Charter School Application Report

Alaka'i Heritage Academy

Recommendation for the Resubmitted Summer 2019 Charter Application Cycle

1

General Information

Proposed Name	Alaka'i Heritage Academy			
Proposed Mission	Through arts integration, leadership cultivation,			
	and multicultural education, Alaka'i Heritage			
	Academy ensures all students are on a path for			
	success at the college and career level.			
Proposed EMO	Academica Nevada			
Proposed Grade	Opening: Kindergarten – 6 th grade			
Configuration	Full-Scale: Kindergarten – 8 th grade			
Proposed Opening	August 2020			
Proposed Location	Zip Codes: 89120, 89014, 89074, 89122 or 89121			

Process/Key Dates for Alaka'i Heritage Academy Charter School

- New Charter Application Training
- March 15, 2019 Notice of Intent is received
- July 15, 2019 Application is received
- August 15, 2019 AB 462 Addendum is received
- October 7, 2019 Capacity Interview is conducted
- December 17, 2019 Application is denied by the Authority
- January 7, 2020 SPCSA staff met and conferred with Alaka'i Heritage Academy committee to form on the method to correct the identified deficiencies
- January 22, 2020 Resubmitted application is received by the Authority
- February 19, 2020 SPCSA staff discussed resubmission with applicant team

Planned Enrollment Chart

	2020-21	2021-22	2022-23	2023-24	2024-25	<u>2025-26</u>
<u>K</u>	100	100	100	100	100	100
<u>1</u>	50	100	100	100	100	100
<u>2</u>	50	100	100	100	100	100
<u>3</u>	50	50	100	100	100	100
<u>4</u>	25	50	100	100	100	100
<u>5</u>	25	25	50	100	100	100
<u>6</u>	30	60	60	120	120	120
<u>7</u>	0	30	60	60	120	120
<u>8</u>	0	0	30	60	60	120
<u>9</u>						
<u>10</u>						
<u>11</u>						
<u>12</u>						
<u>Total</u>	330	515	700	840	900	960

Executive Summary, Process and Recommendation

During the December 17, 2019 Authority meeting, SPCSA staff presented the findings of the initial review committee and SPCSA staff for the Alakai' Heritage Academy charter application. The initial application was found to exhibit shortcomings within all four of the components of the submitted application. The review committee and SPCSA staff found that the proposed academic, organizational and financial plans did not meet the standards as outlined in the charter application rubric. The review committee and SPCSA staff also found that the application also did not Meet the Standard within the Meeting the Need component of the application.

A second committee comprised of SPCSA staff reviewed the resubmitted Alaka'i Heritage Academy application after it was received on January 22, 2020. The review committee approached rating the resubmission with two primary concentrations:

- To determine if the applicant had corrected the original deficiencies found in the original application; and
- To verify that the applicant's resubmission did not change the rating of any component of the rubric that was determined to previously Meet Standard

Upon resubmission, the review committee determined that a few deficiencies within the original application had been addressed, and the ratings against the charter application rubric reflected these changes. Some improvements were found within the meeting the need, academic

and operations sections. In the resubmission, the applicant provided 850 letters of intent from families interested in enrolling in the school, representing a substantial increase since the original submission. Data from the applicant indicates that nearly one hundred are from the target zip codes based on the newly identified facility. The applicant has made substantial progress in building support from the local community and as a result, the meeting the need section of the application is now rated as 'Meets Standard.' In addition, the review committee has determined that the applicant now meets the geographic component of the Needs Assessment. Within the academic section, the applicant has made some modifications to the plan for supporting English Learners. In addition, the applicant has provided information regarding their proposed facility.

Despite these modifications within the resubmission, the review committee finds that the charter application has determined that the application has not 'Met the Standard' in a sufficient number of application components to be recommended for approval. The review committee finds that that a significant number of deficiencies exist within the resubmitted application. It is still not clear clarity on how the components of the academic model would coherently fit together. In addition, inconsistencies between the academic model and the operations and financial plans, such as the lack of specials teachers in the first year, raise concerns about the operational readiness of the applicant.

For these major reasons, in addition to those outlined, SPCSA staff recommends that the Authority deny the Alaka'i Heritage Academy charter school application. The proposed school does not meet or exceed the minimum financial or administrative operating standards, procedures and requirements. Sound evidence is not provided which demonstrates the effectiveness of the educational program proposed for the school.

<u>Proposed motion:</u> Deny the Alaka'i Heritage Academy charter school application as resubmitted during the 2019 Summer Application Cycle based on a finding that the applicant has failed to satisfy the requirements contained in NRS 388A.249(3).

Summary of Application Section Ratings

The State Public Charter School Authority is required to assemble a team of reviewers and conduct a thorough evaluation of the application, which includes an in-person interview with the applicant designed to elicit any necessary clarification or additional information about the proposed charter school. The SPCSA is required to adhere to its policies and practices, namely the application guidance, training and rubric, regarding evaluating charter applications. Ultimately, the SPCSA must base its determination on the documented evidence collected through the application process.

Rating options for each section are Meets the Standard; Approaches the Standard; Does not Meet the Standard. These are defined as follows:

- Meets the Standard: The response reflects a thorough understanding of key issues. It addresses the topic with specific and accurate information that shows thorough preparation; presents a clear, realistic picture of how the school expects to operate; and inspires confidence in the applicant's capacity to carry out the plan effectively in a way which will result in a 4- or 5-star school.
- **Approaches the Standard:** The response meets the criteria in many respects but lacks detail and/or requires additional information in one or more areas.
- **Does Not Meet the Standard:** The response is undeveloped or 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.

The rubric is broken into four major sections as outlined below and detailed descriptions of each rubric item can be found in the full rubric located on the SPCSA Application website: http://charterschools.nv.gov/uploadedFiles/CharterSchoolsnvgov/content/News/2019/191217-Updated-Application-Rubric.pdf

Application Section	Initial Rating	Resubmission Rating	
Meeting the Need	Approaches the Standard	Meets the Standard	
Targeted Plan	Does Not Meet Standard	Meets the Standard	
Parent and Community Involvement	Approaches the Standard	Meets the Standard	
Academic Plan	Approaches the Ctandard	Approaches the Standard	
	Approaches the Standard	Approaches the Standard	
Mission and Vision	Approaches the Standard		
Transformational Change	Approaches the Standard	Approaches the Standard	
Curriculum & Instructional Design	Approaches the Standard	Approaches the Standard	
Distance Education Requirements	N/A	N/A	
Pre-K Requirements	N/A	N/A	
High School Graduation Requirements	N/A	N/A	
Driving for Results	Approaches the Standard	Approaches the Standard	
At-Risk Students and Special Populations	Does Not Meet Standard	Approaches the Standard	
School Structure (Culture)	Approaches the Standard	Meets the Standard	
School Structure (Student Discipline)	Approaches the Standard	Approaches the Standard	
School Structure (Calendar and Schedule)	Approaches the Standard	Approaches the Standard	
A Day in the Life & Scenarios	Approaches the Standard	Approaches the Standard	
Operations Plan	Approaches the Standard	Approaches the Standard	
Leadership Team	Approaches the Standard	Approaches the Standard	
Leadership for Expansion	N/A	N/A	
Staffing	Approaches the Standard	Approaches the Standard	
Human Resources	Approaches the Standard	Approaches the Standard	
Scale Strategy	N/A	N/A	
Student Recruitment and Enrollment	Approaches the Standard	Approaches the Standard	
Board Governance	Approaches the Standard	Meets the Standard	
Incubation Year Development	Does Not Meet Standard	Approaches the Standard	
School Management Contracts	Approaches the Standard	Approaches the Standard	
Services	Approaches the Standard	Approaches the Standard	
Facilities	Approaches the Standard	Meets the Standard	
Ongoing Operations	Approaches the Standard	Approaches the Standard	
Financial Plan	Approaches the Standard	Approaches the Standard	

Meeting the Need Section

This section of the application was initially rated as 'Approached Standard.' While there was some evidence that the applicant understood the needs assessment, they had not committed to a specific target population aligned to it. While the initial plan for how the proposed school would engage with parents and families met some of the rubric criteria, the applicant had not sufficiently engaged with the proposed community. In addition, a limited number of community partnerships showed potential to directly support the needs of the target population.

Upon resubmission, previous strengths were determined to have remained in place and are detailed again below. In addition, the resubmitted application clearly identifies the target community within the vicinity of the newly proposed location for the school within space to be leased from the La Palabra Viva Church located in the 89121 zip code. Based on the Academic and Demographic Needs Assessment, this zip code has a number of 1- and 2-star schools. The applicant also indicated a significant increase in Letters of Intent from prospective families and ultimately, close to one hundred of these families reside in the target community. In addition, the applicant provided eight additional letters of support from prospective partners. The resubmitted application also directly addressed other concerns noted in the initial review, including other means for parent engagement and feedback. Ultimately, the applicant showed significant improvements within the resubmitted application and this section is now rated as 'Meets Standard'. In addition, this applicant meets the geographic component of the Academic and Demographic Needs Assessment.

Areas of Strength

- Overall the school has been active in advertising their program and provided over 600 letters of intent to enroll from parents and families with the initial application and over 850 with the resubmitted application. Upon SPCSA staff request, the applicant provided the raw data from these letters of intent which indicate that nearly 100 of the letters of intent are from the zip codes within the target community identified by the applicant.
- There were 27 letters of support submitted by a range of local organization and businesses in the initial application. The resubmitted application includes an additional eight letters of support, most of which include concrete information as to how the organization will partner with the school to meet the needs of the target population.
- The applicant provides substantial data regarding the demographics, proficiency, and star ratings of the schools in the area surrounding the proposed location.
- Applicant includes plan to incorporate parents into the life of the school, once open (e.g. parent volunteering, parent workshops, Parent Teacher Student Organization, etc.).
- When asked by staff, the committee to form confirmed that all families that had submitted letters of intent had been notified regarding the new location and that they had not received any negative responses.

Areas of Concern

- With regard to how the model meets community academic needs, while the resubmitted application includes an English Language Learner (ELL) Coordinator beginning in the first year, the applicant does not address how the EL supports and services will scale to meet the needs of the growing population of the school as it nearly triples over the course of six

years. The staffing plan shows one ELL Coordinator in year 1 when the school expects to serve 330 students and one ELL Coordinator in year 6 when the school population is expected to growth to 960. The application also references two TESOL-Endorsed classroom teachers who will support the ELL Coordinator, however, there is no mention of whether additional support teachers will be added in subsequent years. Note that this concern is found across multiple sections of the rubric as it impacts the academic, operational and financial plan.

Academic Section

This section of the application was initially rated as 'Approached Standard.' The applicant outlined an arts integration model, including research to demonstrate the positive impacts that this approach can have on student achievement. However, both in the written application and during the capacity interview, the applicant was unable to clearly describe how the long list of strategies would coherently fit together to enable faithful implementation of an arts integration model in a manner likely to result in replication of previous success in other schools. In addition, the committee to form spoke generally to the applicability of the arts integration model to all students but could not specifically speak to how this model would meet the identified local community needs. The initial application also included weaknesses in establishing and monitoring goals, meeting the needs of at-risk students, school schedule and school culture.

Upon resubmission, the applicant has made slight progress in this section. The staffing structure now includes one EL coordinator and the narrative describes the role of this coordinator and of two classroom teachers with TESOL endorsements who will provide supports. However, the applicant has not addressed how these supports and staff will scale to serve the full scale of the school with proposed enrollment near three times that of the first year. The resubmission also did not provide clarity on how the components of the proposed model would coherently fit together. This includes systems to support students with academic or behavioral challenges. Concerns also remain with regard to establishing and monitoring performance goals and the school schedule. Ultimately, this section of the application remains rated as 'Meets Standard.'

Areas of Strength

- The mission statement defines the purpose and specialized focus of the school (arts and cultural integration) to its stakeholders and the public.
- Applicant provides research as to how arts integration programs can help increase student academic achievement.
- The applicant lists the curricula they intend to use; they are widely used nationwide and respond to the state and federal standards.
- There is a clear understanding of the obligation to participate in the statewide and Authority systems of assessment and accountability and an explicit commitment to full participation in all federal, state, and Authority mandated assessments and measurements which are currently in effect or may be adopted in the future, including any updates to the Nevada School Performance Framework or the SPCSA Performance

Framework.

- Applicant demonstrates understanding of Nevada and federal laws and regulations governing services for students with disabilities.
- Applicant states that the attendance goal is a daily average of 95% or higher and outlines plan to monitor and address student progress toward this goal.

Areas of Concern

- In the initial application, the plan for serving English Learners was not fully developed. The resubmission does not adequately address staffing to support ELL students. Specifically, the resubmitted application includes one ELL Coordinator and references the role of two teachers with TESOL endorsements that will support the ELL Coordinator, which appears to be sufficient in the first year of the school where the expected enrollment is 330 students. The staffing related to supporting EL students is not scaled up to align to growing enrollment, which is expected to reach 960 students by the sixth year of the contract. Note that this concern is found across multiple sections of the rubric as it impacts the academic, operational and financial plan.
- The school model is oriented around arts integration and aims to incorporate Hawaiian culture and the cultures of the eventual student body. The applicant lists various instructional strategies that will allow the school to implement their educational plan, but it is not clear in the written application (nor is a successful implementation model cited on the footnotes) as to how these strategies will be simultaneously used together. During the capacity interview members of the committee to form provided examples of classroom activities, however it is still unclear how the curriculum, arts integration model and multicultural approach will consistently and systematically be integrated to create a cohesive learning experience. The resubmitted application did not provide sufficient clarity on the implementation of the model and ultimately the application still does not provide a clear educational strategy or provide methodology for faithful implementation.
- Several components of the academic plan lack sufficient detail as to how they will be implemented in a coherent manner. For example, the application mentions multiple systems that may be used to support students including Positive Behavioral Interventions and Supports (PBIS), a Multi-Tiered System of Support (MTSS), Response to Intervention (RtI), and a School Support Team (SST). It is not clear how each of these systems would function and how they would be used to collectively support students. Similarly, the application references Daily Collaborative Team Meetings in several places, outlining a range of activities that would occur during these meetings. However, it is not clear when these meetings will happen during the school day and how they will be structured/managed.
- The K-5 schedule includes specials and indicates that these times will be used to accommodate common prep periods for grade levels. However, the staffing plan and budget do not include any specials teachers making it unclear how teachers would be allotted planning and prep periods. Thus, the schedule does not support the implementation of the academic program and there is not alignment between student and teacher schedules.
- In the initial application one of the two overarching goals was "Demonstration of at least one (1) year of growth in Reading and Math annually with the ultimate goal of meeting

and exceeding proficiency in the core curriculum." This goal raised significant questions about how the school will support students across all performance levels. In particular, a single year's growth is insufficient for students that are below grade level. The applicant has now changed that goal to 1.5 years growth for all students, articulating that students will come to them behind. However, the applicant has not defined a reliable means to measure this goal at the end of the school year or to monitor progress to this goal. Ultimately, the measures cannot be deemed to be rigorous, valid, and reliable.

- The initial application was rated as 'Approaches Standard' in the following sections: Mission and Vision, School Structure: Discipline, A Day in the Life & Scenarios. Minimal changes were made to the aforementioned sections and thus each of these sections remain rated as 'Approaches Standard.' As an example, the means identified by the applicant to measure certain components of the mission are not objective measures. Specifically, the Board intends to measure the arts integration, leadership cultivation, and multicultural education implementation through the principal evaluation.

Operations Section

This section of the application was initially rated as 'Approached Standard.' Though the applicant has described an Arts Integration model, the majority of the proposed board and school leadership have limited experience with this educational approach. While the school leader has participated in limited professional development since the initial application was submitted and has identified future learning opportunities, this continues to represent a weakness in the proposal and represents a risk regarding successful implementation the proposed model.

In addition, the initial staffing model and budget showed limited resources and support for English Learners. While the staffing model and budget have been modified and appear to be realistic for the first year of operations, the applicant has not scaled these plans up to meet the demands of the school when it reaches full scale.

The incubation year plan within the initial application was very general. The committee to form indicated substantial reliance on Academica Nevada during the incubation year, however, they could not provide details as to Academica Nevada's responsibilities and how they would hold them accountable for completing critical incubation year milestones. The resubmission includes a proposed MOU with Academica Nevada that provides high level services to be provided, but no more detail is provided with regard to key milestones and responsible parties for the incubation year.

While this section included some modest improvements, the overall rating remains at 'Approaches Standard.'

Areas of Strength

- The dismissal procedures are fair and respect the integrity of an employee.
- There is a clear delineation of authority and working relationships between the governing body and school staff. In addition, during the capacity interview, the committee to form made it clear that the EMO is a vendor who works for and would be accountable to the school's board.

- The applicant demonstrates that the membership of the governing body will contribute education, management, and business expertise and well as extensive community experience and connections; the proposed board also has the cultural background and skillset to reflect school-specific programs. Upon resubmission, a few changes were made to the proposed board which now includes two members with backgrounds in law.
- The written application demonstrates knowledge of facility costs including, as applicable, cost of purchasing, leasing, building, or renovating an educational facility. Upon resubmission, the applicant identifies a proposed facility that meets the physical and cost requirements for the school.
- While the written application did not identify a school leader, the applicant selected a leader in advance of the capacity interview. During the interview, the committee to form outlined a detailed and standards-based process for identifying a school leader. The proposed principal has attended numerous community outreach events leading up to the resubmission of the application.

Areas of Concern

- In the initial application, the plan for serving English Learners in the initial application was not fully developed. The resubmission does not adequately address staffing to support ELL students. Specifically, the resubmitted application includes one ELL Coordinator and references the role of two teachers with TESOL endorsements that will support the ELL Coordinator, which appears to be sufficient in the first year of the school where the expected enrollment is 330 students. The staffing related to supporting EL students is not scaled up to appropriately align to growing enrollment, which is expected to reach 960 students by the sixth year of the contract. Note that this concern is found across multiple sections of the rubric as it impacts the academic, operational and financial plan.
- In the initial application, the plan for the incubation year, including funding to support activities was not clear or sufficiently detailed. The resubmission clarifies that Academica Nevada is prepared to provide a \$60,000 start-up loan to Alaka'i to cover pre-operational expenses. However, no further details regarding the incubation year plan were provided. Ultimately, the incubation year plan does not provide key planning year milestones for the and concrete actions and accountability, to ensure that the school is ready for a successful launch.
- In the initial application, details regarding the relationship and expectations that the committee to form has with Academica Nevada were not present. In particular, there was no formal agreement in place to outline the responsibilities for Academica Nevada in the incubation year. The resubmission includes a proposed MOU between Alaka'i and Academica Nevada that outlines eight areas in which Academica Nevada would provide services. However, there are no specific deliverables identified. For example, the MOU states that Academica Nevada is responsible for procurement of necessary furniture, equipment, curriculum and other materials. Neither the MOU or incubation year plan provide key planning year milestones or concrete actions and accountability.
- Among the applicant team, including the proposed principal, there is limited experience with the Arts Integration educational methodology. The proposed principal, along with interested teachers, attended a professional development workshop on arts integration in January. While this represents progress, this still poses a substantial risk with regard to

successful implementation of the model. At this time, the application does not demonstrate that the leader meets necessary qualifications and competencies to successfully launch an arts integration, multicultural education school. In addition, the application does not demonstrate that the membership of the board has the special skill set to reflect school-specific programs.

- The K-5 schedule includes specials and indicates that these times will be used to accommodate common prep periods for grade levels. However, the staffing plan and budget do not include any specials teachers making it unclear how teachers would be allotted planning and prep periods. Thus, the staffing plan is not aligned to the academic program described.
- The resubmitted application indicates that the Alaka'i Heritage Academy Committee to Form is willing to incorporate an increased weight for at-risk students in the lottery. However, no specifics or details are provided. Thus, the enrollment plan does not sufficiently address lotteries, weighted lotteries, and enrollment preferences.
- The initial application was rated as 'Approaches Standard' in the following sections: Human Resources, Services, and Ongoing Operations. Minimal changes were made to the aforementioned sections and thus each of these sections remain rated as 'Approaches Standard.'

Financial Section

This section of the application was initially rated as 'Approaches Standard.' While many aspects of the budget and financial plan were well thought out, several gaps existed in the initial budget. In particular, the application included no incubation year expenses or revenue. While the applicant spoke of applying for the CSP grant, there was very limited discussion of contingency plans. In addition, the budget did not reflect any costs associated with supporting the needs of English Learners.

Upon resubmission the applicant incorporated incubation year revenues and expenditures. In addition, the application now includes an EL coordinator, which appears to be sufficient in year 1. However, the applicant has not scaled these services and costs to meet the expected demand once enrollment triples in size. In addition, there are several key areas of the academic model, such as professional development and classroom materials, in which no expenditures are included. As a result, this section continues to rated as 'Approaches Standard.'

Areas of Strength

- There is appropriate segregation of financial duties outlined in the application which align to the organizational chart and job descriptions.
- The applicant shows a firm understanding of monthly cash flow for the school.
- The EMO has the appropriate expertise to provide accurate and timely financial information to decision-makers.

Areas of Concern

- In the initial application, the plan for serving English Learners was not fully developed.

The resubmission does not adequately address staffing to support ELL students. Specifically, the resubmitted application includes one ELL Coordinator and references the role of two teacher with TESOL endorsements that will support the ELL Coordinator, which appears to be sufficient in the first year of the school where the expected enrollment is 330 students. The staffing related to supporting EL students is not scaled up to align to growing student enrollment, which is expected to reach 960 students by the sixth year of the contract. Ultimately, this is an essential service that is not appropriately accounted for in the budget and which is funded at level that would preclude the applicant group from implementing their plan. Note that this concern is found across multiple sections of the rubric as it impacts the academic, operational and financial plan.

- School level budget priorities are inconsistent with the model. For example, the budget does not include expenditures related to professional development, staff recruitment, or textbooks during any of the years 1 through 6 of the proposed school.
- The budget does not provide for any special's teachers in the first year, making the proposed daily schedule, as well as plan for teacher prep periods unrealistic. There are also inconsistencies with regard to the actual facility costs.

Capacity Interview Summary

Based on the independent and collective review of the application, the review committee conducted a 90-minute in-person interview of the applicant to elicit any necessary clarifications or additional information about the proposed charter school and determine the ability of the applicants to establish a high-quality charter school. The capacity interview for Alaka'i Heritage Academy was conducted on Monday, October 7. All but one of the proposed members of the Committee to Form attended on behalf of the applicant. In addition, the proposed principal who was identified subsequent to the submission of the application and two representatives from Academica Nevada, the proposed Education Management Organization, attended the capacity interview. Questions during the capacity interview were developed by the team of reviewers to specifically address the details of the Alaka'i Heritage Academy application and focused primarily on four key areas:

- The ability of the applicant to meet one or more of the academic or demographic needs as outlined in the SPCSA Academic and Demographic Needs Assessment.
- The academic plan, including instructional strategies, programs, assessments, and student supports.
- Organizational and Leadership capacity including vendors, the proposed principal, board qualifications, and governance.
- The financial plan, including the proposed budget, prospective facilities, and the incubation year plan.

Information gleaned from the capacity interview was coupled with the initial review of the application to determine final ratings on the rubric. Relevant information from the capacity interview is incorporated in the findings outlined above.

Meet and Confer

Members of the Alaka'i Heritage Academy Committee to Form met with SPCSA staff to discuss the deficiencies on one occasion prior to the January 22, 2020 resubmission. The applicant team asked several questions and sought clarity about the identified deficiencies.

District Input

Per Assembly Bill 462 (2019), the SPCSA solicited input from the Clark County School District regarding this application¹. The timeline regarding this request for input is below and the response provided by the Clark County School District is attached.

- September 16, 2019 Memo sent to CCSD soliciting input.
- November 6, 2019 Presentation by CCSD staff to CCSD Board of Trustees regarding input.
- November 13, 2019 Written input provided from CCSD to SPCSA.
- January 14, 2020 Written notification from the SPCSA to CCSD regarding the potential for resubmission of this application.
- January 23, 2020 Written notification from the SPCSA to CCSD regarding timeline for possible action on the Alaka'i Heritage Academy resubmitted application.

¹ Assembly Bill 462 (2019) section 6.3, subsection 1, paragraph (d): "The proposed sponsor of a charter school shall, in reviewing an application to form a charter school...If the proposed sponsor is not the board of trustees of a school district, solicit input from the board of trustees of the school district in which the proposed charter school will be located."