The targets above denote areas in which iLEAD Kauai anticipates outstanding success, reflective of the success at other iLEAD Schools. At these schools, attendance rates average 94%, During 2014-15 school year the graduation rate was 100%, and in 2015-16 the graduation rate was 98% (the only student not fulfilling graduation requirements experienced chronic illness resulting in extended hospitalization). Furthermore 74% of our 2014-15 graduating class was accepted to four-year universities. These statistics include our special education and English language learner populations as well as our low-income students.

Attendance, graduation and college attendance rates, in addition to iLEAD's continual overall growth in math and reading, can be compared to Kapaa-Kauai-Waimea Strive Hi Complex Area Summary data that indicates the following: 47% of schools declined in math proficiency, 87% of schools declined in reading proficiency, graduation rate was at 82.2%, and college attendance rate was at 67%. With all this in mind, we are confident in our ability to reduce achievement gaps on Kauai and build positive data trends by fulfilling learners' needs through our specialized deeper learning education model.

• The Academic Plan- A clear, comprehensive plan for assessment on identified metrics, formalized process for monitoring student progress, course outcomes, ILPs- description, development to ensure continued student progress (Page 5)

While iLEAD Kauai will measure student progress in multiple ways, we understand that it is not the quantity of data that is collected, but how it is used. As Carol Ann Tomlinson so aptly states, "Assessment is today's means of understanding how to modify tomorrow's instruction." Detailed curriculum maps and a scope and sequence will ensure that standards are aligned across the grade levels. Teachers will integrate Common Core standards when planning the projects and these standards will be used when students are self-assessing and teachers are formatively assessing throughout the learning process. Assessments aligned to additional academic goals and metrics (listed in Attachment D) will track a student's progress toward proficiency by providing data acquired from the monthly and quarterly standardized benchmark assessments, teacherdevised authentic assessments, longitudinal testing (pre-tests, post-tests, etc.) and state standardized test (listed in section IIB-3). NWEA MAP also includes a database, which gives additional information for teachers to use when making instructional decisions to support their learners and the ability to import assessment results into Excel spreadsheets for a more holistic view of student performance. Performance on these assessments that align to the outcome, will be communicated with students to give accurate feedback and encourage student ownership of the learning. Teachers will be allowed sufficient time to analyze data in order to maintain thorough records of individual student progress. This data will be reflected upon in regular meetings with the school director, and analyzed by the data analysis leadership team in order to drive instructional practices and inform teachers so that they can target learning needs to improve each student's academic performance.

The IES National Center for Educational Evaluation and Regional Assistance, offer several suggestions to effectively use students achievement data to support instructional decision-making. In the following table we list these suggestions and compare them with our proposal.

IES Suggestions	iLEAD Kauai Proposal - Academic Plan Design and Capacity
Incorporate a data system that from various sources	LEAD Kaua'i will use multiple assessment measures and strategies to gain essential information about each student including student academic progress, social/emotional growth, student learning styles and preferred instructional methods. In addition, assessment will be used to guide the development of individual students, monitor progress, and continuously improve the quality of the educational program. (p. 8)
Compose a data team that encourages the use and interpretation of data	A Professional Learning Community will also be formed to analyze the data specific to our learners and decide what evidence-based learning experiences will address student needs, interests and learning styles, collect evidence of student learning, analyze student work to inform instruction or provide feedback, and evaluate student work, make judgment, and communicate findings (pg.10)
Encourage collaborative discussion sessions among teachers about data use and students achievement	Throughout the school year, protocols will be used to encourage dialogue amongst staff and the school leadership team. To ensure open lines of communication between teachers, we will hold monthly leadership Hui (PLCs) in which teachers break into groups, organized around themes such as curriculum, culture, assessment, etc. and share back their plans/actions with the larger group. (pg.18)
Instruct students about how to use their achievement data to set and monitor goals	Using assessment data to include school and state mandated assessments including the NWEA MAP, Fountas & Pinnell Reading Benchmark Test, Words Their Way Spelling Inventory, Learner Profile Self Assessment, and Common Core Writing Samples. Based on these samples, the teacher, parent, and student collaborate as educational

partners to establish goals and strategies that are challenging and achievable.

The Individual Learning Plan (ILP) is a personalized document that the student develops with his/her teacher and parents/ guardians. It is a living document that connects the student's past, present, and future to his/her learning.

Past – Evidence of learning in the assessment portfolio and former ILPs Present – The present status of the student in specific subjects or competencies

Future – Identifying the strategies and tasks lying ahead to achieve the ILP goals

The ILP then becomes the guiding document for the student and teacher as they work together over the course of the school year to achieve those goals.

Key questions for developing an ILP

In essence, teachers, in conjunction with students, parents/family and other support people, construct an ILP for a student by answering four key questions:

- Where is the student now?
- Where should the student be?
- How will they get to where they should be?
- How will we know when they get there?

Progress toward goals is measured throughout the year and communicated to students and parents formally in the 1st Semester Report of Progress, Student-Led Conference, and Year-End Report of Progress, in addition to interim check-ins and self-reflections throughout the year. The ILP increases students' knowledge and understanding of their own academic and social-emotional progress and also allows them to influence and take responsibility for their own learning. When students achieve the stated goals, they can advance to the next level at any time during the school year due to the educational program, which is tailored to the individual needs of the student. While they may not formally advance to the next grade until the end of the school year, our multi-age classrooms differentiate instruction, which allows a child to learn at his/her own level. Students may also join another grade-level classroom for a portion of the school day in order to access instruction that best meets their own personal needs.

- The Academic Plan- a clear and comprehensive plan for how instructional leaders and teachers will administer, collect, and analyze the results of diagnostic, formative, benchmark/interim, and summative assessments to inform programmatic and instructional planning decisions and make adjustments to curricula, professional development, and other school components, school information system (Page 5)
- As stated in section IIIB-4, iLEAD Kaua'i is in the process of exploring several School Information System(s), including the one being designed by iLEAD Schools and others that already exist such as: School Pathways. These systems have the capacity to create a variety of reports on student achievement, including disaggregated data by content strand, student subgroup, grade level, and classroom. NWEA MAP also includes a database, which gives additional information for teachers to use when making instructional decisions and import assessment results into Excel spreadsheets for a wider lens on student performance. Finally, it is also our understanding that the Hawaii DOE has selected "CAMPUS", a new accountability system, which will begin implementation in 2016-2017. There will be training on this new system for all schools within our DOE system and we will actively participate.
- Overall, the Academic Plan tools that iLEAD Kauai intends to use, description how and why the tools are being used (Page 5)

We have selected tools to assist in the assessment process of individual students because they specifically provide "growth" reports, academically and socially. DOE teachers are trained to interpret math and literacy data, which does guide the instruction. Academic goals will be monitored through the various assessments administered by the teachers and will have on-going training from the DOE regarding specific strategies. It should be noted that Kauai Superintendent Arakaki and Samuel Ka'auwai of Kawaikini Charter School have expressed a desire for our iLEAD team to do professional development training in design thinking and deeper learning for DOE teachers. Our superintendent has stated, "other outside academic experts are proponents of design thinking, which brings about a deeper understanding of academic goals and we need this for our district". We are encouraged by the request for sharing professional development and are more than willing to partner with other Kauai DOE schools in current research and the latest methodologies for academic achievement.

Organizational Plan

- The Organizational Plan overview (Page 6)
 We would like to reiterate that the evaluation team's organizational concerns are focused mainly on the middle school section of our application, which we will further explain below.
- The Organizational Plan-recruitment and hiring strategy to meet ESEA requirements for being "Highly Qualified," middle school grades taught as a combined class made up of grades six through eight, staffing, additional professional development, sound procedures for hiring school personnel, two half-time teachers licensed in all four core subject areas (Page 6)

 Please allow us to clarify our intentions to staff, plan and hire for our middle school. iLEAD Kauai will hire two HQ teachers to staff our middle school. We will support these teachers to become HQ in a second area and given the time that we have available between approval and opening, we should be able to accomplish this by the start of the first school year in order to be at 100% HQT status. As mentioned earlier, we have already located three eligible candidates who are willing to work half-time and have affirmed their interest. If for some unforeseen circumstance we were unable to bring this plan to completion before the start of the school year, our HQ percentages would be closer to that of the three current public middle schools on Kauai whose HQ Teacher percentages are as follows: True North Logic HQT reporting-6/24/2015: Chiefess Kamakahelei Middle School-79.32%, Waimea Canyon Middle School-78.18%, Kapaa Middle School-70.56%.
- Middle School Division- highly qualified and licensed teachers in all of the four required subject areas, half-time employment, master collective bargaining agreement between the Hawaii State Teachers Association and the State, 17.5 hours instructional time including teacher preparation time, and daily lunch time (Page 7)

 In reference to hours worked in the day, according to the HSTA contract, daily lunch time for half-time teacher is only scheduled "where appropriate" and given the fact that our teachers will work half of the day, lunch would not be appropriate. Therefore the two middle school teachers will equally split instructional time from 8:25-3:00 M-Th and from 8:25-12:00 on Fridays. This equals to a total of 29 hrs and 55mins. If we reduce that number by 30 minutes daily to account for lunch (2 hours total M-TH), the total weekly amount of hours is 27 hours and 55 minutes. Dividing this workload in half would be 13 hours and 58 minutes/ teacher. If we add the additional 45 minutes daily for planning periods for each teacher (total-weekly 3 hours and 45

minutes/teacher), the total amount of hours per week for each teacher is 17 hours and 43

minutes. In this case, the extra 13 minutes of work time can be mitigated with specials, recess, or other scheduling solutions.

Financial Plan

• The Financial Plan Overview (Page 8)

Our team recognizes that the enrollment is so intricately connected to the financial viability of the plan. Therefore, both iLEAD Kauai and its non-profit, iLEAD Hawaii will be involved in school-wide fundraising from the moment our Charter is approved. Also, once approved, we will have the ability to contact Grantors such as OHA, Atherton Foundation, Chamberlin Foundation, Kamehameha Schools, Scheidel Foundation and other organizations as well as individual philanthropists.

- Loans or lines of credit associated with the non-profit (Page 8)

 After thoroughly researching the evaluators' comments, we could not locate any law/rule that would prohibit its non-profit from loaning monies to the school. Other charter schools in Hawaii receive monies from their non-profit and then the charter school pays the funds back in various forms such as equipment lease, rent, etc. However after consulting with Executive Director of the Hawaii Charter School Network, Lynn Finnegan, we now understand that this discrepancy has resulted from a misunderstanding of a regulation applying to state entities that also applies to charter schools. In actuality, our institution does not intend to exercise any type of loan but rather to rely heavily on fundraising efforts. However, if for some unforeseen reason we were unable to generate necessary funds, our team would appeal to the governor or work out a scenario with the non-profit that would obligate them solely for the loan. Individuals and other entities have also
- A contingency plan with specific actions for revenues lower than anticipated, the actions the school would take should it fail to meet enrollment targets by a somewhat substantial amount, such as 10-15%. (Page 9)

expressed a willingness to help support the team financially upon an approved charter.

The contingency plan is an illustration of the partnership between iLEAD Kauai, the ESP, and the non-profit. In the unlikely event that enrollment falls below our projections in Years 1-3, the ESP has discussed potential willingness to forgive any shortfall of enrollment until we are in a more stable position. Since the majority of revenues in the budget are state per pupil funds, enrollment is the driving force behind the revenue projections. With the assistance of the ESP, iLEAD Kauai will be able to reduce its expenses (using a reduced management fee) based on the enrollment if it falls below the projections. Since the fee will be reduced by the lower amount of the per pupil revenues, the school will not need to trim staff and/or expenses as proposed in the budget.

Evidence of Capacity

• Evidence of Capacity Overview (Page 10)

The capacity to write a charter involves an important and specific skill set, which may not have shown through as clearly due to challenges in understanding the expectations of the application. However, we are confident in our capacity to carry out the proposed plan effectively. Furthermore, the evidence submitted during the Public Hearing should demonstrate that our iLEAD Kauai team has also inspired confidence in the Kauai community (700+ signatures), government leaders (Senator Kouchi, Representative Kawakami, Councilwoman JoAnn Yukimura, Mayor Bernard Carvalho, Administrator Jay Furfaro), school leaders, (Superintendent Bill Arakaki, Paul Zina- Ele`ele Elementary School Principal on our advisory board, and

Caroline Freudig – DOE District teacher rep and member of the iLEAD Kauai Hui), and a multitude of teachers. Most importantly, we have inspired confidence in the parents of the 165 keiki who intend to entrust iLEAD Kauai to educate their children. Since we have only 125 open slots, we have temporarily discontinued our efforts to collect even more *informal* intentions for enrollment at this time.

One key theme of the iLEAD Schools model is collaboration. They have implemented this theme in each of the different sites, which are identified as being an iLEAD school. According to Spinuzzi, a blog about rhetoric and research, "Collaboration and collective efforts are often confused, but they are not similar and they are two distinctly different efforts. Collaboration is people working together (often with a common goal) to build one thing. Collective efforts are the aggregation of people's individual efforts, sometimes in the same service, but do not have common goal or common effort. "With this in mind, we agree that as a collective, we may have failed to instill confidence in our ability to successfully open a charter school because, rather we are a team "collaborating" towards a common goal: the existence iLEAD Kauai for the good of our community and keiki.

To reiterate our individual qualities that we each contribute to this common goal; Dr. Kani Blackwell, a professor of education at UHM, has personally worked in all our Kauai schools and prepared 65 Kauai teachers who are now teaching in our schools as highly qualified teachers. She also opened a charter (magnet) school in 1981 in California where she was an administrator for eight years. That school is still in operation today. Our proposed school director, Ms. Deena Fontana Moraes, who was born and raised on Kauai, has been an HTSB licensed teacher for 12 years. In addition to teaching in the Hawaii DOE, she has business startup experience as well. She also founded and conducted an independent bilingual arts program as part of an international education school in Brazil. Most recently she has been preparing to be the iLEAD Kauai school director serving as an administrator at iLEAD Lancaster Charter School. Ms. Moraes and Dr. Blackwell will be collaborating closely in school leadership and administration decisions as the school moves through start-up and the first years of operation. Stu Rosenthal, an effective Business Manager and Transportation Supervisor for Kawaikini Charter School, will become our business manager. In addition, the Hui is comprised of four DOE teachers with each having five to 25 years in educational experience. The parents involved are leaders in the community and have given us great input as to what parents expect for their children. The governing board will be most instrumental in the success of the start and implementation stage of iLEAD Kauai and the Chair of the governing board, Dr. James Dire is Vice-Chancellor of Kauai Community College, an academic leader with extensive Board experience. Working together as a team of administrators, teachers, and parents will provide the collaborative effort to provide a quality education for the keiki of Kauai.

• The academic team's ability to develop, articulate, and implement a cohesive Academic Plan that is, a rigorous academic program implementing various standards, assessment tools, student goals, and curriculum (Page 10)

The academic plan is cohesive but may have not been as articulated as well as we should have. Most of our evidence of cohesiveness and alignment are shown through curriculum mapping, graphs, and other materials that were unable to be uploaded in the limited technology application system. We were concerned about introducing "new" information in our 2,000-word explanation for we had been warned not to submit anything new. A point in question is our

extensive scope and sequence, which depicts the breadth of subject matter with cross-curricular articulation with the correspondence of grade level expectancies and achievements. This is displayed for prospective parents on our website, but was not included in the original application as we were told we could not submit it with our 2,000 words during the final phase. The rigorous academic plan is demonstrated through project-based demonstrations called Presentations of Learning (POL), where students connect the common core standards to their project, and demonstrate how they failed and succeeded in various attempts, or experimentation in the goals they had identified while learning from doing their project. Competency-based, mastery of material and subject matter is stressed more than rote learning. Project-based learning deviates drastically from traditional worksheets and "end of chapter question answering" routine. With this in mind, it is extremely important to look at brain-based research of Constructivist Teaching and mastery level attainment to understand the foundation behind our proposal.

- *iLEAD Schools evidence of the academic success of its educational program. (Page 10)* In addition to the evidence presented in the academic section, over 80% of parents at iLEAD Lancaster reported on 2015 year-end surveys that their learner desires to attend school every day. Waitlists, almost as long as enrollment lists, tell of the satisfaction of both schools' students and parents. Additionally, iLEAD Schools Development has been approved to open three more schools in Ohio and two more in California. They also are an approved IB World School and have received the highest WASC accreditation available. iLEAD Kauai is not proposing to compete with Punahou School and have one of our graduates be the next president, but our graduates will be leaders and will be prepared with 21st Century skills. Kauai has clearly articulated that they want and deserve this innovative model of education.
- The organizational team's ability to implement the Organizational Plan successfully, a realistic hiring strategy resulting in federal HQ and state licensed teaching staff (Page 10) During the interview, one of the challenges our iLEAD team members mentioned was that of supply and demand for positions at our school. So many highly qualified teachers have openly expressed the desire to teach in our proposed iLEAD Kauai Charter School and we will have limited positions. President Obama stated a pertinent quote applicable to all schools, "From the moment students enter the school, the most important factor in their success is not the color of their skin or the income of their parents, it is the person standing at the front of the classroom." Barack Obama, 2009.

All our hires will be highly qualified according to ESEA requirements for K-6 and the middle school teachers will be HQ in two areas. In addition, our model has a specific and intensive hiring strategy in place referred to as our "Star Search." The candidate selection is the result of a collaborative decision making process by the school's interviewing team. By implementing our motto: "with roots in the islands and wings for the world", our learners will be free to think and inspired to lead. The results will be confident, well-educated, community-minded graduates who are ready for careers, college, and our 21st Century society. iLEAD Kauai is ready, willing and able to implement our innovative, high quality charter school for Kauai and we look forward to your approval.

<u>Exhibit C</u> Evaluation Team Rebuttal for iLEAD Kauai



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

Charter Application for iLEAD Kauai – Alakai O Kauai Charter School

Evaluation Team

Team Lead: Danny Vasconcellos

Evaluators: Beth Bulgeron

Jeff Poentis
Kirsten Rogers
Kenneth Surratt
GG Weisenfeld

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

In the response, the applicant acknowledged several times that iLEAD Kauai had difficulty clearly articulating the vision of the school and the academic plan in the application. This lack of clarity left the Evaluation Team without an understanding of how the academic pieces of the school would fit together.

The Final Application Recommendation Report states that the applicant failed to describe how project-based learning ("PBL") would be used to achieve its proposed academic goals. In the response, the applicant reiterated how the school's academic goals connect to its instructional design, which is focused around PBL. The applicant lists six steps that will be used to implement the integration of PBL and Common Core State Standards and also describes how PBL will be used. The steps provide vague actions (such as using rubrics, empowering students through a blend of assessments and tools, and working shoulder to shoulder with students) that fail to describe a comprehensive framework driven by Common Core State Standards.

This lack of clarity and focus continues in the applicant's response regarding the addition of the middle school grades. However, the response fails to address the Evaluation Team's concern that the addition of middle school in Year 1 is a major amendment that affects all areas of the application, and the applicant failed to provide a sound hiring plan that meets state licensing and federal Highly-Qualified ("HQ") requirements. The response reiterates the staffing plan, which calls for the hire of two half-time teachers for the middle school grades. Though the applicant says that it has candidates for these positions, there are still concerns regarding the licensing and HQ requirements. The applicant acknowledges these concerns by citing HQ percentages of middle schools on Kauai, which it claims are in the seventy percent range, and stating that the proposed school's percentage could be the same. This response reinforces the Evaluation Team's concerns regarding the middle school staffing.

Another item in the response that the Evaluation Team would like to offer a rebuttal to is the performance of schools managed by iLEAD Schools Development ("iLEAD Schools"), as evidenced in the performance of one of the iLEAD California schools. The response provides data from the NWEA test that illustrates growth above the national norm in five of eight grade levels provided. It appears this data is a reinterpretation of data that was presented in the Request for Clarification. However, the Evaluation Team was unable to determine how this data was derived and its accuracy. As such, the Evaluation Team cannot consider this data and the claims being made by the applicant. Therefore, the concern remains that that the academic performance of iLEAD Schools is not strong. When compared to the nationally-normed data, every tested grade level performed below the 50th percentile in reading and below the 40th percentile in math. The inability of the applicant to provide evidence of the success of its project-based learning model remains a major concern and does not support the proposed academic methodologies. As a result, the Evaluation Team continues to question iLEAD Schools' academic performance and the effectiveness of its project-based learning model.

New information not considered by the Evaluation Team

A considerable portion of the applicant's response is new information that is not included in iLEAD Kauai's application. As such, a great deal of information in the response could not be holistically considered by the Evaluation Team. This includes information on the rationale for a mixed-age classroom, the analysis connecting the academic goals and curriculum, HQ percentages of middle schools on Kauai, IES National Center for Educational Evaluation and Regional Assistance suggestions, and a contingency plan regarding a reduced management fee.

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