

NEIL ABERCROMBIE  
GOVERNOR



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STATE OF HAWAII  
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## RECOMMENDATION SUBMITTAL

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DATE: May 8, 2014

TO: Catherine Payne, Chairperson

FROM: Mitch D’Olier, Chairperson  
Applications Committee

AGENDA ITEM: Action on Charter School Application for IMAG Academy

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### I. DESCRIPTION

That the Commission deny IMAG Academy 2013 charter school application.

### 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:** IMAG Academy

**Mission:** Our mission as a K-12 public charter school is to provide a small, family-like environment to prepare mindful citizens capable in excelling in college, career and life through creating a continuum of experiences where the strengths and potential of the individual and community can flourish.

**Vision:** IMAG Academies are community resources raising generations of innovative, mindful, accepting, and giving citizens grounded in their knowledge and capabilities to create and sustain successful and peace-filled communities. An Academy would provide youth the permission to dream, environment to thrive, confidence to succeed, skills to act and the expectation to create a collaborative and peace-filled society!

**Geographical Area:** Waipahu complex, which spans six square miles from Leeward Community College to the entrance of Ewa.

**Program Synopsis:** IMAG Academy identifies its school model as specializing in college prep, STEM, and V-BASE. IMAG Academy’s academic plan is still in its conceptual phase but intends to incorporate various frameworks, including International Baccalaureate (an international education program focused on creating intercultural understanding), Conscious Discipline (a social and emotional development framework), and V-BASE (Value Added Business, Arts, Science, and Engineering). The school’s culture will be defined by IMAG (innovation, mindfulness, acceptance, and giving).

**Enrollment Summary**

Grade Level	Number of Students					
	Year 1 2015	Year 2 2016	Year 3 2017	Year 4 2018	Year 5 2019	Capacity 2020
K	60	60	60	60	60	60
1	0	60	60	60	60	60
2	0	0	60	60	60	60
3	0	0	0	75	75	75
4	75	75	75	75	75	75
5	50	75	75	75	75	75
6	50	50	75	75	75	75
7	0	50	50	75	75	75
8	0	0	50	50	75	75
9	0	0	0	50	50	75
10	0	0	0	0	50	75
11	0	0	0	0	0	75
12	0	0	0	0	0	75
<b>Totals</b>	<b>235</b>	<b>370</b>	<b>505</b>	<b>655</b>	<b>730</b>	<b>930</b>

**IV. BACKGROUND**

On January 6, 2014, a community group submitted a charter application for the proposed charter school IMAG Academy. The Evaluation Team assigned to the IMAG Academy application was comprised of Doug Muraoka, Nikki Trautman Baszynski, Ray L’Heureux, Leila Shar, and Danny Vasconcellos. In conjunction with the application, the Evaluation Team reviewed the applicant’s responses to the Request for Clarification and interviewed applicant group members. The applicant group members that attended the interview were Momi Akana, Sheila Buyukacar, and Cheryl Cudiamat.

After evaluating the information presented in the application, Request for Clarification response, and capacity interview, the Evaluation Team published its Recommendation Report. The applicant exercised its option to write a response to the Recommendation Report, and the Evaluation Team

drafted a rebuttal to that response. The Recommendation Report (**Exhibit A**), Applicant Response (**Exhibit B**), and Evaluation Team Rebuttal (**Exhibit C**) make up the Recommendation Packet.

In addition, the Commission held a public hearing on the application on March 13, 2014. Eight concerned individuals submitted written testimony in support of IMAG Academy, and Ms. Buyukacar provided oral testimony in support of IMAG Academy.

### **Recommendation Report.**

The Evaluation Team recommends that the application for IMAG Academy be denied. The Recommendation Report states that the academic plan, organizational plan, financial plan, and evidence of capacity fall far below the standard of approval and concludes that sections of the application are “not fully developed or aligned to reflect a comprehensive plan for a viable school.”

The report notes that the application “fails to describe the curriculum or a plan to develop curriculum, other than to [apply for the International Baccalaureate program].” Other key concerns about the academic plan include:

- The absence of a plan to align with Common Core State Standards; and
- The overall coherency of the academic plan and the applicant’s capacity to implement it.

The report’s concerns regarding the organizational plan are in large part due to the gaps in facility and location planning; specifically, the applicant proposed various sites, each which would result in different student populations surrounding the school. Other key concerns about the organizational plan include:

- Depending on the location of the proposed school, the absence of food service because of a possibly high population of Free and Reduced Lunch students; and
- A lack of evidence of community support, especially since the application stresses the importance of community engagement.

The report states that the budget is unrealistic and not reviewable. Key concerns about the financial plan include:

- A sole reliance on grants for start-up year funding without evidence of the applicant having even researched grants;
- An unrealistic teacher/adult to student ratio at current funding levels;
- The uncertainty of a proposed facility, which hampers any real cost analysis;
- A lack of clarity whether the budget is based on the maximum projected enrollment and the absence of a contingency plan should enrollment not meet projections; and
- A lack of financial expertise.

The report states a number of areas in which the applicant lacks capacity, including:

- The proposed school leader, who lacks experience as a school administrator;
- The lack of experience and understanding of opening and running a public charter school; and
- Financial expertise, as the “key financial advisor” does not possess the necessary experience.

Moreover, the report states that the Evaluation Team was unable to fully evaluate the capacity of the governing board, as not all the applicant group members that were scheduled to appear at the interview showed up.

### **Applicant Response.**

The Applicant Response acknowledges that parts of the application are “confusing from an outsider’s point of view and others not fully developed.” The applicant also shares what it sees as issues with the application process, such as not being allowed to distribute informational binders at the capacity interview. Still, the response attempts to clarify the key concerns brought forth in the report.

In regard to the academic plan concerns, the response:

- Identifies the curriculum development plan included in the application;
- Notes that a contingency plan is not necessary should the application for International Baccalaureate (“IB”) program be delayed or not approved, as the use of the IB framework would continue nonetheless;
- Identifies sections of the application which explain the applicant’s intention to align the curriculum with Common Core State Standards;
- Argues that the “holistic school-wide practices ensures and enhances a coherent academic plan;” and
- Points to the resumes of three governing board members as evidence of the applicant’s capacity to implement its proposed academic plan.

In regard to the organizational plan concerns, the response:

- Acknowledges that information about an ideal facility and growth plan was left out of the application;
- Justifies the various proposed locations as an attempt to be transparent with evaluators in the hope that any concerns would be discussed;
- Acknowledges that the absence of food service would be a problem in certain areas and notes that finding a certified food service provider would be the first option to address this issue; and
- Notes that the current level of community involvement is “rooted by [the] applicant team’s ties to the community.”

In regard to the financial plan concerns, the response:

- Notes the grant assumptions used in the application are based on “several sources of information” but provides revised assumptions based on continued research;
- Justifies the teacher/adult to student ratio by pointing to a section in the application that explains that a teacher assistant will be hired for every two regular full-time teachers;
- Acknowledges that information about facilities costs were not clear in the application and provides information that should have been included in the application;
- Notes that the budget is based off of the maximum projected enrollment and that the applicant’s response to the Request for Clarification lists “major areas” to increase revenue or decrease expenditures; and

- Notes that the resume of the applicant's "key financial advisor" was not included in the application.

In regard to the capacity concerns, the response:

- Acknowledges the fact that the proposed school leader lacks experience as a school administrator but points out that the skills sets involved in starting a charter school are not necessarily the same as those of traditional school administration and characterizes that the report's description of her background is too "limited;"
- Notes that the report's descriptions of key board members are "limiting and vague;"
- Notes that the questions asked in the Request for Clarification and capacity interview did not reflect the major concerns illustrated in the report;
- Notes that the Evaluation Team never evaluated the resume of the "key financial advisor," as it was not included in the application; and
- Notes that the applicant was not aware that the Evaluation Team wanted to ask questions of the scheduled applicant group members that did not make it to the capacity interview.

#### **Evaluation Team Rebuttal.**

The Evaluation Team Rebuttal points out that the Applicant Response agrees with many of the Recommendation Report's findings and notes that more detailed rebuttal is not necessary. The rebuttal also notes that the Applicant Response contains much new information that the Evaluation Team cannot evaluate.

In regard to the applicant's response to the academic plan concerns, the rebuttal maintains that the application did not contain a "coherent" academic plan and contends that establishing a task force is not an adequate substitute for a plan for purposes of the application.

In regard to the applicant's response to the organizational plan and financial plan concerns, the rebuttal maintains that the applicant's uncertainty of the proposed school's location and "lack of clarity and focus" about its ideal facility and intended student population made the application difficult to adequately evaluate.

In regard to the applicant's response to the capacity concerns, the rebuttal maintains that the Evaluation Team is "not confident the applicant has the knowledge and capacity to open a successful charter school at this time."

#### **Applications Committee Meeting.**

At the April 24, 2014 Applications Committee meeting, the proposed school director provided oral testimony in support of the application. The proposed school director also submitted written testimony in support of the application. The committee did not ask any questions before taking action to recommend the denial of the application.

## V. DECISION MAKING STATEMENT

### **Introduction.**

#### Scope of Commissioner Review.

Applicants were advised at the beginning of the application process that the application should be a complete and accurate depiction of their proposed plan; no new information would be accepted at later stages in the application process. Responses to Requests for Clarification and answers given during the capacity interview needed to be clarifications, not new information. This is done because if applicants are constantly making significant changes to their plan during the application process, it makes it difficult for Evaluation Teams to provide a holistic review of the applicant's overall plan. The Request for Applications states that the Commission will not consider new information in making its decision. As such, Commissioners should not consider new information that was not originally a part 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 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 overall plan is not comprehensive, and many components are undeveloped.**

The applicant acknowledges this in the Applicant Response in stating that there were "areas [of the plan] confusing from an outsider's point of view and others not fully developed." The curriculum development plan provided in the application and Applicant Response is neither descriptive nor comprehensive and does not include a plan to align the curriculum to Common Core. The Applicant Response provides a table that lists every quote from the application in which "CCSS" was mentioned; yet none of these quotations describes a plan for alignment.

In addition to the academic plan, the organizational and financial plans are also undeveloped. Instead of providing complete plans, the applicant falls back on multiple task forces to develop the plans, as illustrated in a table in the Applicant Response. The primary strategy seems to be to establish a task force for the many components of the proposal that are not yet designed, effectively making this proposal a "plan for a plan," rather than a plan to start a charter school.

### **It is difficult to consider the value of the application without a clear proposed location and target population and in the absence of quantifiable community support.**

The Applicant Response states, "Our current space needs and projected growth and the range of options and possibilities makes selecting a location/site challenging." All applicants and even some existing charter schools face this same challenge, making a well-developed plan for locating a suitable facility all the more important prior to the approval of an application. In addition, the facility location largely drives the student population to be served, which impacts many aspects of a

plan, such as enrollment, budget, and food service. The Applicant Response acknowledges this by stating, “We fully understand this reality knowing that the resulting students, family, and community needs could drive actions.”

Further, although the application claims that community engagement is an integral part of IMAG Academy’s culture, the Recommendation Report finds is no evidence of community support. The Applicant Response explains that the applicant group’s “ties to the community” is the extent of the current level of community involvement. The lack of demonstrated community support is likely directly related to the absence of a clear and comprehensive proposal for a school in a well-defined area that the relevant community could rally around. The importance of community support in starting a charter school cannot be emphasized enough, yet the applicant lacks this key element.

**The applicant fails to demonstrate the capacity to open and run a successful school.**

Related to the previous points, the overall inadequacies of the application speak to the lack of capacity of the applicant. Even acknowledging time constraints for volunteers, the fact that two of the scheduled applicant group members did not attend the capacity interview calls into question the level of commitment to something that should be taken seriously. Further, the applicant appears to misunderstand the purpose of the application process. The Applicant Response continually implies that because the Evaluation Team did not ask the appropriate questions, the applicant did not have an opportunity to explain its proposal. The applicant should have included all the information in the application, as instructed, rather than relying on questions from the Evaluation Team, which are only intended to clarify information already contained in the application. The applicant’s failure to understand the application process does not inspire confidence in the applicant’s ability to achieve the far more difficult task of opening a charter school.

**Conclusion.**

The proposal for IMAG Academy is an interesting and unique idea, but staff agrees with the Evaluation Team that the idea remains “conceptual without an implementation plan.” While the educational choices in the geographic areas where the application proposes a school may indeed be limited, there currently is no evidence of community support for such a school. Furthermore, the applicant does not appear at this point to have the capacity to open and run a successful charter school.

Staff recommends the denial of IMAG Academy’s application. The Applications Committee agrees with this recommendation.

VI. RECOMMENDATION

Motion to the Commission:

**“Moved that the Commission deny IMAG Academy 2013 charter school application.”**

Exhibit A

**Recommendation Report for IMAG Academy**





# State Public Charter School Commission 2013 Recommendation Report

Charter Application for  
**IMAG Academy**

Submitted by  
**IMAG Academy**

Evaluation Team

**Team Lead: Doug Muraoka**

**Evaluators: Nikki Trautman Baszynski**

**Ray L'Heureux**

**Leila Shar**

**Danny Vasconcellos**

## 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 2013 Request for Applications and the resulting evaluation process are rigorous, thorough, transparent, and demanding. The process is meant to ensure that charter school operators possess the capacity to implement sound strategies, practices, and methodologies. Successful applicants will clearly demonstrate high levels of expertise in the areas of education, school finance, administration, and management as well as high expectations for excellence in professional standards and student achievement.

## Evaluation Process

The Commission has worked with the National Association of Charter School Authorizers (“NACSA”) to develop the new charter school application evaluation process. NACSA provided its advice and expertise in creating standardized evaluation forms, providing evaluator training, and assisting with the assembly of the evaluation teams to help ensure that the Commission implements the national best practices, policies, and standards needed to authorize high-performing charter schools. The highlights of the process are as follows:

**Proposal Evaluation.** The evaluation teams conducted individual and group assessments of completed applications. The Commission’s Operations staff conducted a completeness check to ensure evaluation teams only reviewed complete submissions.

**Request for Clarification.** After the initial review, the evaluation teams identified any areas of the application that required clarification. Applicants had the opportunity to respond to the evaluation teams’ Request for Clarification in writing to address these issues.

**External Financial Review.** An external review by Charter School Business Management Inc. was conducted to answer several critical questions relating to the financial information submitted by applicants. Evaluation teams could consider these reviews when drafting their evaluation.

**Capacity Interview.** After reviewing each response to the Request for Clarification, the evaluation teams conducted an in-person or virtual assessment of the applicant’s capacity.

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

*The duty of the evaluation teams is to recommend approval or denial of each application based on its merits. The Commission’s Operations staff is charged with reviewing this recommendation report, the testimony at public hearings, and other information obtained during the application process in making their final recommendation to the Commission. The authority and responsibility to decide whether to approve or deny each application rests with the Commissioners.*

## Report Contents

This Recommendation Report includes the following:

### Proposal Overview

Basic information about the proposed school as presented in the application.

### Recommendation

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

### Evaluation

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

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

### Rating Characteristics

Rating	Characteristics
<b>Meets the Standard</b>	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 school expects to operate; and inspires confidence in the applicant's capacity to carry out the plan effectively.
<b>Does Not Meet the Standard</b>	The response meets the criteria in some respects but has substantial gaps, lacks detail and/or requires additional information in one or more areas.
<b>Falls Far Below the Standard</b>	The response is wholly undeveloped or significantly incomplete; demonstrates lack of preparation; or otherwise raises substantial concerns about the viability of the plan or the applicant's ability to carry it out.

# Proposal Overview

## Proposed School Name

IMAG Academy

## Applicant Name

IMAG Academy

## Mission and Vision

**Mission:** Our mission as a K-12 public charter school is to provide a small, family-like environment to prepare mindful citizens capable in excelling in college, career and life through creating a continuum of experiences where the strengths and potential of the individual and community can flourish.

**Vision:** IMAG Academies are community resources raising generations of innovative, mindful, accepting, and giving citizens grounded in their knowledge and capabilities to create and sustain successful and peace-filled communities. An Academy would provide youth the permission to dream, environment to thrive, confidence to succeed, skills to act and the expectation to create a collaborative and peace-filled society!

## Geographical Area

Waipahu complex, which spans six square miles from Leeward Community College to the entrance of Ewa

## Enrollment Summary

Grade Level	Number of Students					
	Year 1	Year 2	Year 3	Year 4	Year 5	Capacity
	2015	2016	2017	2018	2019	2020
K	60	60	60	60	60	60
1	0	60	60	60	60	60
2	0	0	60	60	60	60
3	0	0	0	75	75	75
4	75	75	75	75	75	75
5	50	75	75	75	75	75
6	50	50	75	75	75	75
7	0	50	50	75	75	75
8	0	0	50	50	75	75
9	0	0	0	50	50	75
10	0	0	0	0	50	75
11	0	0	0	0	0	75
12	0	0	0	0	0	75
<b>Totals</b>	<b>235</b>	<b>370</b>	<b>505</b>	<b>655</b>	<b>730</b>	<b>930</b>

# Executive Summary

IMAG Academy

**Recommendation**

**Deny**

## Summary Analysis

Although the IMAG Academy application presents interesting possibilities for education in the Leeward area, the application does not meet the criteria for approval because sections of the proposal are not fully developed or aligned to reflect a comprehensive plan for a viable school.

While the application offers some interesting ideas for its proposed school, many of those ideas remain conceptual without an implementation plan. The application does not contain an actual academic plan and instead details the goals of various “task force” groups to create and implement academic and curricular plans, including developing the proposed school into an International Baccalaureate school. Further, while the application contains details like board bylaws and procurement policies, there is little evidence that the applicant group has done fundamental things, like soliciting and receiving community input and support. The intended location and ideal facility for the proposed school is unclear, and the applicant interview suggested that the location could possibly be entirely different than what is stated in the application.

Lastly, there are gaps in the proposed financial plan, a clear lack of financial expertise, and limited expertise in the organizational and academic areas.

## 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 Meet the Standard in all areas.

Academic Plan

**Fall Far Below the Standard**

Financial Plan

**Fall Far Below the Standard**

Organizational Plan

**Fall Far Below the Standard**

Evidence of Capacity

**Fall Far Below the Standard**

# Academic Plan

IMAG Academy

Rating

**Fall Far Below the Standard**

## Plan Summary

IMAG Academy proposes to open a charter school in the Waipahu-Pearl City area that will serve grades K, 4, 5, and 6 at its opening. No details of the school’s academic plan were provided because the plan is still in a conceptual phase. Currently, the school intends to implement various frameworks into its academic plan, including International Baccalaureate (“IB”) (an international education program focused on creating intercultural understanding) and Conscious Discipline (a social and emotional development framework), with an added V-BASE (Value Added Business, Arts, Science, and Engineering) component. The school also envisions its academic plan co-existing with and reinforcing IMAG culture (which values innovation, mindfulness, acceptance, and giving), while also incorporating Common Core State Standards and national standards in its delivery.

## Analysis

The academic plan falls far below the standard for approval because of it fails to describe the curriculum or a plan to develop curriculum, has no plan for alignment with Common Core State Standards and plans for implementation, and coherency.

The applicant does not propose curriculum or have a plan to develop curriculum, other than to develop an application to the IB program. Because IB is not a comprehensive curriculum, the plan to apply for IB designation does not satisfy this section. The application should have included a description of what it intends to submit to the IB for its initial application. The absence of this description made it impossible for the Evaluation Team to determine exactly what was being offered in this academic plan. Also, if the school can only identify itself as an IB applicant after April of 2015, this would give the proposed school very little time to market itself, which will likely affect the proposed school’s ability to effectively recruit students. In addition, the application did not include a contingency or transitional plan should the IB application be delayed or not approved.

The applicant failed to adequately explain its responsibility to align its curriculum with Common Core standards as part of the State’s performance system. It states that it is interested in aligning its own standards with Common Core and national education standards, but does not explain how this alignment would occur or how it would ensure academic success in students and positive results for mandated statewide assessments.

Conceptually, it is difficult to understand how the applicant will incorporate all of the aforementioned programs into an academic plan. It is difficult to develop a new curriculum, which this applicant will have to do, and the Evaluation Team is apprehensive about the applicant’s capacity, competency, and whether the applicant has sufficient time to create the curriculum it describes. Further, the applicant failed to provide examples of schools that employ the proposed model and any evidence of success.

Overall, the application is missing clear explanations of how the school’s proposed academic plan (which will incorporate IB and Conscious Discipline with a V-BASE component into the IMAG culture) will translate into a developed curriculum that will meet state requirements for public education while providing an alternative educational opportunity to the regular public school system.

# Organizational Plan

IMAG Academy

Rating

**Fall Far Below the Standard**

## Plan Summary

The proposed school’s organizational plan establishes a governing board that will be relied upon to not only govern the proposed school but to also create a rewarding and engaging learning and teaching environment. No implementation plan has been proposed for facilities and operations, but a number of task forces have been assigned various tasks toward developing the plan for the proposed school and implementation of these plans. The responsibilities prescribed by these task forces will be shared among a handful of founding group members. The applicant has cited a number of possible sites for the school - Waipahu, Ewa, Pearl City, and Waikele – and has not identified any specific facilities that will accommodate its plans for expansion.

The applicant does not intend to provide transportation services and in-house food service but is seeking to contract with a certified food provider.

## Analysis

The organizational plan falls far below the standard for approval due in large part to the gaps in planning pertaining to the location and facility.

The lack of proposed facilities for the school within the application is problematic as it is an integral component in the establishment of a charter school. While finding and maintaining a facility is a systemic challenge for charter schools, the applicant’s proposed school sites did not inspire confidence with the Evaluation Team during the interview. A lack of clarity and focus on the facility makes an assessment of the proposed organizational plan difficult. The applicant listed proposed sites in Waipahu, Ewa, and Waikele, each which would result in different student populations surrounding the school. For example, the target population in the Waipahu area mentioned in the application includes 60% Free and Reduced Lunch (“FRL”) eligible students. However, if the facility was located in the Waikele area, that percentage of FRL students is 38%. The applicant did not sufficiently explain how it would serve the demographics in Ewa or Waikele should it be unable to obtain a facility in Waipahu, the preferred geographic location as stated in the application.

Another possible area of concern is food service. The absence of food service would be an issue in the Waipahu area due to the large number of FRL students. However, if the school was in the Waikele area, not providing food service would much less of a concern. Again, the uncertainty surrounding the school’s location and facility makes it very difficult to assess the proposed school’s organizational plan.

In addition, there is no evidence of community involvement and “buy-in” for the proposed school in any of these communities despite the proposed school’s assertion that “community engagement is a part of our DNA and is inherent in our IMAG and IB culture.”

# Financial Plan

IMAG Academy

Rating

**Fall Far Below the Standard**

## Plan Summary

The proposed school's financial plan looks to ensure that funds are managed in a way that will assure a high degree of asset protection. The applicant intends to follow accounting policies and procedures that comply with generally accepted accounting principles. Procurement of goods and services will be conducted by the business manager, subject to the approval of the school director and governing board. Projected revenue for Year 1 is based on a projected enrollment of 235 students; by Year 5, the applicant projects enrollment at 730 students. The applicant has identified that its immediate goal is to find a board member with financial expertise to assist with projections and financial operational processes.

## Analysis

The financial plan falls far below the standard for approval because the plan is not practicable. The applicant relies solely on grants for funding its start-up year, but was unable to provide any evidence that it had even researched any grants. The grant assumptions used to develop the application was based on a school in Los Angeles, yet the application does not address the disparity between the California and Hawaii school systems. Additionally, the applicant proposes to have a teacher/adult to student ratio of approximately 1:13, which is unlikely at current funding levels. The lack of certainty regarding proposed facility, as described in the organizational section, hampers any real cost analysis of the preliminary budgets. Moreover, it is unclear whether the budget provided is based on maximum projected enrollment, which raises issues regarding viability should enrollment not meet projections and the applicant's budget does not include a contingency plan in the event actual costs vary negatively or enrollment falls below projections.

Another pressing concern is that neither the application group nor proposed governing board possesses the financial expertise necessary for opening and running a school. The applicant explained that an additional person would be joining the applicant group's financial committee and that this will be helpful because of this person's business degree and experience as a small business owner. The applicant points to this person as evidence of financial capacity. If the applicant truly recognizes the importance of a financial expert, this role would have been filled prior to the creation and submission of a budget. Instead, current plans project that the financial person would not start until July 2015, which is when the school itself is projected to open.



# Evidence of Capacity

IMAG Academy

Rating

**Fall Far Below the Standard**

## Plan Summary

The current founding board is comprised of four members and each is assigned to at least six of seven task forces responsible for the duties associated with the planning, the opening of the school, and implementation of the organizational, financial, and academic plans.

Three members of this applicant group were present for the capacity interview - Sheila Buyukacar, Momi Akana, and Cheryl Cudiamat. Two other potential governing board members were listed in the application but were not present at the interview.

Ms. Buyukacar is the intended school leader, has a background in working with non-profits and has worked as an educational consultant for adult and youth leadership in Colorado and as a substitute teacher in the Central District area (Waipahu).

Ms. Akana is currently the executive director of a non-profit Keiki O’Ka Aina Learning Centers and has experience as a founding board member of Voyager Charter School. She will serve as a governing board member during and after the start-up period.

Ms. Cudiamat is listed as an adviser in the application, but intends to serve in a support role to Ms. Akana managing the fiscal responsibilities during the start-up period.

The Founding Board acknowledges the absence of a financial expert and has prioritized the effort in identifying and hiring someone to fill this capacity.

## Analysis

The capacity of the applicant falls far below the standard for approval. The applicant’s questionable capacity to develop and implement its proposal was evident throughout the application process. While the lead applicant and proposed school leader Ms. Buyukacar, shows drive and passion toward this endeavor, she lacks experience as a school administrator as most of her experience with education came from her employment in Colorado where she was employed as a consultant for adult and youth leadership. The extent to which she has the capability to carry out the plan for opening the proposed school and be an effective school leader is unclear.

Ms. Akana and Ms. Cudiamat were also present for the interview. While both have experience in founding and running non-profit organizations, the Evaluation Team had similar concerns about their capacity to open and run a public charter school.

The Evaluation Team was concerned about overall the applicant group’s capacity when Ms. Akana stated that while Keiki O’Ka Aina was considering being the non-profit for the school, in the interim, it would act as a pass-through agency for the proposed school’s fund raising endeavors. This proposal is problematic as it raises liability concerns for the proposed school, and possibly the State because Keiki O’Ka Aina, which is not the established non-profit organization for IMAG Academy should not be soliciting monies or collecting funds for a not-yet-approved charter school with which it is not in partnership.

In the capacity interview, Ms. Cudiamat was identified as a “key financial advisor” for the school. However, she does not have the necessary financial expertise and experience to manage the financial needs of the school. The experience she relies upon comes by way of her experience as a small business owner.

The evaluators were unable to determine the capacity of all of governing board members because a few did not show up at the capacity interview, although scheduled to appear.

The application does not provide all the information required by the Request for Applications, responses to the Request for Clarification are unclear and inadequate, and the applicant failed to assemble a team capable of answering all questions pertaining to education, organization and finance necessary for the capacity interview. The applicant’s explanation for why some of its members were absent from the interview centered on “difficulties” in managing both current job responsibilities commitments to the proposed school. The Evaluation Team understood this to mean that the absent members prioritized work projects over the capacity interview, which is a critical component of the evaluation.

## **Evaluator Biographies**

### **Doug Muraoka**

Mr. Muraoka is the Commission's Academic Performance Manager. He has extensive experience with educational data and professional development in assessment data analysis. He has several years of experience as a high school teacher and also served as an academic advisor for Hawaii Pacific University. He co-authored a publication on social studies and physical education and has been a guest speaker at numerous engagements. He holds a Master of Education, Curriculum, and Instruction from the University of Nevada Las Vegas.

### **Nikki Trautman Baszynski**

Ms. Baszynski is currently working as an attorney as the first Greif Fellow, a fellowship created to fight juvenile human trafficking. Previously she was a founding teacher at the Columbus Collegiate Academy, one of the highest-performing charter schools in Columbus, Ohio, and worked as the school's Strategic Development Coordinator. She has experience as a teacher with Teach for America and has been presented with numerous awards, both during law school and her teaching career.

### **Ray L'Heureux**

Mr. L'Heureux is currently the Assistant Superintendent of the Office of School Facilities and Support Services at the Hawaii Department of Education. He has a 30-year military career with numerous executive positions in strategic and management operations with the United States Pacific Command and Marine Corps. These positions include Special Envoy for the Commanding General Joint POW/MIA at Hickam Air Force Base, Marine Forces Pacific Chief of Staff, and Marine Helicopter Squadron One HMX-1 Commanding Officer (a position which allowed him to personally fly two United States Presidents). He holds an Executive Master of Business Administration from the University of Virginia.

### **Leila Shar**

Ms. Shar is the Commission's Financial Performance Manager. She has over 20 years of experience in financial and operations management, including holding the position of Chief Financial Officer of the Queen's Development Corporation, a subsidiary of the Queen's Health System. In addition to overseeing financial operations, she has developed strategic plans for large Hawaii corporations and managed three large physician office buildings, with responsibilities ranging from oversight of renovations to leasing. She holds a Master in Business from the University of Michigan.

### **Danny Vasconcellos**

Mr. Vasconcellos is the Commission's Organizational Performance Specialist. 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.

### **Charter School Business Management Inc. (External Financial Review)**

CSBM is a firm experienced and focused on financial and organizational consultancy for charter schools. It is based in New York and has extensive nationwide charter school experience.

**Exhibit B**

**Applicant Response for IMAG Academy**

## Executive Summary

Only upon reviewing the recommendation report did we realize the evaluation team's serious concerns of our plan and capacity to make The IMAG Academy a reality. As we reflect on how to learn from the circumstances we are in, we reviewed the report with an open mind and analyzed our application with an evaluator's point of view, as best we could. To understand the level of their frustration, we also analyzed our application against the RFA. As there were many elements within our plan, we did find areas confusing from an outsider's point of view and others not fully developed. For those areas, we apologize.

More importantly, as we re-analyzed our application against the RFA, it was truly a humbling and learning experience of some of the omissions we never realized. Upon reviewing the Recommendation Report, we have come to better understand how in some areas we did not illustrate how in-depth our knowledge and understanding of the complexity of opening up and growing a charter school. We did not assure the evaluators that our minds are in constant motion and how our decision-making incorporates thousands of angles while we mitigate risk financially, organizationally, and academically all while enhancing our obligations to our keiki, family, staff, faculty, community partners and the school organizational structure. Our application didn't show how we deeply understand when new knowledge, concerns, opportunities and better ways are uncovered, The IMAG Academy, rooted in its vision and mission, will change even if all of the right boxes aren't checked or the ideal personnel mix is not on board. As we reflected, we realized we didn't demonstrate our energy, experience and the know-how to breathe life into ideas and concepts where most would never even think possible. We hope the evaluators can accept our apologies for our omissions and unclear areas that cast such dire concerns.

With that said, we also garnered a wondering of "if only" we had known what the evaluation team was thinking through questions on The Request for Clarification (RFC) or at the interview. For example, the RFC consisted of 22 questions of which none, even with informed hindsight, had given us a hint of the major concerns regarding our lack of a specific facility or location. If only questions could have been asked about how the facility size requirements and ideal growth estimates on page 44 or certain budget items were calculated.

We now understand our unintentional omission of attachment cc outlining our ideal facility, location and growth chart contributed to our major downfall. "If only" we had known it was hindering the evaluator's ability to analyze the organizational and financial planning areas more objectively, we would have been able to share with them our spreadsheets calculating facility/classroom size and common area estimates and the resulting minimum and ideal square footage requirements for years 0 through year 9 (capacity). We could have shared how our previous experience and research with common square footage cost around the area (Aiea, Pearl City, Waipahu, and Waikēle), had informed the square footage estimate used in our financial calculations noted in the three year budget and budget narrative. We could have shared some of the variables we analyze for each possible site. In fact, we were eager to share our ideas (and show our thought process) about our site/location choices that had started to materialize. In our number one choice, we were excited about being a part of a possible revitalization of a part of Waipahu - coined "The FilCom Corner". For it exemplified our vision and IMAG values and it fit our immediate needs and gave us many options to accommodate our growth plans. For example, it included the ability to use commercial space at the Filipino Community (FilCom) Center where we could have also use their conference rooms, commercial kitchen, and technology center as we helped their troubling financial situation. Milltown Mall which sits

across the parking lots of the FilCom Center and YMCA also offers another option for growth. Hans L'Orange Park offered us open green space, and the Kiso Store property could eventually become space for green-portables similar to those built in Ewa Beach. A partnership with our neighbors, YMCA (p 45) would allow us to utilize their facility, playground and pool. We even dreamt that we could convince the Golden Coin restaurant to become a certified food service provider and use their banquet rooms as a daytime cafeteria. The crowning event was when the Cudiamats agreed to be a part of our Facility task force (p 45). Their trusted professional community ties and extensive experience with county planning review procedures, permits and inspections and renovations as a certified contractor would be extremely helpful.

Although we now realized that our application did not elaborate upon some of the areas that would have been helpful to the evaluators, we do believe that most of the team's concerns could have been addressed and possibly eliminated through questions in The Request for Clarification and Capacity Interview. In fact, as we prepared for the Capacity Interview, we actually built reference binders for the evaluation team and hoped to quickly go through the 16 pages during the scheduled opening statement hoping that the team would be able to use it as a reference for their questions. We were not allowed to present them, although in hindsight, it may have uncovered a number of the concerns they had been struggling with. We may have been able to address their misconceptions with supporting documentation, spreadsheets, financial notes and collaborative and an interactive discussion.

In addition, we reviewed the commission's capacity interview directions and we made sure we prepared to discuss any part of our plan and to focus on what was being asked rather than what we came in wanting or expecting to say or share. So we sat quietly, listened and answered very specific questions.

Maybe as a lesson learned and because the opening of a charter school can transform the lives of students, especially in the Waipahu area, this interactive type of communication could have fostered a more collaborative application process as we help each other to understand the true strengths and weaknesses of an applicant group.

In summary, the rest of this narrative is in response to the analysis of our charter school application. Although we respect the recommendation and the difficult task the evaluation team had been given, The IMAG Academy's board members would like to respond to a number of report statements that seem to suggest and illustrate misconceptions, misinterpretations and information they missed within the application. The following pages will identify in each rating area the report statements needing correction and then provide evidence, clarification or a simple response. References within the application and RFC are presented within the parenthesis.

#### Academic Plan

**Report statements:** Fails to describe the curriculum or a plan to develop curriculum. The applicant does not propose curriculum or have a plan to develop curriculum. The evaluator's are apprehensive about the applicant's capacity, competency, and if they have sufficient time to create the curriculum it describes.

**Clarification:** (atch c, p 57-59) Please find below the curriculum development plan included in our application. Outlined are some of the basic, but major activities, the POCs, and timeline critical to our curriculum decisions and an essential component, along with our task forces, of our overall implementation plan.

This recommendation report was the first time we became aware of the evaluator's concerns as the RFC questions did not request information regarding curriculum development. In

addition, this concern was also never shared at the interview where we would have been able to not only use the plan, but offer more details if there were questions regarding its inadequacy.

In regards to concerns of capacity, competency and time, the curriculum development plan and the resumes within the application of our three board members (Padua, Burghardt, & Buyukacar) directly involved in the curriculum decisions are evidence of their abilities. In addition, during non-school periods, veteran teachers were also scheduled to contribute their expertise. We do understand the complexity of our curriculum development, but we are confident that by using already established National and Common Core State Standards as the performance and content guides and our chosen established frameworks (International Baccalaureate and Conscious Discipline), we are not starting from scratch, but applying the structures necessary to be able to write lesson plans and identify V-BASE (Value-added Business, Arts, Science & Engineering) project options for our initial grades, K, 4, 5 and 6.

<b>Attachment c – Curriculum Development Plan</b>		
<b>Tim</b>	<b>POC &amp; Contributors</b>	<b>Activities</b>
Jan - Apr	Cheryl B Sheila All other Members	Give overview of the International Baccalaureate Primary Year Pgm Attend an IB course-29 Jan 2014 – School Director Visit Cheryl’s class-experience IB instructional strategies in action Visit other Oahu IB World Schools (Haha’ione, etc) Share Models/Ideas – IB, Conscious Discipline, KSA, Projects
Feb - Mar	Sheila	Define and Solidify the IMAG characteristics to be used in assessments Was the student being an IMAG during the project? Does the service/product/solution have IMAG characteristics? Define/create a rubric for project assessment Apply Knowledge, Skills, & Action (KSA) model to subject area standards - Send to Cheryl and Jennifer
May	Cheryl B Jennifer P Contributing Educators Sheila	<b>Overlay all applicable standards across all subjects/categorize by KSA</b> Incorporate IMAG process and IMAG solution assessments Incorporate IB PYP viewpoint Incorporate project assessment criteria If applicable, overlay Conscious Discipline Update with above work and add grade 6 to Program of Inquiry Determine the exit knowledge and skill criteria per grade Identify knowledge/skills to include in promotion criteria-each grade. Identify “graduation” Provide a recommendation on each grade’s requirement to be promoted to the next grade criteria
Jun- Jul	Cheryl B & Sheila Jennifer P Contributing Educators Board Members	Review available publisher written curriculum materials for applicability to the standards and assessment criteria Brainstorm possible projects to be integrated into subject areas
Aug - Dec	Cheryl B Jennifer Sheila Contributing Educators	Finalize curriculum – Write Lesson Units Knowledge, Skills, Action (KSA) Objectives/Expectations Material choices, Instructional strategies, Lesson resource kits, Assessment criteria, Assessment documents

Sept	Cheryl B Sheila	Finalize materials to buy – Get approval Put materials on order
Oct - Dec	Sheila B All members Contributing Educators	Identify possible projects/partners applicable to lessons Identify educators willing to pilot in class
Jan 2015	Cheryl B, Sheila B	Order materials
Jan – Mar	Cheryl B Jennifer P, Sheila B	Continue to write/refine Lesson Units Start to recruit teachers and teacher assistants
Mar - Apr	Sheila B Cheryl B, Jennifer Contributing Educators	Teacher recruitment – Continue to refine curriculum
May - Jul	Sheila B Cheryl B & Jennifer Contributing Educators Recruited Teachers	Teacher Professional Development – Curriculum Focused Activities IB framework, IMAG/KSA/Conscious Discipline Refine Units into applicable lesson plans in all subject areas Incorporate content (books/materials), Create exercises, Incorporate project(s), Align assessments
Jun - Aug	Sheila B	Ready Facility/Equipment/School Board Members, Recruited Teachers, Students & Families, Partners

**Report statements:** There is no plan for alignment with the Common Core State Standards (CCSS). There are no plans for implementation. The applicant failed to adequately explain its responsibility to align its curriculum with CCSS. It was interested in aligning its own standards with CCSS and national standards, but doesn't explain how this would occur or how it would ensure academic success in students and positive results for mandated statewide assessments.

**Clarification:** (p 9, 11-13, 15, 57, atch d & e - 60-62) As stated in the interview, the CCSS are foundational. To us, they are mandatory. As we reviewed our application for this response, we found the use of the CCSS on nine pages. The table below contains quotes from the application of our intentions to align our curriculum with the CCSS across all subject areas. The bolded statement in the curriculum development plan (above) also highlights “standards” requiring integration. In fact, CCSS are listed as sources within the Learning and Exit standards (p 60-62).

Our “how” we were going to align CCSS is in our curriculum development plan and the statements below. Also during the curriculum development is our focus on assessments, both our on-going and the statewide test assessments.

Page	Quoted statements from our application regarding our alignment with the CCSS
9	As we guide our teaching by the various National Standards for our diverse content offerings and the CCSS for its English Language Arts and Mathematics, the children will continue to improve on their Hawaii State assessments. Through hands-on activities and V-BASE community driven projects, students will be able to apply what they've learned in school...
11	Curricular aims and learning progressions will allow the CCSS to be a baseline to measure against as on-going formative assessments will allow not only the teacher, but the student to make learning adjustments to exceed these baselines. These progressions will help engage our students in their on-going acquisition of knowledge, mastery of skills, and resulting choices and decisions required of productive citizens of a community. These informed adjustments will only enhance our student's performance on the Smarter Balanced Assessments used within the Strive Hi system.



11	Our overall goal is to provide our students a continuum of experiences (Dewey, 1938) informed by the CCSS and National Standards and driven by our school’s mission to prepare mindful citizens...
12 & 13	Our task will be to ensure several conscious alignments of applicable standards are identified across all subjects, if possible. Upon identifying the appropriate standards for the specific grade, we will then have to apply it within each content area. For example, most if not all of the English Language Arts CCSS can also be integrated and observed in Social Studies, Math, and Science. As we take the next step from instruction to V-BASE application, identifying the applicable standards and assessment points across our hands-on exercises and class, grade level, or school wide projects will be necessary and essential to assessing a student’s knowledge, skills and action...
13	The CCSS and the national level standards for the core subject areas taught in school will identify the academic knowledge and the methods and processes of each subject. But knowledge isn’t power or helpful until it is applied to help someone’s life improve in some way. Therefore, the knowledge and skills learned in school will then be applied through the use of hands on experiences and classroom, grade level, school and community integrated V-BASE projects.
15	The Academy’s assessment goals will employ the CCSS to guide English Language Arts and Mathematics and the appropriate National Standards for other content areas.

**Report statement:** There is no coherency.

**Reply:** (p 10 - 13) If anything, the holistic school-wide practices ensures and enhances a coherent academic plan. Our academic plan encompasses not only school-wide IB and Conscious Discipline practices; it also focuses on school culture and the essential supporting school organization. Our efforts start with the student and our belief that knowledge is acquired from all experiences and through a continuum of social interactions with one’s environment and that each experience affects the next, therefore making it imperative that these opportunities are purposefully planned (p 13). The application of knowledge, skills and action is one of the essential tenets of our learning environment, teaching community, and supporting school organization.

The IB framework is comprehensive in its philosophy, organization and curriculum components which include collaborative planning, a program of inquiry and assessment and instructional strategies and approaches to creating an IMAG learning and teaching environment for both students and teachers. The Academy will also have to create and maintain the foundational organizational structures to enhance student and personnel motivation, engagement, and achievement across the entire school campus. Conscious Discipline® will be used to guide the necessary language, rituals, routines, and campus/classroom structures to enhance effective and respectful communication, conflict resolution, and relationship building (p 12).

Guided by CCSS and national standards, core knowledge areas will teach the facts and methods. To enhance a student’s use of their knowledge, skills and decision making capability and to experience the real world around them, integrated V-BASE community projects will be used to apply what they’ve learned (p10).

**Report statement:** The application should have included a description of what it intends to submit to the IB organization in April 2015

**Reply:** (p 12, 56) As part of the application, it will be essential that there is alignment between the IB framework and our vision and mission and the resulting decisions and actions within our learning environment, teaching community and the supporting school organizations. The incorporation of a vertically and horizontally integrated “plan of inquiry” that is transdisciplinary in its scope and sequence is essential, therefore, these types of activities have been shared within our curriculum development plan and application. It will also be presented in the IB application.

**Report statement:** If the school can only identify itself as an IB applicant after April 2015, this would give the school very little time to market itself which will likely affect its ability to effectively recruit students. Application did not include a contingency or transition plan should the IB application be delayed or not approved

**Clarification:** Although we have a lot more to offer than our use of the IB framework, it is our belief and intention to “share” the fact that the school believes in and uses the IB philosophy of education and its curriculum framework regardless of our status. Our use of the IB framework and our IB trained teachers is independent of our application and IB World School status.

Although we have a specific task force focused on the IB certification journey, if our application/approval is delayed or not approved, use of the IB framework would continue. Therefore we didn’t see it necessary to include a contingency or transition plan for this scenario. In addition, due to its power, the IB framework is a natural alignment and support to our vision and mission. IB is a mindset, as well as a framework that ensures a wider and more integrated way to inquire into a subject. It is a way of thinking and already a part of the school.

Organizational Plan

**Report Statement:** No implementation plan has been proposed for facilities and operations, but task forces have been assigned toward developing the plan and implementation of these plans.

**Clarification:** (p 140-147) The table below outlines the tasks forces identified with the associated POCs. In addition, we’ve added a copy of a task force below to illustrate how each may be a focused piece of the overall implementation plan. We felt by dividing the different components of an implementation plan it would help the board members and volunteer advisors be able to focus not only their expertise, but their time. These task forces and our curriculum development plan consist of written start up plans requested in the application. In addition, we’ve developed a “brain storming” list (p 136-138) that was used to inform these task forces and remind us of the many activities requiring our attention in developing a supportive school organization to ensure a thriving learning environment and collaborative teacher community.

Task Force – Table 3.4		Points of Contact
1	IB Certification Process (p140)	Cheryl B & Sheila
2	School Personnel Hiring (p141)	Cheryl B & Jennifer
3	Organizational Processes (p142)	Cheryl C & Mary
4	Documentation (p143)	Jennifer & Mary
5	Facility Readiness (p144)	Cheryl C & Sheila
6	Governing Board Capacity Building (p145-146)	Momi & Sheila
7	Finance/Grants Readiness (p147)	Momi & Sheila

<b>Start Up TASK FORCE - Finance/Grant Readiness (p 146)</b> POC: Momi Akana & Sheila Buyukacar	
Goal	Start Up Funding by Aug-Oct 2014
Duration	Until start-up funds cover costs pre-DOE funding – transfer function to Board/permanent committee
Commence	Jan 2014
Dependencies	Charter Approval
Reporting	Monthly updates to Governing Board/School Director
<b>Milestones</b>	
Jan-Feb 2014	Re-evaluate budget for any oversights

Jan 2014 - ongoing	Identify possible committee members Work closely with all task force to keep abreast of under/overestimated budget Items (especially facilities) Rework lower breakeven enrollment figures – get high figure for grant/donation goals Rework budget to minimize expenditures – get low figure for grant/donation goals
Feb 2014- ongoing	Write Federal Start-up Grant (or any other) – ready for May approval
Jun 2014	Form committee (Finding/Aligning/Writing)
Jun 2014 – ongoing	Canvas partnerships and donations Work closely with Facilities Task Force to confirm/identify equipment and furniture needs/wants and associated costs Develop budget for incremental funding/donations Identify funding and donation sources Write funding/donation request
Oct-Dec 2014	Update financial figures with task force updates if not in line with original budget
Jan-May 2015	Work with HI DOE to set up necessary information and financial systems

**Report statements:** Gaps in planning pertaining to the location & facility. The lack of proposed facilities is problematic. The proposed sites did not inspire confidence with the evaluators during the interview. A lack of clarity and focus on the facility makes an assessment of the proposed organizational plan difficult. The applicant listed proposed sites in Waipahu, Ewa, and Waikēle. Each would have different student populations. The applicant did not sufficiently explain how it would serve those students if not able to obtain a preferred Waipahu location.

**\*Clarification:** (p 5, 44, 45, atch ee - 144, Financial Plan Worksheet) As mentioned in the RFC and interview, our current space needs and projected growth and the range of options and possibilities makes selecting a location/site challenging. During this response period, we re-analyzed our application against the RFA and found we unknowingly left out attachment cc which would have described our ideal facility and growth plan.

Budget estimates had been entered into the original financial plan worksheets based on our research and information was written into the application about our needs for the 1<sup>st</sup>, 3<sup>rd</sup>, and 9<sup>th</sup> (capacity) years, but the narrative was incomplete. Although we had spreadsheets that would have been evidence of extensive planning, it was not shared within the application due to our oversight. Clarification of our estimates was not requested during the RFC or interview.

The following are the calculations of the information that had informed our budget estimates and should have been shared in attachment cc and possibly during the RFC and Capacity Interview. These calculations make up our budget submission and are essential to allow us to investigate location and facilities with a full range of possible options. We had calculated a minimum and ideal square footage estimates for each year until reaching our capacity at year 9. Approximately 6000 to 8500 square feet was needed for our initial 235 students. The minimum estimate worked with 500 sq ft per class and 1 common area of 1000 sq ft. The maximum estimate is based on 750 sq ft per class and 1 common area of 1000 sq ft. Additional classes and common areas are added as total students increased over the years.

Part of the challenge shared with the evaluators during the interview was our desire to find a location where we could grow without having to relocate. Adding to the challenge, facility decisions are not only driven by space estimates or our mission, it is highly affected by such factors as availability at the time of need, landlord desires and plans, zoning, facility configuration, lease terms, parking, traffic flow, outdoor space, adjacent buildings and businesses, costs to renovate or build out a facility/location into a safe school environment, and

even the proximity to other schools for possible partnerships in areas like playgrounds, food service and cafeteria use. These questions are very difficult to speculate, but an estimate of costs can be determined. In fact, every location has pros and cons and their associated costs in dollars (renovation, site readiness, permitting, etc), time and changing student and family demographics.

Each location results in different student populations (p 5). We thought by being transparent in sharing our options, the evaluator concerns would be discussed. Although the evaluation team never asked us about how we would serve the students in these different areas, we have always realized even a couple of blocks can shift our student demographics. We fully understand this reality knowing that the resulting students, family and community needs could drive actions that weren't considered or require a change in our original thoughts and plans.

Since this report was the first indication of something gone awry, we think the evaluators could have questioned us during the RFC or interview about our estimates within the budget and square footage figures within the narrative. We believe this would have allowed us to discuss our estimates and plans and illustrate our ability to consider the complexity, as well as the pros and cons of locations and to test our assumptions about space requirements and costs estimates.

**Report statement:** The absence of food service would be an issue in the Waipahu area due to the large number of FRL students.

**Clarification:** (p 46) We agree the absence of food service could pose a concern in Waipahu. As importantly, we know these types of decisions may have to be changed due to the needs of our students and families. Our choice to find a certified food service provider that would allow us to still offer FRL to our students was our first option. In addition, a common practice amongst DOE public schools is to partner with another school in the same complex to act as a certified food service provider allowing the FRL concern to be resolved.

**Report statement:** The uncertainty surrounding the school's location and facility makes it very difficult to assess the proposed school's organizational plan.

**\*Clarification:** Although we are completely aware how a location may change or disrupt our plans, we do believe a large portion of our organizational plans can be assessed as we've either made specific organizational decisions or created startup plans (task forces) to relook and help our decisions on governance, governing board members, policies, advisory bodies, procedures, our staff structure estimates, our personnel policies, and professional development, etc.

**Report statement:** There is no evidence of community involvement and "buy-in" for the proposed school in any of these communities despite the proposed assertion that community engagement is a "part of the DNA and is inherent in their IMAG and IB culture".

**Clarification:** (p 6, 32, 34) The community involvement at this time has been rooted by our applicant team's ties to the community (p 34) and their experience in and knowledge about the community and student needs. In addition, high student enrollment in all schools within the Waipahu complex is a frightening visual reminder of the lack of alternatives in this area (p 32).

It is necessary to clarify what is meant when we've asserted that community engagement is a part of the DNA of The IMAG Academy. Simply put, the IMAG Academy consists of a learning environment, teaching community and the supporting school organization. It is driven by its vision, mission and values and culminates with its culture. Every decision made is affected by these factors and drives its need to be family driven, student focused, and community centered. The frameworks we have chosen (International Baccalaureate and Conscious

Discipline), the resulting mindsets and behaviors with an IMAG lens will drive our decisions regarding our plan of inquiry (scope & sequence, school integration, trans-disciplinary) and our application of the knowledge and skills learned through our community V-BASE projects. Organizational policies and procedures like our advisory boards, learning and teaching strategies, weekly schedules, school wide in-class structures, rituals, routines are just a few of how we strengthen community involvement. These strategies are not left up to each teacher to implement, but The IMAG Academy is purposefully and mindfully created and developed, maintained, reflected upon to ensure engagement at all levels of community; classroom, school, local, global. The IMAG Academy and everything it does is based upon community and the school being engaged and in relationship with each other.

#### Financial Plan

**Report statement:** Applicant relies solely on grants for funding its start-up year, but was unable to provide any evidence that it had even researched any grants. The grant assumptions used to develop the application was based on a school in Los Angeles, yet the application does not address the disparity between the CA and HI school systems.

**Clarification:** (p 147-148 ) At the time of application, the grant assumption of approximately \$250K was informed by an accumulation of several sources of information over a 4-6 month time period; reading about start up grants, the information presented at the pre-RFA briefing, the fact that two of last year’s charter school grantees received \$125K from the Castle Foundation and a subsequent discussion with our mainland advisor, Dr Randy Palisoc and the information about his \$400K start up grant. Therefore, as a planning budget estimate we felt confident that grants totaling appropriately \$250K could be received.

With that said, we continued to research options and grant criteria. That’s when we found out about the restrictions on the grant that Dr Palisoc had received. At that time, we made a conscious decision to do two things. First, was to leave the \$250K grant amount as a budget line item. Second, was to analyze a variety of budget items within the initial startup period to be removed completely or to realign portions of the expense to year 1 and after HI DOE funding was received. A table in attachment gg – Budget Narrative (p 147) and an explanation was attempted. This activity of expending money after funding resulted in the grant amount needing to be approximately \$112K, well in line with what the other two charter schools received from the Castle Foundation. In addition, we also shared other local grant possibilities (Waipahu Community Foundation, Ulupuno, and the Learning Coalition) as part of an RFC answer.

**Report statement:** The applicant proposes to have a teacher/adult to student ratio of approximately 1 to 13 which is unlikely at current funding levels.

**Clarification:** (RFC and p 42, 45) As described in our RFC answer and in the application, there are two ratios possible; 1 to 10 (grades K-2) or 1 to 13 (grades 3-12). As important was the words that followed the ratios on page 42. It is copied below.

*“it is important to note that this ratio is accomplished by hiring teacher assistants for every two regular FTE HQ teacher. Although the teacher assistant is not always there, the opportunity for personalized and customized differentiated lessons can impact the teacher to student ratio”.*

Although, the staffing charts and budget items reflect this teacher assistant hiring policy correctly, it seems that the qualifying statement about teacher assistants was not taken into consideration by the evaluators; therefore in hindsight, we ***should not have used them*** as it created questions and doubt about our staff and budget estimates that we can’t seem to affect.

**Report statement:** The lack of certainty regarding proposed facility, as described in the organizational section, hampers any real cost analysis of the preliminary budgets.

**\*Clarification:** (p 44, 45, atch ee - 144, Financial Plan) Please see two separate responses in the organizational section on page 7 & 8 of this response-Two answers are marked with an asterisk.

**Report statement:** It is unclear whether the budget provided is based on maximum projected enrollment, which raises issues regarding viability should enrollment not meet projections.

**Clarification:** (pg 7, 42, 53, atch x-132-134, 147) The evaluator's plan summary in the recommendation report was correct when they highlighted that the revenue was based on enrollment projections of 235 students the first year and 730 students in year 5. These are our maximum enrollment figures for the corresponding years. In addition, the projected enrollment and revenue figures were also presented in the application (p 53). Although we had worked with several different versions of our budget to understand the effects of lower than maximum enrollment and expense reduction or elimination, the commission only allowed us to present one financial plan. We decided to present a budget that reflected the revenue and expenses at our maximum projected enrollment as described throughout the application. Upon review of the Financial Plan Workbook, the FTE entries correspond to the staffing charts (atch x) and staffing rationale and staff relationships (p 42) which also reflect a maximum enrollment projection to ensure the desired/proper staffing levels could be covered by the projected revenue.

In addition, attachment gg-Budget Narrative on page 147 presented a table with a summary of projected maximum enrollment and the associated revenue and expenses for year 0 – 3. Reviewing this table, you will see some of the expense figures varying from the budget submission, as we had worked on several different versions of our budget to understand the effects of lower than maximum enrollment and how reduction or elimination of a budget item would affect the bottom line. As important, one of the first steps within the Start-up Task Force – Finance/Grant Readiness (copy on page 7 of this response) directs a re-evaluation of the budget for any oversights and to rework lower breakeven enrollment figures as well as to minimize expenditures. It also guides the task force to constantly confirm and update financial figures from other task forces and the HI DOE information and financial systems.

**Report statement:** The applicant's budget does not include a contingency plan in the event actual costs vary negatively or enrollment falls below projections.

**Clarification:** (p 147, RFC) It was brought to our attention by the evaluators and an answer was requested during the RFC. We did submit attachment gg and had listed a number of budget estimates allowing us to identify areas that could be modified to account for costs varying negatively or enrollment falling below our projections. Unfortunately, the narrative was not submitted.

In response to the RFC, we listed 9 major areas we had discussed to increase revenue or decrease expenditures. Some of the activities had been listed within the Start Up TASK FORCE – Finance/Grant Readiness (p 147). A copy is on page 7 of this document. It is important to note that these 9 major areas would materialize in many different action strategies as well.

**Report statements:** Neither the application group nor proposed governing board possesses the financial expertise necessary for opening and running a school. The applicant group suggests an additional person [Cudiamat] with a business degree and experience as a small business owner is evidence of financial capacity. If the applicant truly recognizes the importance of a financial

expert, this role would have been filled prior to the creation and submission of a budget. Instead current plans project that the financial person would not start until July 2015, when the school is projected to open.

**Clarification:** (p 142, Financial Plan Worksheet) Although we attempted, we were unable to find a board member or advisor that held the professional title of accountant or certified public accountant before the application deadline. It is a common difficulty for new charter schools and non-profits to acquire this type of expertise on a board. As a volunteer prior to the application deadline, Ms Cudiamat's resume was not included within the application. Since then she has agreed to be a governing board member and upon reviewing her resume, her expertise in this area could be looked upon as a possible fit for the time being. We did attempt to provide her resume at the interview, but was not allowed. As we will continue the search as stated in the interview, along with Ms Cudiamat's added financial expertise and access to two other experienced business people; Ms Akana, and Ms Buyukacar, being able to work together is the next best option. With that said, a budget line item (item #132) was included as a backup contingency to contract professional services in this area and to work together with the appropriate board member in the initial startup period and each year thereafter.

#### Evidence of Capacity

**Report statement:** There are 4 board members and each is assigned to at least 6 or 7 task forces.

**Clarification:** (ref: p 33-34, 39, 45-47, 140-147) This statement is incorrect. There were four board members and two local volunteer advisors at the time of application. There are seven task forces (atch ee) and one curriculum development plan (atch c). As proof to the assignments of our board members, Table 3.4 (p 45) is included on page 6 of this document. It has been modified to easily cross reference the task force, pages in the application, and members. None of the members are assigned to 6 or 7 task forces. To ensure our transparency, Ms Buyukacar was identified as the organizational lead and has agreed to work full-time on coordinating all activities of The IMAG Academy's implementation plan (p 47). For further clarification, Ms Buyukacar has agreed to work pro bono and due to her being a retired USAF officer is able to forgo any type of compensation during this startup period.

**Report statements:** Ms Buyukacar lacks experience as a school administrator. She has a background in working with non-profits and most of her experience with education was as an educational consultant employee for adult and youth leadership in Colorado.

**Clarification:** (ref: resume – atch m – p 85-87) The evaluators are right regarding Ms Buyukacar's experience as a public school administrator. But their description of her background is rather limited.

As stated with in the introduction (p xix) of the book of *Adventures of Charter School Creators*, we believe the evaluators must be reminded that “The tasks and roles involved in creating charter schools are fundamentally different from those of a typical public school principal, requiring more entrepreneurial and tenacious leadership.” In addition, in the book, *Charter Schools in Action*, one charter school founder adds “Starting this school reminded me a lot of starting my own business.” Therefore, we would suggest other types of successful concept and program development experience may also show great depth in essential leadership and management knowledge and skills needed as a school leader.

Here is a summary of Ms Buyukacar’s experiences as an educator, curriculum and new program developer as written and highlighted in her resume within the application that should have illustrated a wider range of experience and success than the above statement suggest.

Ms Buyukacar has led a non-profit in Hawaii, The Baby Hui as the Executive Director. As the owner of her own company since 2006, she is currently working as a professional contractor with a non-profit, Hawaii Careers with Young Children, in an attempt to transform their current organizational focus, structure, processes and possibly launching an the entirely new organization . Before retiring from the USAF in 2004, she started her own IT consulting firm in Colorado from 2003-7 and was contracted for her management expertise and ability to simplify complex subjects and situations. She analyzed and implemented changes in organizational and operational processes and activities.

Ms Buyukacar’s educational career started in Colorado as she opened up Focused Reality in 2006 and created, developed, and taught a leadership program in three DOE school’s after-school programs and two summer courses at a private children’s center. With curriculum in hand, she returned home to Hawaii in 2008 and continued to manage Focused Reality.

As she continued to create, implement, and teach leadership programs she returned to the UH, Manoa to better understand the workings and research behind change curriculum for schools, the struggle of teachers and school organizations. She earned her Masters in Curriculum Studies and may return to finish her studies in Educational Administration which she has also earned 29 Master/Doctorate level credits. The table below is a summary of the work she did as an educator both in Hawaii and Colorado. Her resume highlights Ms Buyukacar’s depth of expertise and community involvement as an educator, curriculum, course, and program developer, organizational manager, and business owner.

<p><b>Sep – Dec 2010 Instructor/Program &amp; Curriculum Developer</b> Connections Program-Course in school’s after school program Wilson School, Hawaii</p>
<p><b>Oct – Dec 2009 Instructor/Program &amp; Curriculum Developer/Business Owner &amp; Manager</b> Friday Connections Program-Independently owned &amp; operated “Furlough Friday” School Kahala Elementary School, Hawaii</p>
<p><b>Aug – Sep 2008 Educational Consultant</b> School-wide implementation of Conscious Discipline American Renaissance Academy, Hawaii</p>
<p><b>Jan – Dec 2007 Instructor/Program &amp; Curriculum Developer/Business Owner &amp; Manager</b> Dream Smart Program- District 11 – after school program and Child Nursery Ctrs – summer program Colorado Springs, Colorado</p>

**Report statements:** Ms Akana has experience as a founder and running a non-profit organization. Currently the executive director of a non-profit, Keiki O’Ka Aina and has experience as a founding board member of Voyager. Team has concerns about her capacity to open and run a public charter school.

**Clarification:** (p 99-103 Atch t). Again, the statements about the level of expertise of a board member are limiting and vague. Ms Akana is the Executive Director of Keiki O’Ka Aina (KOKA) with grant funding now totaling over \$35M. She is responsible for at least 21 successful federal level grant awards and numerous others from community foundations and private funders. Ms Akana started KOKA with 30 participants and has expanded KOKA’s programs to service over 4000 participants annually at 40 diverse community sites on five



islands with an annual operating budget of approximately \$5M per year. She has extensive new project creation and has started many one-of-a-kind programs from the ground up achieving all goals and objectives on-time and under budget. She supervises a staff of 100 across all sites plus a corporate office which involve training, work flow, quality control, conflict resolution, and review/evaluation processes.

She has proven and documented capacity in opening up a thriving pre-school that deals with the same and in some cases more stringent issues across a myriad of government agencies than a public charter school. Her well-developed communication skills are demonstrated through public speaking, interaction with individuals at all levels, and the development and production of detailed written materials including grants. In addition, she has also had the exciting experience as a founding board member of one of the first public charter schools; Voyager Charter School.

**Report statements:** Ms Cudiamat is an advisor and has experience as a founder and running a non-profit organization. The experience she relies upon comes by way of her experience as a small business owner. The evaluation team has concerns about her capacity to open and run a public charter school. She is identified as a key financial advisor. However does not have the necessary financial expertise and experience to manage the financial needs of the school.

**Clarification** (ref: p 33, 45, 46): As mentioned in a previous answer on page 11 of this document, Ms Cudiamat's resume was never reviewed by the evaluators. Consequently her other experiences were not included in the evaluation team's review. Some of her credentials were included in the application and spoken of in the interview and will be focused on here. The table below on page 14, Current School Governing Board & Local Volunteer Advisors – Tables 3.3 & 3.4 outlines the main expertise Ms Cudiamat has been asked to bring to our board. During the interview we discussed her financial and operations management expertise as the Keiki Care Center's founder, CEO and Director. Like Ms Akana, Ms Cudiamat directs the entire operation of a thriving pre-school that deals with the same and in some cases more stringent regulations and licensing policies across a myriad of government agencies than a public charter school. Although not a public charter school, her capacity to open and run a school has been proven. As the team only asked her about her current business, Ms Cudiamat has also had financial responsibilities in handling a \$30M budget as an administrative officer with the City & County of Honolulu from 2003 – 2007.

**Report statements:** Unable to determine the capacity of all governing board members because a few did not show up at the capacity interview, although scheduled to appear.

**Clarification (p 33-34, 39, 47):** Although we were disappointed that not all of our board/advisory members were able to come to the interview, but as we reflected and was assured by a number of books on charter school boards, each member brings different strengths to the school board. In addition, we were also reminded by the commission that the interview was not a show of force and those participating should be able to answer any question posed by the evaluators. We believe we answered all questions asked. If the evaluators wanted to ask questions of those not present, we were not aware of it or given the chance to answer them in lieu of the others not being there.

With that said, as stated within our application, we feel each board member's resume, biography, and board member information form shows extensive experience in either new business, educational program start up, or curriculum development. The team also has graduate level academic credentials in both education and business. As important, all members have and

continue to be involved in some aspect of school management, leadership, teacher training, or curriculum development. The following charts from the application are used here to quickly summarize the level of expertise, experience and academic achievement each member has accomplished and showing a high level of capacity to succeed.

<b>Member Professional Expertise – Table 2.5</b>	
<b>Area Most Comfortable</b>	<b>Team Member</b>
School/Program Leadership Administration Governance	Akana, Ancheta, Burghardt, Buyukacar, Cudiamat
Curriculum & Instruction	Burghardt, Padua
Assessment	Ancheta, Padua
Performance Management	Akana, Padua
Parent and Community Engagement	Ancheta, Buyukacar
Organizational Development	Akana, Buyukacar, Cudiamat
New Program/Business Start Up	Akana, Buyukacar, Cudiamat

<b>Current School Governing Board &amp; Local Volunteer Advisors – Tables 3.3 &amp; 3.4</b>	
<b>Member</b>	<b>Main Expertise</b>
<b>Momi Akana</b> 1996-present Executive Director, KOKA	Non-profit school/program start up, Grant Writing, Governance Non-profit founder & mgt (18yrs) -Educational Admin (Masters)
<b>Cheryl Burghardt</b> 2011-present Educator, HI DOE	IB Program, Curriculum Development, and Assessment Primary School Educator (14yrs) Principal-Teacher (3+yrs) -Education (Masters)
<b>Jennifer Padua</b> 2011-present PreService Teacher Trng Coordinator, UH, Manoa	Project Management, Curriculum Development, and Assessment Educator (7 ), Pre- & In-Service Teacher Training (3yrs), Program Mgt (4yrs) -Education (Masters), Doctorate Candidate in Education
<b>Mary Ancheta</b> 2001-present Counselor, Waipahu High	School Administration Practices and Policies Educator (10yrs), Counselor (13yrs) -Educational Counseling (Masters)
<b>Sheila Buyukacar</b> 2006-present Executive Director, Focused Reality, LLC	School and Organizational Culture & Capacity, Processes and Policies, Project Integration, Partner and Community Engagement Gvrnt & Non-profit Mgt (22yrs), Educator/Curriculum Development (6yrs) -Curriculum (Masters), Info Mgt (Masters), Gen Admin (Masters) -Educational Admin-29 credits (Masters level courses)
<b>Cheryl Cudiamat</b> 2008-present CEO & Director, Keiki Care Centers of Hawaii, Inc	Non-profit school start up, Business Owner/Mgt, Governance, and Real Estate/Facilities Renovations, real estate codes and requirements. Financial & operations mgt (11yrs) Preschool mgt (6yrs) -Business Admin (Masters)

**Report statement:** Application does not provide all the information required by the RFA.

**Clarification:** As the statement above is not specific and within the Evidence of Capacity portion of the report, we are not sure which information the team may be referring to. We hope the consolidated information from the application presented here has been helpful in clarifying our capacity as individuals and as a team.

Upon our post-recommendation report analysis of our application, we have become aware of unintentional omissions and unclear narratives. As there were statements within the application that had triggered the evaluator’s concerns, we would have hoped to have uncovered them during the RFC and interview, therefore allowing us to share our supporting documents and

thought processes. If this comment is referring to other areas of the report we hope the rest of this response will give the team insight into our thinking and capacity. We do apologize for not organizing or using more appropriate terms in a way that helped the evaluators readily see our practicable implementation plan, our curriculum development plan, and its accompanying financial budget. We are truly sorry we weren't able to uncover the concerns prior to the recommendation to deny approval for a much need public charter school in Waipahu.

**Report statement:** Request for Clarification (RFC) responses are unclear and inadequate.

**Clarification:** As the statement above is not specific, the only question specifically covered in the interview and also in the RFC was about budget line items 160/162 (Info Mgt - Salaries) and 260/263/266 (Info Mgt Equip). We thought the confusion had been resolved.

As written in the Executive Summary, page 1, reviewing the recommendation report and the above statement, we re-analyzed all 22 questions within the RFC, searching for a possible misunderstanding on our part. We found two possibilities; an RFC question about facilities and another about staff structure. The RFC question about "potential facility sites" was to address the potential impact of selecting a site on the rail route. No other questions were asked regarding facility/locations. The RFC question about staff structure requested the proposed school's plan for funding and implementing the hiring of 68 faculty members at year 5 to maintain a 1-10 student ratio. As we took a closer look at the question and our answer, we found errors made by us and the evaluators. We believe it stemmed from the team's use of the teacher/student ratios discussed earlier. The answer on page 10 of this response pertains to this situation as well.

The second misunderstanding was on our part. We didn't realize the evaluators had extrapolated the "teaching" faculty to be 68 because we also had an estimate that came to 68 for year 5, but it was a planning estimate for *all personnel*. Therefore our answer explained in detail the makeup of the "all personnel" number of 68 vs the 68 faculty members the evaluators had calculated. As we had all of the data that supported our staff and planning estimates it would have been great to know of our misunderstanding during the interview. We may have been able to better highlight our capacity to answer the evaluator's questions and soothe their concerns.

**Report statement:** Applicant failed to assemble a team capable of answering all questions pertaining to education, organization and finance necessary for the capacity interview.

**Reply:** Only until reading the recommendation report, did the board members realized they had not answered the questions successfully. Reflecting on the interview, we were surprised at the statements made in the recommendation report because the questions asked did not illustrate the major concerns shared in the report. Therefore not giving us the chance to discuss any misinterpretations or highlight information within the application that may have been missed.

Upon review and analysis of the recommendation report and as we review our application regarding academic, organization and financial capacity, we would have suspected more in-depth questions as a part of either the RFC or the Capacity Interview. For example, within the RFC there were no questions regarding Academic Plan Capacity or Operations Capacity. There was one question within Financial Management Capacity that asked about our missing contingency plan for possible budgetary shortfalls. We were able to present a summary of our plan.

As you may suspect our disappointment, it is the incorrect statements that took us by surprise. In addition, as stated many times in this response, if only the RFC and interview questions had addressed the major concerns of the evaluators, just maybe the recommendation would have been an approval for The IMAG Academy to serve Waipahu families as a public charter school!

**Exhibit C**

**Evaluation Team Rebuttal for IMAG Academy**



# State Public Charter School Commission 2013 Evaluation Team Rebuttal to the Applicant Response

Charter Application for  
**IMAG Academy**

Submitted by  
**IMAG Academy**

Evaluation Team

**Team Lead: Doug Muraoka**

**Evaluators: Nikki Trautman Baszynski**

**Ray L'Heureux**

**Leila Shar**

**Danny Vasconcellos**

As the applicant for the proposed charter school IMAG Academy has taken the time to respond to the recommendation for denial, the Evaluation Team would like to offer these statements in response to the applicant.

Overall, the IMAG Academy application and responses have been difficult to comprehend. The Evaluation Team expected a clear and comprehensive academic plan, an organizational plan that included the intended target population, and a financial plan that supported each of those plans. This was not provided. Key planning elements were overlooked and put off until a later time, as evident through the creation of multiple task forces charged with the planning and implementation of the proposed school. In the response, after a review of their plan, the applicant acknowledges that there were areas that may have been “confusing to an outsider’s point of view.” The evaluators agree.

The applicant makes a point to ask why the Request for Clarification questions and the capacity interview did not offer an indication of the major concerns of the evaluators. The application process is not designed to offer hints to the applicant about concerns with the application. The Request for Clarification (“RFC”) process is for the Evaluation Team to seek clarifying information in the application. Typical questions in the RFC seek to clarify terms or gain greater specificity on certain elements within the application. The process is not meant to be an early indication of approval or denial. When Requests for Clarification goes out, the evaluators have not yet made a summary evaluation. To offer an applicant an idea of “what we were thinking” or listed our major concerns would undermine the application process as a whole.

The questions asked by the evaluators in the RFC process were meant to offer a clearer understanding of what was being conveyed in the application. The interviews were designed to gauge the capability of the team to implement the plan.

With that said, the evaluators wish to rebut the contentions made by the applicant regarding the evaluation of their application.

The academic section did not contain a coherent plan of creating or implementing the many elements of their academic plan. The applicant contends that a plan was offered, however, the offering of task force assignments was not an adequate substitute for the academic plan. The Request for Applications requires submission of a development plan. The Evaluation Team expected an academic plan that detailed how International Baccalaureate (“IB”), IMAG (the school’s philosophy of innovative, mindful, accepting and giving), Common Core State Standards, V-BASE (Value Added Business, Arts, Science, and Engineering), and Conscious Discipline are woven together to form the IMAG Academy curriculum.

The organizational plan concerns primarily come from the applicant’s uncertainty of where its proposed school would be located. While the application described a school that would be located in the Waipahu-Pearl City area, in the capacity interview, it was mentioned that the applicant was considering sites in Ewa and Waikēle. Also in the interview, it was clear that the applicant did not understand the importance of clearly articulating where the school would be located, the ideal facility, and the student demographic population it intends to serve. This lack of clarity and focus made it difficult to adequately assess the applicant’s budget and financial plans.

As indicated throughout their response, the applicant agreed with much of the analysis from the Evaluation Team and acknowledges that omissions were made and sections were confusing within the application, making any further rebuttal of the applicant’s response unnecessary. Throughout the

application process, the applicant has not demonstrated the ability to clearly and concisely explain its vision of its intended charter school. The Evaluation Team is not confident the applicant has the knowledge and capacity to open a successful charter school at this time.

**New information not considered by the Evaluation Team.**

Much of the applicant's response was made up of new information, which was not included in IMAG Academy's original application. Applicants had been instructed to include all relevant information in the application and that new information submitted outside of the application itself would not be considered by the Evaluation Team. As such, a great deal of information in the response was new information, and therefore, was not considered by the Evaluation Team. This included information on the square footage costs for facilities, information regarding the IB program, information regarding budget calculations, explanation of providing food service, explanation of IMAG and IB culture, explanation of financial expertise, and an explanation of the intended school leader's capacity to run a school.

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