

EXHIBIT A

Exhibit A

Nevada Strong's Substantive Responses to SPCSA Staff's "Areas of Concern"

#	Staff Area of Concern	Nevada Strong Response
MEETING THE NEED: "Approaches the Standard."		
1.	<i>The Committee to Form confirmed that there are identified zip codes that the school wishes to serve but indicated during the interview that a final location had not been chosen. Additionally, the applicant confirmed that no formal student recruitment has occurred to date. This raises a number of questions about the demand for the proposed school model, community support for the proposed school and the ability of the school to be fully-enrolled.</i>	<ul style="list-style-type: none"> As of the Application and Interview dates, NSA was considering two zip codes (p. 5-117). But as described in the accompanying letter, NSA strongly favored (and continues to favor) its 89119 location, and it has already made significant process in securing a facility and preparing it for school occupancy. In fact, the prospect of losing the real estate in the 89119 location is a main reason for Nevada Strong's urgency now. The additional zip code is a fall back option, and NSA should not be penalized for its prudence, given that few if any landlords will sign a binding lease before a school is approved. Upon being approved, NSA will lock up its facility immediately (p. 5-118). As we discuss in Item #2, a great deal of student recruitment has taken place. Staff acknowledges our representations that we have engaged the community, attended various activities and events, visited churches, and held town hall meetings to raise awareness about our plans, as our Application also confirmed (p. 5-106).
2.	<i>The applicant team stated during the capacity interview that they have engaged with the community by attending various activities and going to churches to raise awareness about the proposed school. The applicant team also stated that parents and families of school-aged children have completed surveys as a result of these events to date. No evidence of that support exists in the application.</i>	<ul style="list-style-type: none"> Nevada Strong is able to provide evidence of signature on petitions to enroll, intent to enroll forms, survey information, as well as on social media where the website has 333+ followers. Please see the attached Exhibits B-E for further information.
3.	<i>One of the proposed founders noted that she is aware of the needs of the community as an active volunteer at a local preschool in one of the proposed zip codes and is an active member of an advisory board as well as other organizations. However, other than naming that restorative justice practices can help students, no other examples were provided. It is not clear that the community has been an active participant</i>	<ul style="list-style-type: none"> NSA has and will continue to have community support. NSA attached a couple dozen letters of support to its Application, many people who have known Ms. Dawson Owens for decades—including letters from: <ul style="list-style-type: none"> existing Nevada charter and other schools, such as NV Prep, NV Rise, Coral Academy of Science Las Vegas, Pinecrest Academy, American Charter Development, the Principal of Glen Taylor ES;

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	<p><i>in the application process, or that community input has molded the application or proposed school model. The applicant expressed frustration that it is difficult to accomplish this pre-authorization, but limited community engagement is problematic.</i></p>	<ul style="list-style-type: none"> ➤ distinguished educational teachers, leaders, foundations, and agencies, including the Public Education Foundation, Teach for America, Education Elements, Educators Unlimited, Berklee (Music) Online, Building Hope, Alex Bybee, Colin Seale; ➤ Nevada colleges/universities, including the College of Southern Nevada (CSN), Nevada State College, and the University of Nevada-Las Vegas (UNLV); ➤ prominent local leaders and dignitaries, including Mayor Debra March, Clark County Commissioner Jim Gibson, and Nevada Senator Keith Pickard; ➤ major community organizations, including SCORE Las Vegas, the American Intelligence Foundation, the Boy Scouts of America's Las Vegas Council; ➤ CCSD teachers; and ➤ many parents of students taught by Ms. Dawson Owens. <p>• Additionally, please see the attached Exhibits B-E.</p>
ACADEMIC STANDARD: "Approaches the Standard"		
4.	<p><i>The applicant forecasts serving approximately 160 EL students beginning in year 1 and states that the school will support EL students to become proficient in reading, writing, speaking, and listening. It is not clear how the presented plan combined with limited staff will effectively do this work.</i></p>	<ul style="list-style-type: none"> • Nevada Strong embraces the opportunity to serve ELL students. It will budget all of the necessary staff to meet the ELL need. Staff is correct that NSA's Application identified one specialized ELL staff member (p. 5-96). But in the Application (p. 4-56) and at the Interview, the Board explained that that was not the school's sole ELL-trained employee. To the contrary, that is an ELL coordinator post who will monitor all ELL students. As we discussed with Staff, the school's intention is to only hire teachers with ELL training, or to provide any missing training prior to or at the start of year one (p. 4-57), so that <u>all</u> educators at NSA are ELL-certified. We explained that Nevada Strong won't have one ELL teacher, but 18 or more. We will not have "limited" ELL staffing. • Moreover, at the Interview, we laid out how much ELL expertise there is in our team (and which guarantees the school's ELL success), which is a lot. Dr. Buck has served in virtually every ELL role imaginable, from ELL teacher to specialist to trainer to administrator. And then there is the overwhelming successes of Dr. Tarim, the leader of NSA's projected EMO, who educated tens of thousands of urban

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		<p>students in Texas, earning individual and EMO honors as a result. In sum, NSA's Application and Interview conclusively established our desire, capacity, and qualified plans to serve our ELL community.</p>
5.	<p><i>The application includes nine core elements and three unique approaches—TIP, Royal Block, and STREAMS 360—within the proposed academic model. The applicant was unable to clearly articulate how all of these design elements would work together in order best serve all students, particularly those from an underperforming demographic.</i></p>	<ul style="list-style-type: none"> • Small group instruction provides the opportunity for all learners to have their individual needs met, where targeted skills can be addressed. The reading workshop approach allows for all students to develop their literacy skills at their own pace. The teacher can focus their instruction on specific needs and skills in isolation and progress monitor while providing immediate feedback. The students will participate in independent practice to ensure mastery of the targeted skill. • Our individualized Blended Learning (BL) merges classic educational techniques and technology in a student-centered, teacher-inspired classroom. The program creates an interactive, engaging, and relevant setting for learning through readings, targeted and intentional activities, and purposeful performance tasks. Also, this curriculum encourages collaboration as well as student ownership of learning through goal setting, choice, and reflection. This process will integrate students' opinions and viewpoints so they can use the informational and literary texts to prepare for college and beyond. • In Nevada Strong Royal Block, students will receive personalized support to master skills at their own pace and through the method most appropriate to their particular learning needs. There will be two-time blocks dedicated to flexible placement into intervention, enrichment, or elective courses during the Nevada Strong Block. In these blocks, teachers will utilize a variety of instructional approaches to support competency-based improvement through individualized learning plans. Teachers will use technology-based learning and assessment systems to provide one-on-one personalized learning experiences for students, create small groups and support rapid feedback cycles with real-time assessment data. • Our proposed STREAMS-360 approach will fortify students' foundational skills and prepare them for academic challenges at the high school and college levels. Researchers at Texas A&M University indicate that PBL provides contextualized and authentic experiences necessary for student scaffold learning and helps build meaningful and powerful STEM concepts supported by Language Arts, Social Studies,

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		<p>and Fine Arts. thusly, integrating interdisciplinary STREAMS-360 with PBL will; a) eliminate curriculum fragmentation; b) make learning more meaningful; c) help students bridge concepts across disciplines, d) allow appropriate development with a modified curriculum, and e) allow for curriculum flexibility so that teachers can meet the needs of our diverse learners.</p> <ul style="list-style-type: none"> * TIP, Royal Block, and STREAMS 360—within the proposed academic model will work together in order to best serve all students by providing targeted, intentional, purposeful instruction for all students, along with closing the gap with their academic skills during the Royal Block by designing the instruction to address the specific needs of each student in reading and math. The targeted intervention block will allow the students to gain access to instruction that is targeted at their individual level and address the skills they need to acquire. During this instruction, the STREAMS-360 approach is incorporated to target the whole child's academic development. PBL's, Blended Learning, small group instruction will occur during the Royal Block with specific goals for each child.
6.	<p><i>While the proposed model is identified in partnership with the Royal School System (EMO), the applicant does not provide a final curriculum or even a list of possible selections. Within the incubation year and operational execution plan, it is noted that curriculum will be developed and finalized, but it raises questions about the applicant's readiness to open given that this critical piece of the academic model has yet to be identified. Other portions of the application also appear underdeveloped and/or may not be aligned to the proposed model. Specifically, Response to Intervention descriptions are vague and general, lacking detail. Within the Day-In-The-Life scenarios, daily schedules indicate that students will recite the Texas Pledge each day, which does not have a direct tie to the model. Significant gaps exist within the academic model, and more information is needed to understand how these components can be effective.</i></p>	<p>Myview Literacy</p> <ul style="list-style-type: none"> Nevada Strong ELA curriculum for grades K-5 will deliver a balanced literacy structure to teach four fundamental literacy components: reading, writing, speaking, listening. The curriculum includes authentic texts and mini-lessons, flexible instructional strategies, and targeted differentiation. This curriculum will provide a targeted framework for teaching Reading and Writing Workshop to generate a classroom of collaborative and individualized learning for all general education, ELL and students with disabilities (SWD). Our student-centered curriculum and resources will provide an opportunity for students to take ownership of their learning. The Nevada Strong ELA curriculum objective for grades 6-12 is to develop students' skills, including the perspective of the learners, collectively and individually, along with providing 21st-century learning opportunities that encourage higher success and improve the skills needed for college and career readiness. Our individualized Blended Learning (BL) merges classic educational techniques and technology in a student-centered, teacher-inspired classroom. The program creates an interactive, engaging, and relevant setting for learning through readings, targeted and

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		<p>intentional activities, and purposeful performance tasks. Also, this curriculum encourages collaboration as well as student ownership of learning through goal setting, choice, and reflection. This process will integrate students' opinions and viewpoints so they can use the informational and literary texts to prepare for college and beyond.</p> <ul style="list-style-type: none"> Students will have access to MyOn—an addition to the classroom library—where they will be able to choose from a variety of texts on their independent reading level. They can listen to the texts being read to them, which will increase their listening skills, vocabulary development and reading fluency skills. There will be an array of instructional strategies to engage ELLs in their learning. Visuals are an essential part of an ELL's academic experience, as this provides them with an alternative explanation to support their understanding of what is presented to them. Scaffolding helps by using a student's previous background knowledge and building upon this knowledge to gain an understanding of the concept or skill. Pre-teaching vocabulary is vital to allow time for the student to process the information. Vocabulary development will help the progression of a student's reading comprehension. The student may understand social English vocabulary but have difficulty when it comes to academic English vocabulary. Graphic organizers and concept maps are effective strategies to address this skill. <p><i>Eureka Math</i></p> <ul style="list-style-type: none"> Overall, Nevada Strong's mathematics curriculum will help develop students' mathematical problem-solving skills in daily life, the real world, and in their career. To facilitate the process of ensuring that students accurately solve math problems, they will be explicitly taught how to use a problem-solving model. This problem-solving model will have students analyze the given information, create a plan or strategy, solve the problem using the chosen plan or strategy and determine if the answer is reasonable. The students will have access to a variety of resources to support their comprehension of math problems, such as real objects, manipulatives, paper and pencil and technology. Students will be taught specific strategies to increase math fluency skills and math comprehension to include mental math, estimation numeric fluency, and number sense. Another aspect of our math curriculum will be guiding students in their ability to communicate mathematical ideas. This will

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		<p>be incorporated by creating diagrams, graphs, symbols to analyze information and explain a mathematical idea using relevant vocabulary terms related to specific math concepts.</p> <ul style="list-style-type: none"> • Our math curriculum will address the needs of all learners, and the instruction will be purposefully differentiated to reach all students at their skill level. The Nevada Strong's lesson plan design will be utilized for all math lessons to ensure that students can gain an understanding of all math concepts. Visuals, charts, diagrams, and graphs will be an essential part of all lessons to provide students with multi-modality learning opportunities. The lessons will be of high interest to students, engaging in facilitating active participation, while connecting the concept being taught to real-world applications. This will lead to students having conversations about what they are learning about, being able to problem-solve through a math problem with peers and use math vocabulary in context. ELL students will be supported through class/group discussions of the math concepts and will be provided with visuals to help facilitate their understanding of the lesson. There will be a whole group, small group, and independent practice to reinforce the skills the students are working on. During small groups, the teacher will reteach, assess, provide immediately feedback to students and adjust their instruction. • The students will utilize technology to promote their comprehension of math problems, which will be individualized, progress monitored and assessed to ensure proficiency in a math skill. The math curriculum will encompass three areas in assessments: formative assessment, diagnostic assessment, and summative assessment. All of the data from these assessments will be analyzed and used to drive instruction in the classroom. <p><i>STEMSCOPE/PLTW</i></p> <ul style="list-style-type: none"> • Nevada Strong's science curriculum will be a combination of project-based learning (PBL) and 5E approach. The 5E stands for Engage, Explore, Explain, Extend and Evaluate. Starting from kindergarten, we will focus on scientific inquiry as an exploration that scholars engage with through real-world applications and hands-on activities. The 5E instructional approach creates high impact on economically disadvantaged students learning and their science assessments. The 5E model is going to give the opportunity to reach and

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		<p>address every sub-group of students through unique steps. The royal curriculum will cover all state's science learning standards, offering scientific exploration as a journey of curiosity.</p> <p><i>Studies Weekly- Social Studies</i></p> <ul style="list-style-type: none"> • Nevada Strong's social studies curriculum will provide comprehensive knowledge of home, family, self, and classroom to establish the foundation for responsible citizenship in society. Students will be able to explore state and national heritage by examining the celebration of patriotic holidays and the contributions of historical figures. In the elementary level, storytelling will be one of the unique instructional approaches that teachers will utilize to teaching history, geography, culture, and people of different places. Lives of men and women who have contributed in a significant way to the progress of humankind or have made a significant impact on world history will be discussed in the class and their actions interpreted ethically to promote character development in students. • Response to intervention (RTI) and multi-tiered systems of support (MTSS) combines assessment and intervention within a multi-level intervention system to maximize student achievement and reduce behavior problems. With MTSS/RTI, Nevada Strong will use data to identify students at risk for poor learning outcomes, monitor student progress, provide evidence-based interventions and adjust the intensity and nature of those interventions depending on a student's readiness level, and identify students with learning disabilities or other disabilities. The Nevada Strong's four essential components of the RtI model are prescreening, progress monitoring, multi-level intervention system, and data-based decision making. • Nevada Strong will have response to intervention (RtI) to address students who are not identified as special education students yet. The student support team will meet and review student needs and progress of the interventions being implemented. Interventions will be provided by the general education teacher and support staff. Parents will be involved in this process and informed of the student's strengths and areas of need. If the interventions do not respond to the student's needs, a parent may request an evaluation, with or without having the RTI process. With the consent of the parent, the student can be referred for an

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		evaluation to determine a need for eligibility and special education services.
7.	<i>The application notes that Royal School System does not have a data system. This is concerning given that the application consistently discusses the importance of data in decision-making, both at the management and governance levels.</i>	<ul style="list-style-type: none"> Members of the Royal School System strongly believe in the importance of healthy and accurate data collection and making the appropriate decision that is driven from those accurate data collections. The word “data” was mentioned in the application over 100 times (once every page). Moreover, we used various dashboard systems in other states but our intention was to select the most efficient system that complies in Nevada after charter approval.
OPERATIONS PLAN: “Does Not Meet the Standard”		
8.	<i>Multiple enrollment plans were presented within the proposal, and it was not until the capacity interview that the applicant team provided the correct enrollment numbers. Different enrollment numbers for the initial term exist in multiple places within the written application. For example, the enrollment figures within the coversheet did not match submitted budget. While the applicant stated that these were typos, and that the budget included the correct figures, the review team was troubled by the lack of consistency in an area of the application that impacts most other sections. Concrete enrollment plans are fundamental to a successful charter school application.</i>	<ul style="list-style-type: none"> Nevada Strong maintains that correct numbers were present in the Application (p. 5-107; 5-109), and we hope that we have adequately cleared up any confusion. When Staff noted a discrepancy at the Interview, NSA’s Board immediately clarified (and corrected) the situation. We apologize for that clerical error. One of the values of the Interview was and is to clarify and correct errors that may occur in hundreds of pages of written documents. We hope that a single-and immediately-fixed-mistake will not overshadow the countless hours and resources NSA has brought and will bring to the effort.
9.	<i>The Board articulated that a primary reason for choosing the Royal School Services was their ability to develop the principal’s capacity, and the time and attention they can devote to leadership development. The review committee has reservations about the on-site support the EMO can provide the proposed leader given that they are currently not located in Nevada.</i>	<ul style="list-style-type: none"> The Board has the firmest possible belief in Ms. Dawson Owens’ abilities, as Executive Director, to open a successful charter school in August of 2020. Ms. Dawson Owens’ credentials, summarized in Section C of the attached letter, are simply impeccable. The Board selected Dr. Tarim and RSS (whose credentials are equally as impressive) as the projected EMO to partner with Ms. Dawson Owens, not help her “develop” capacity which would be essential to NSA’s success but is otherwise missing. Secondly, to the extent Staff is suggesting non-Nevada EMOs are not welcome in Nevada, we respectfully—disagree. Nevada has already benefited from out-of-state EMOs, and Nevada will continue to benefit by allowing other, well-qualified EMO’s to join their ranks. It should be the SPCSA’s aim to encourage

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		<p>them to come. Third, and more specifically, RSS has promised to provide NSA with the necessary <i>onsite</i> support.</p> <ul style="list-style-type: none"> Finally, as the NSA Board stated in both its Application and (through Mayor Hafen) at the Interview, if RSS were unable to perform up to the Board's expectations, the Board would immediately terminate the RSS contract.
10.	<p><i>The [sic] was a lack of clarity and completeness with regard to the proposed role of the EMO. The applicant team explained during the interview that the draft services agreement provided in the application is about 75% complete, and it is premature to finalize the agreement at that time. However, it is incumbent on the Board to understand the key terms of its agreement and speak to how it will hold the EMO accountable.</i></p>	<ul style="list-style-type: none"> Staff was concerned that the application described a “fluid” approach to the NSA/RSS relationship; the details were not locked down. At the same time, Staff encouraged us to publish a full-scale RFP (pursuant to NRS Chapter 332) for an EMO, the result of which is that we might not partner with RSS—meaning Staff is pleased we are not locked in at all. It would be unreasonable to insist that an experienced but new charter team paired with an experienced but new(ish) EMO could or should button down every aspect of their relationship prior to authorization. Instead, our Board, whose governance, academic, and financial capacity is outstanding desired to finalize the NSA/RSS relationship over the coming weeks, very likely adopting the majority of RSS's offerings, but reserving the authority to find savings by reducing EMO services where our in-house capabilities or circumstances permit. Had the Board not adopted this tack, we assume Staff would (rightly) have criticized our plans as overly EMO-driven and -dependent. Nevada Strong's Board preferred a more reasonable middle ground. In any case, as our Board finalizes the “scope of services” in the imminent RFP, it will further define the EMO's precise form of participation, reducing that fluidity. Upon selecting an EMO, our legal counsel (who represents nearly a dozen charters) is prepared to negotiate a fair contract which fully complies with SPCSA expectations and Nevada law. As we noted during the Interview, the draft NSA/RSS contract in the Application (App. 23) was merely RSS's initial form, untouched by our counsel to reasonably reduce pre-authorization liabilities. It was, at most, 75% of the final—by intention, not by accident.
11.	<p><i>The relationships between the Principal, EMO, staff and Board are ambiguous and conflicting in multiple places within the application. For example, in one part of the application it states that the Principal reports to the EMO; in another, the</i></p>	<ul style="list-style-type: none"> Staff's statement suggests there were numerous inconsistencies, but to our recollection, only one was brought up at the Interview. Regarding that one inconsistency, as we explained at the Interview, it was the result of the Application not lining up with the unedited, draft NSA/RSS contract (addressed in Item

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	<p><i>application states that the standard protocol is for the Principal to report directly to the proposed governing board. Similar conflicting information is provided for teachers. These concerns were heightened during the capacity interview as EMO representatives took the lead in providing clarification regarding these foundational relationships. While Board stated during the interview that they are ultimately responsible for the charter contract, the relationships and accountability structures need to be further clarified.</i></p>	<p>#10 above). The Application was clear that all staff report to the Executive Director (p. 5-93). The EMO may make staffing recommendations, but the Executive Director has full authority and autonomy in those matters (p. 5-98). Moreover, the Executive Director reports to the Governing Board (p. 5-100, 6-121, Att. 19), as would the EMO (p. 5-102, 5-103, 5-112, 6-121, Att. 19). Ms. Dawson Owens and Mayor Hafen re-confirmed all of the foregoing at the Interview, with Dr. Tarim affirming his agreement with this approach.</p>
12.	<p><i>During the capacity interview, the proposed Principal noted that her role with regard to the EMO is fluid and can evolve. This reiterates many of the concerns listed above—the relationships between all parties is not developed and remains unclear. Moreover, it also raises questions about what elements of the Royal School System initially attracted the proposed Board to the school, and why those identified elements are not central foundational pieces for the school proposal.</i></p>	<ul style="list-style-type: none"> • This repeats a prior area of concern. See the response to Item #10 above.
13.	<p><i>The process for hiring and firing of staff remains unclear, due in part to the ambiguity surrounding the relationship between the EMO and proposed governing board. The draft EMO contract indicates that the EMO will make recommendations to the proposed board regarding the hiring and firing of staff but does not mention what the principal's role might be in such staffing matters. During the capacity interview, the committee to form noted that the proposed contract could be changed, but that the principal will in fact be involved in the evaluation of the academic program. The proposed reporting structure and roles and responsibilities of the parties remain far from concrete, leaving many questions unanswered.</i></p>	<ul style="list-style-type: none"> • Again, as noted in Item #11 above, the EMO contract was a first draft by RSS, never edited by NSA's legal counsel as a conscious effort not to incur additional pre-authorization expenses. That evidences NSA's financial prudence, not a lack of understanding. • Moreover, the Application reasonably and adequately described our employment practices. The EMO would make staffing "recommendations" (as the Staff's own statement to the left confirms), but the Executive Director would be responsible for all H.R. decision-making. To our knowledge, there are no unanswered questions.
14.	<p><i>The capacity interview reaffirmed that the Committee to Form understands that strong enrollment drives revenue, and</i></p>	<ul style="list-style-type: none"> • As in Item #2 above, please see Exhibit B-E.

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	<i>can prevent some financial concerns. The application does not include any Intent to Enroll letters, however. The was a missed opportunity to fully demonstrate that the school is well supported within the community and is on its way to being fully enrolled if approved.</i>	
15.	<i>ELL teacher allocation may not be sufficient when paired with the general, proposed plan for this historically underserved subgroup. During the capacity interview, the applicant confirmed that there will be only one full-time ELL instructor, but that this individual will lead professional development and help build capacity among the rest of the staff. It is not clear how the presented plan combined with limited staff will effectively do this work.</i>	<ul style="list-style-type: none"> • This repeats a prior area of concern. See the response to Item #4 above.
16.	<i>The application provides a plan for the incubation year with key personnel that are responsible for various workstreams. Additionally, there is an operational execution plan provided within the application, but no owners are listed. It is unclear how these two documents are reconciled.</i>	<ul style="list-style-type: none"> • Attachment 12 of the Application is an Operational Execution Plan, a timeline table that lists a calendar of activities for successful school start-up and ongoing operations and that has been proven to be effective in establishing strong starts and continuous operations in schools across the country. The Nevada Strong team owns this model along with the contracted EMO and will implement it in phases that lead to success, and adjust as necessary in planning table.
FINANCIAL PLAN: “Does Not Meet Standard”		
17.	<i>In both the application and during the capacity interview, the Committee to Form clarified that it had no Letters of Commitment to substantiate the \$100,000 fundraising figure included within the budget for Year 1. While the applicant team did note that they have personally invested in the school, and there is a possibility of bringing in national funders, no specifics were provided. This is concerning, especially since the applicant includes increased fundraising amounts in Years 2 – 6 of \$200,000 each year. This could lead to very large deficits if fundraising goals are not achieved.</i>	<ul style="list-style-type: none"> • Our Board tried to clarify this at the Interview, and we are happy to do further. • For year one, each individual NSA Board member has pledged to either fundraise his/her pro rata share of \$100,000, or to donate that sum outright, but in either case ensuring that the full amount flows in. Given the Board members’ long-standing ties to the community, as well as their extensive experience in fundraising, they do not anticipate falling short in any particular year. Also, co-founders Annette Dawson Owens and Dr. Tarim have agreed to pledge \$50,000 to further shore up their commitment to the success of Nevada Strong. We are confident in Dr. Tarim’s ability to bring national donor support, which will only enhance our academic program. Several third parties have also pledged in-kind donations (e.g., construction materials) and cash funds totaling \$60,000.

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		<ul style="list-style-type: none"> • Even if there were a funding shortfall, Nevada Strong has planned for that scenario. Attachment 15 to the Application discusses NSA's contingency scenarios, which include (depending on the amount of the shortfall), borrowing from reserves, reducing staff, cutting budget items (e.g., field trips, sports teams, etc.), and so forth. NSA will not run a deficit in violation of Nevada law, and NSA is operating with excess and not reliant on the fundraising.
18.	<p><i>While charter applicants may contract with any EMO or back-office service provider, the proposed fee structure for Royal School Services is substantial and concerning given that Royal School Services does not have any proven results. EMO fees that range from 12% - 15% of all gross revenue are especially high.</i></p>	<ul style="list-style-type: none"> • This is now resolved. Staff was concerned that RSS's initial proposed fee of 15% (dropping to 12% by year 6) was "especially high[er]" than the fees charged by other EMOs. As a result, with Mr. Modrcin's blessing, Dr. Tarim agreed this past week to drop it to a static 12%—and he may go below that by the time RSS submits its RFP response.
19.	<p><i>The applicant was unable to articulate the procurement process for how they chose Royal School Services. During the capacity interview, the applicant confirmed that no procurement process had been established for the school.</i></p>	<ul style="list-style-type: none"> • This is also now resolved. Staff was concerned that the Board had not considered other EMOs. As a result, the Board agreed this past week, with Mr. Modrcin's blessing, that upon being chartered, the Board will issue an RFP for EMO operators, pursuant to NRS 332.039 <i>et seq.</i>, and consider all bidders equally (RSS included). • Despite this resolution, we respectfully believe Staff's conclusion was unwarranted. In the Application (p. 5-112) and at the Interview, NSA communicated the due diligence it conducted in partnering with Dr. Tarim. Although Dr. Tarim's credentials speak for themselves, we noted how Mayor Hafen and Ms. Dawson-Owens traveled to Texas to tour his schools and meet with RSS's team. Ms. Dawson Owens is familiar with dozens of schools and systems, but given Dr. Tarim's results in Texas, it was not a difficult decision for her or the Board.
20.	<p><i>It was unclear why the applicant team would receive a \$90,000 credit for rent in Year 1 for the proposed facility. No additional information was provided, and a letter from the proposed landlord was not included to explain this figure.</i></p>	<ul style="list-style-type: none"> • The landlord is extremely supportive of the seamless launch of Nevada Strong and will work to ensure the school is successful. As seen in letters of support showing their willingness to donate, time, energy and money, the landlord is working to make the rent affordable. See attached Letters of Intent dated July 14, 2019 and most recent December 2019. The landlord is donating significant building renovations, turnkey tenant improvements.
21.	<p><i>The National School Lunch Program (NSLP) is mentioned within the narrative of the application but is not accounted for</i></p>	<ul style="list-style-type: none"> • As Dr. Tarim stated in capacity interview, and as stated in application, we will be participating in the NSLP and from prior experience believe this is a wash

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	<p><i>within the budget. The applicant stated that this was due to their assumption it would be a cost-neutral service, but this is not necessarily true as there will be start-up costs. Additionally, often times the reimbursement rate does not cover all of the administrative costs associated with implementation.</i></p>	<p>monetarily wise. Nevada Strong is operating with excess funds, however, should there be additional costs associated with implementation or reimbursement that arise and are situated to handle such expenses.</p>