



Nevada State Public Charter School Authority

Rainbow Dreams Early Learning Academy Site Evaluation and Risk Based Monitoring Report: September 30, 2025

State Public Charter School Authority

775-687-9174

3427 Goni Rd, suite 103

Carson City, Nevada 89706

702-486-8895

500 E. Warm Springs Rd, suite 116

Las Vegas, Nevada 89119

Table of Contents

Links to Resources.....	3
Part 1 – Site Evaluation Report.....	4-28
Executive Summary	5
Site Evaluation Findings: Strengths.....	6
Site Evaluation Findings: Challenges	8
Site Evaluation Findings: Recommendations	9
Site Evaluation Findings: Strong Recommendations	111
Site Evaluation Findings: Deficiencies	12
Focus Group Participation Data.....	13
Focus Group Summary: Governing Board	14
Focus Group Summary: Family Members, Parents, and Guardians.....	15
Focus Group Summary: Faculty and Staff.....	16
Focus Group Summary: School Leadership	17
Focus Group Summary: Students	18
Classroom Environment and Instruction Observation Rubric	19
Classroom Observations and Additional Comments	22
Measures of Progress from Previous Site Evaluation.....	25
Operational Compliance Checks.....	26
Part 2 – Risk Based Monitoring Report.....	27-44
Executive Summary.....	28
Risk Based Monitoring: (1) Visit Details.....	29
Risk Based Monitoring: (2) School Overview.....	30
Risk Based Monitoring: (3) Scope of Review/Methodology	31
Risk Based Monitoring: (4) Summary of Visit	32
(4.1) Area of Strength	33
(4.2) Area of Improvements/Recommendations	35
(4.3) New School Support Plan	49
Part 3 - School Response.....	43-44
Appendix A	44

Links to Site Evaluation Resources:

- [Nevada School Performance Framework \(NSPF\)](#)
- [SPCSA Academic Performance Framework Results](#)
- [SPCSA Organizational Performance Framework Results](#)
- [SPCSA Financial Performance Framework Results](#)
- [Best Practices](#)

Links to Risk Based Monitoring Resources:

- [Risk Based Monitoring Canvas](#)
- [Resource- Updated Policy Checklist: FY2025-2026 Policy and Procedure Checklist Fillable](#)
- [Grants Administration Canvas](#)
- [SPCSA Risk Based Monitoring Training Modules](#)

Part 1

Rainbow Dreams Early Learning Academy Site Evaluation Report

Executive Summary

This Site Evaluation Report offers an analysis of evidence collected during the school evaluation. Pursuant to [NRS 388A.223](#), the State Public Charter School Authority (SPCSA) conducts a comprehensive review of evidence related to all charters within the portfolio during the first, third, and fifth years of operation. This comprehensive analysis addresses the school's academic and organizational effectiveness.

An analysis of the school's academic and operational success is undertaken by reviewing the most current versions of the Nevada State Performance Framework (NSPF), the SPCSA Academic Performance Framework, and the SPCSA Organizational Performance Framework.

In addition, the Site Evaluation Team conducts classroom observations to assess both the classroom environment and the instructional techniques on the day of the evaluation. The purpose of these observations is to collect evidence using a rubric based on the [Charlotte Danielson Framework for Teaching](#). All classroom rating outcomes are displayed within this report. The overall numbers provide information about the general nature of instruction at a given school during the day of the site evaluation.

SPCSA staff conducts focus group interviews by speaking with school leaders, governing board members, family members, those employed as staff, and most importantly, students enrolled at the school. The information gained during these focus groups is summarized and included in this report.

The site evaluation is designed to focus on teaching and learning (e.g. curriculum, instruction, assessment, and services for at-risk students) as well as leadership, organizational capacity, and board oversight. The SPCSA uses the established criteria to provide schools with a consistent set of expectations during each year of their charter. Final Site Evaluation Reports are published to the SPCSA website and used in conjunction with other performance information to determine renewal decisions.

Site Evaluation Findings: Strengths

A summary of strengths as observed through academic achievement indicators, classroom observations, focus group feedback, and portions of the Organizational Performance Framework.

The school's mission and vision of serving an underserved community

The school's mission and vision are closely aligned with the needs of its surrounding community, including those of the local zip code (89106), the Historic Westside¹, and the SPCSA's priorities of promoting diversity and supporting schools in areas of geographic need. Rainbow Dreams Early Learning Academy's commitment to diversity, equity, and inclusion served as a core strength. The leadership team, the board, and the family focus group emphasized that the school's primary mission is to uplift and empower "at-risk" and "underserved" students in their local community by removing barriers to academic equity. The leadership team noted that the school celebrates cultural diversity, promotes inclusive practices, and ensures equitable access to resources and opportunities for all students.

Strong family and community partnerships

Family and community partnerships are a strength of Rainbow Dreams Early Learning Academy. The school actively fosters family engagement, encouraging meaningful participation in students' education. Family focus group members shared positive experiences and a strong sense of involvement. The leadership team collaborates with community organizations, including Nevada Partners², local businesses, and faith-based groups, to remove barriers and expand enrichment opportunities for its stakeholders. The school is also committed to providing students with a morning and after-school program, food, uniforms, classroom materials, backpacks with at-home supplies, wrap-around services, and technology lending, all at no cost to families.

Ownership of the facility since 2006

A strength of Rainbow Dreams Academy Charter School is its facility ownership on the historic West Side of Las Vegas, located across from the West Las Vegas Library and Arts Center. The school's website highlights a 16,887 square-foot, state-of-the-art building, landscaped grounds, and an adjacent parking lot for staff and visitors. The main building houses fifteen classrooms, most of which are equipped with interactive smartboard technology for enhanced learning. The facility also boasts a state-of-the-art multi-media library, a large multi-purpose room, a full-service kitchen, medical quarters, and the school's administrative offices. In addition, the campus features an outdoor playground, a unique learning garden, and a science atrium. Board and leadership focus group members emphasized that ownership brings stability and avoids rising rental or lease costs, which gives them a high sense of stability.

¹ The Historic Westside of Las Vegas is a neighborhood that has played a significant role in the city's history, particularly in the context of racial integration and community development.

² Since 1992, Nevada Partners Inc. has been at the forefront of developing and deploying effective solutions to challenging and often systemic issues that hinder building a healthy, thriving, sustainable, and progressive community.

Proactive mindset to support students' social and emotional learning needs

Rainbow Dreams Early Learning Academy demonstrates a proactive commitment to supporting students' social and emotional learning needs. The leadership team and faculty focus groups emphasized the school's systems for addressing the social and emotional well-being of all students, including specialized trauma-informed³ trainings led by the school psychologist and the emotional health team. Family focus group members highlighted the staff's dedication to fostering students' self-regulation⁴ and social-emotional development, while board and faculty focus group participants valued the emphasis on building students' self-confidence. This collective commitment appears to create a nurturing school environment where students' holistic development is prioritized, serving as a strength.

³ Trauma-informed approaches do not involve trying to distinguish "symptoms" from the impact of trauma – they recognize that "symptoms" are often responses to trauma.

⁴ Self-regulation is the ability to manage your emotions and actions to achieve your goals. It is essential for physical, social, emotional, and mental well-being.

Site Evaluation Findings: Challenges

A summary of challenges as observed through academic achievement indicators, classroom observations, focus group feedback, and portions of the Organizational Performance Framework.

Student learning gaps

Addressing developmental and academic learning gaps and providing effective interventions is a challenge at Rainbow Dreams Early Learning Academy. Many students enroll below developmental expectations, requiring targeted support in literacy and math to help close achievement gaps and promote academic growth. The faculty focus group highlighted their committed efforts to support student development in all areas to close developmental or achievement gaps.

Staff recruitment and retention

Staff recruitment and retention are a challenge for Rainbow Dream Early Learning Academy. During the leadership and board focus groups, school leaders noted that attracting and retaining highly qualified teachers and support staff, due to competition with larger school districts offering higher salaries and benefits, was a significant challenge for them. The leadership team noted the importance of ongoing professional development to enhance the current staff's skills and ensure quality instruction.

Funding challenges

One of the primary challenges for Rainbow Dreams Early Learning Academy is resource limitations, particularly in funding. As a smaller charter school, the leadership team noted that both budget and staffing are more restricted compared to larger districts. These constraints make it difficult to expand programs or provide specialized services on the same scale. Additionally, recruiting and retaining highly qualified teachers and support staff present an ongoing challenge, as the school competes with larger districts that can offer higher salaries and more comprehensive benefits. These limitations hinder the school's ability to compete with other schools and agencies.

Chronic Absenteeism

Chronic absenteeism⁵ is a challenge for Rainbow Dreams Early Learning Academy. According to the 2024-25 Nevada School Performance Framework⁶ (NSPF) data, the school had a chronic absenteeism rate of 20 percent, which was a decrease from the previous year's rate of 26 percent. Despite the decreasing rates, the challenge remains and is a focus area for the school community to decrease the rate to below ten percent.

⁵ Chronic absenteeism is defined as students missing 10% or more days of school.

⁶ NSPF is Nevada's public school rating system, designed by Nevadans and developed in accordance with the federal Every Student Succeeds Act (ESSA), as per NRS 385A.600. It classifies schools within a five-star performance rating system.

Site Evaluation Findings: Recommendations

Recommended items are provided so charter schools may increase their school-wide performance and overall success. The Site Evaluation Team will follow up on these recommendations in preparation for the subsequent site evaluation.

Strengthening the overall understanding of the Nevada State Public Charter School Authority Governance Standards and Performance Frameworks

The transition from Clark County School District to sponsorship by the Nevada State Public Charter School Authority (SPCSA) presents Rainbow Dreams Early Learning Academy with a valuable opportunity to align closely with statewide requirements and standards. It is recommended that the school's board and leadership team deepen their understanding of the SPCSA's Governance Standards, as well as the Academic, Financial, and Organizational Performance Frameworks. The [Governance Standards](#), developed in accordance with Section 3 of Assembly Bill 419 from the 81st Session of the Nevada Legislature, outline the characteristics of strong charter school governance. Additional information, including the full [Performance Frameworks](#), can be accessed on the SPCSA website. Referencing these frameworks can help ensure high compliance with required Epicenter tasks, as well as state and federal policies.

Participation in SPCSA trainings

It is recommended that leadership at Rainbow Dreams Early Learning Academy actively participate in monthly professional development sessions, including those focused on Canvas⁷, technology tools, and other instructional supports. Additionally, staff should regularly review asynchronous training modules available on Canvas to reinforce their learning and stay updated on key systems and practices. Lastly, referencing the weekly SPCSA update can ensure that the leadership team remains current with important information, including available grants and training opportunities.

Continue to focus on addressing student learning gaps

The SPCSA staff recommends that Rainbow Dreams Early Learning Academy continue its effort to address student academic gaps and intervention needs in literacy and math. A focus on closing achievement gaps can significantly support the academic growth and development of their young learners. The use of student achievement data and formative and summative assessments is essential to providing individualized and targeted instruction to support the needs of all learners. Additionally, regularly monitoring the individual progress of students and making necessary adjustments to ensure that interventions are effective is essential for the academic growth of all students. Rainbow Dreams Early Learning Academy school leaders and staff may find referencing the Nevada Pre-Kindergarten Standards ([Pre-Kindergarten Standards](#)) and Kindergarten Standards ([Kindergarten Standards](#)) helpful. The Pre-Kindergarten Standards, revised in 2023, provide a framework that guides early childhood educators on the developmental milestones children should achieve by the end of their pre-kindergarten

⁷ Canvas is a robust, web-based learning management system that enables educational institutions to manage digital learning environments effectively. It provides educators with powerful tools to create and deliver engaging online course materials while allowing students to participate actively in their learning journey.

year. Supportive practices are included to help practitioners implement them in the learning environment.

Continue efforts to decrease chronic absenteeism

The SPCSA staff recommends that Rainbow Dreams Early Learning Academy School improve chronic absenteeism in PreK and Kindergarten. The school's leadership team may find helpful resources on the Nevada Department of Education website ([Chronic Absenteeism](#)) or the SPCSA Canvas Repository best practices (<https://spsca.instructure.com/courses/72>). A continued decrease in the chronic absenteeism rate can improve students' access to instruction, positively impacting academic achievement and engagement rates.

Build the capacity of the staff

The SPCSA recommends that Rainbow Dreams Early Learning Academy consider focusing on building the school's staff capacity by adding roles that address instructional quality and school growth needs that align with their budgetary resources. The school's leadership team and board may find it helpful to add a curricular specialist to support teacher development, which can enhance lesson structure, diversify student engagement opportunities, improve instructional effectiveness, and ensure curriculum alignment. Additionally, the curricular expert could serve in a dual role as an assistant administrator to help with leadership responsibilities, streamline communication, and provide operational support. Building capacity in this area can support the school's short and long-term goals.

Bolster professional development plan

The SPCSA recommends that Rainbow Dreams Early Learning Academy bolster its professional development plan to enhance the overall quality of instruction for its students. Enhancing the school's professional development plan can support the school's objectives of improving student outcomes and better prepare the staff for the possibility of adding more primary grade levels. The following resources may be considered as potential supports: accessing the Southern Nevada Regional Professional Development Program⁸ ([RPDP](#)), utilizing the resources created by Kathy Richardson⁹, and implementing Kagan¹⁰ strategies, as developed by Dr. Spencer Kagan.

⁸ The Southern Nevada Regional Professional Development Program (RPDP) offers professional development focused on content, teaching methods, student performance, and instructional strategies to enhance student achievement.

⁹ Kathy Richardson, one of the nation's leading educators of elementary mathematics, is the author and developer of the Assessing Math Concepts series.

¹⁰ The Kagan model defines over 150 repeatable, step-by-step, content-free ways to structure the interaction of students with each other, the curriculum, and the teacher.

Site Evaluation Findings: Strong Recommendations

Strong recommendations identified during this site evaluation are listed here, if applicable.

No strong recommendations were identified during this site evaluation.

Site Evaluation Findings: Deficiencies

Deficiencies identified during this site evaluation are listed here, if applicable.

No deficiencies were identified during this site evaluation.

Focus Group Participation Data

Focus groups are conducted on the day of the site evaluation and last for 45 minutes. During an abbreviated site evaluation, focus groups are not conducted.

Name of Focus Group	Number of Participants
Governing Board ¹¹	2
Family Members, Parents, and Guardians	12
Faculty and Staff	9
School Leadership	2
Students	16

¹¹ Quorum was not met, and Open Meeting Law was not violated.

Focus Group Summary: Governing Board

Two of the nine board members participated in the focus group, noting that the board's strength lies in its understanding of the community and the school's history. A member highlighted the importance of community knowledge from his service since 2006 and reflected on changes from the school's former kindergarten to eighth-grade structure. These insights help the board stay connected with the Historic Westside. Members also saw facility ownership as a source of stability, reducing concerns about rising rental or lease costs.

After discussing strengths, members outlined key challenges, including the difficulty of retaining and recruiting quality staff due to competition with district salaries and benefits. One member stressed the value of the school's unique community. The board also discussed the oversight transition to the State Public Charter School Authority (SPCSA), noting that the executive director leads this process while keeping the board informed. Compliance, financial stability, and the plan to add grade levels were highlighted as board priorities.

Turning to matters of accountability, the evaluation of the school leader was also discussed, and the members shared that evaluations are conducted annually, using a standardized document that focuses on the leader's ability to manage the budget, school policies, and procedures. The board analyzes the school leader's progress and provides feedback. In terms of the board's own self-evaluation, which also takes place yearly and concludes with a team bonding meeting, the board reflects on "what it would like to see happen at the school". Also, points of discussion include marketing and promotion of the school.

Shifting to school culture and relationships, a member noted the importance of staff who value and care for students and communicate with families. Another member added, "The leader cares for the kids and the community she serves, is open to communication, and addresses issues promptly." Furthermore, the members added that the staff demonstrates a hands-on approach in helping its students and families, which serves as an asset as students develop their potential academically and socially.

Focus Group Summary: Family Members, Parents, and Guardians

Twelve family members participated in the family focus group session. Prompted to share the school's strengths, participants underscored their appreciation for the school leader and the dedicated, caring staff. One member, reflecting on her child's growth, attributed his success to the staff's supportive mindset: "They challenge the kids, everything is structured, and they care." Another participant observed that her daughter enjoys both learning and attending school. Other members echoed similar thoughts, emphasizing the school's strong partnerships and relationships with families. This collective support helped reinforce the valued sense of community among participants.

The group expressed their appreciation for the school's focus on supporting their children's social and emotional needs. A few members discussed their child's progress, with one member sharing her son's journey, stating, "He has gone through trauma in his life. Here, they take him in as if he were his own." Another participant mentioned adopting the school's behavior management system, sharing, "We've adopted the green and red choices at home," citing the effectiveness of the behavioral support system the school has instilled. The group agreed that these approaches have had a positive impact on their families.

A segment of the discussion focused on what their children were learning, and answers included developing pre-writing skills, vocabulary, shapes, colors, technology, creative arts, physical development, gross and fine motor skills, as well as self-regulation. One participant shared her child's current classroom experience, stating, "What I like about it is that the teachers engage the students. My daughter uses a tablet and is working on writing her name, as well as developing her writing and spelling skills. She loves learning. There are small class sizes. It's very individualized." The discussion also highlighted the staff's timely communication regarding their child's progress, which was facilitated through ClassDojo¹². All members expressed their appreciation for high levels of communication and noted that this openness helps them feel connected and informed about their child's education.

The group was asked to share challenges that interfere with their child's learning. A family member noted their child sometimes having mood challenges, which led to a negative attitude. Another cited difficulty is with fine motor skills. Lastly, one member stated that their child's fatigue can negatively impact learning.

As the session concluded, the members were requested to share possible recommendations with the school leaders, and responses included adding more grade levels, retaining quality teachers, providing more tablets/devices, and increasing funding to maintain programs.

¹² ClassDojo is an online classroom management platform where teachers can record and track student behavior, facilitate classroom activities, curate student portfolios, and engage in school-to-home communication in over 35 languages through photos, videos, and direct messaging, all of which can be sent directly to parents and students.

Focus Group Summary: Faculty and Staff

The faculty focus group, comprised of nine staff members from Rainbow Dreams Early Learning Academy, highlighted teamwork, collaboration, and dedication as key strengths that support student success and family engagement. Staff stressed the value of collaboration and family involvement, appreciating the support from families. The school's commitment to free care, uniforms, meals, snacks, and community engagement was noted as another strength. Some members described the early education model as a unique community asset.

To plan and deliver standards-based instruction, the group utilizes systems such as backward planning in professional learning communities¹³ (PLCs) and the school's curricular resources, including Wonders¹⁴, 95-Phonics Core Program¹⁵, and Heggerty¹⁶, for English language arts, and enVisions¹⁷ for mathematics. Staff addressed students' social-emotional needs, stressing their importance for well-being and development. Classrooms focus on teaching students to cooperate, self-regulate, express feelings, and solve problems. Trauma-informed training from the psychologist and mental health team supports students. One member noted, "No day is the same, and sometimes behavior needs to be addressed via teachable moments." Another added, "They have short attention spans and need brain breaks." Role-play activities reinforce learning. Members noted that many strategies were gained through professional development.

When asked about challenges, the group cited supporting students with developmental delays and learning gaps as a key concern. Staff spend a significant amount of time planning differentiated lessons for diverse learners. To address learning gaps, members form small intervention groups tailored to individual needs. The group emphasized "leveling up" students' skills to foster a growth mindset. Chronic absenteeism is an obstacle that complicates efforts to address developmental delays and promote academic progress.

The group valued the school's mission, vision, and the leaders' commitment to providing comprehensive, free services, including care, food, uniforms, materials, technology lending, and family support. Several noted the importance of these services in meeting families' basic needs.

¹³ Professional learning communities (PLCs) are teams of educators who share ideas to enhance their teaching practices and create a learning environment where all students can reach their full potential.

¹⁴ Wonders is a K-6 literacy curriculum designed with a wealth of research-based print and digital resources for building a strong literacy foundation.

¹⁵ 95 Phonics Core Program is a teacher-directed, systematic, and explicit phonics curriculum from 95 Percent Group for Kindergarten through 5th grade.

¹⁶ Heggerty provides research-backed phonemic awareness and literacy programs to help students become confident readers.

¹⁷ Envision Math (now known as enVision Mathematics) is a comprehensive math curriculum for grades K-12 developed by Savvas Learning, which focuses on deep conceptual understanding through problem-based and visual learning.

Focus Group Summary: School Leadership

Two leaders from Rainbow Dreams Early Learning Academy shared their reflections and insights in the leadership focus group. One expressed gratitude for the transition to SPCSA, calling the process “enlightening” and highlighting the school's aim to serve as a positive example for the community and students: “We want to be the shining star, for our community and for our students.”

Leaders discussed the challenges of serving underserved Westside students and families, emphasizing the school’s mission to meet these needs. Reducing barriers and providing access to basics and academic services are key priorities of Rainbow Dreams Early Learning Academy. The school offers free before- and after-school care, along with food and backpacks containing essential items.

The Leadership team cited over twenty community partnerships—including Amazon, Nevada Partners, New Hope Church, and West Las Vegas libraries—that sustain programs and family outreach efforts. The leaders also noted that they received an Early Childhood Literacy Grant, resulting in increased funding after the first year.

Leaders reported current enrollment of 231 students, with a goal of 304. Previous enrollment ranged from 260 to 270 students. The pay differences with the local district challenge teacher retention. The leaders shared that a few years ago, they lost eight teachers to the local school district, primarily due to the pay differential, which posed a significant challenge. As a mitigation measure, the school established a university mentorship program in collaboration with a local college, designed to recruit aspiring educators. Additionally, the leadership team shared that two highly qualified kindergarten teachers, new to the school, took leave of absence from their previous district positions to support the team for the next three years.

Addressing student learning gaps and delays was noted as a challenge. The leaders described how student learning gaps are addressed using early education screening tools and differentiated instruction in small groups. A priority of the school is to ensure students' social and emotional needs are supported. The leaders shared details of the school’s systems, which include the school psychologist offering ongoing staff professional development in trauma-informed practices and social-emotional support.

The session also accentuated the leaders' appreciation for staff, sharing stories of teamwork and community. One story involved ten staff members working over the weekend to prepare a classroom after a colleague resigned for personal reasons. One leader added, “We have a very passionate staff,” underscoring their support of the school and its stakeholders.

Focus Group Summary: Students

Student focus groups typically consist of students from grades three to twelve. However, due to Rainbow Dreams Early Learning Academy's unique school model, which specifically serves pre-kindergarten and kindergarten students, the focus group consisted of a younger student population than most SPCSA student focus groups.

Sixteen early education students participated in the focus group. When asked what each student was good at today, responses included "I am good at dancing," and "I am good at playing with toys." Other responses included going to the pool and singing. The students were asked to share what they were learning in their classrooms. The students eagerly shared their responses, noting that some had learned how to count and identify different types of shapes, such as an octagon, in math. Other students said they were learning the Pledge of Allegiance, sight words, and the letters of the alphabet.

When requested to discuss what made them happiest in school, responses were "being nice to my friends" and "when my friend is nice to me." Other students cited playing together, learning about colors, shapes, and dinosaurs. The discussion transitioned to having the students reflect on the problems they had solved that day and share their responses. Several students shared their experience of getting hurt (tripping) and seeking out the health office personnel to obtain a bandage. Several students commented that they helped their friend.

The students were also asked to share if they had used their imagination in school that day. One student stated that he had drawn Spiderman, another said she had drawn a unicorn, and another student shared that he had performed a magic trick. Several students mentioned using their imagination to complete an art activity, and one stated that her imagination helped plan a birthday party.

Overall, the focus group provided valuable insight into the learning experiences and social-emotional development of Rainbow Dreams Early Learning Academy's young students. Their responses demonstrated enthusiasm for learning, creativity, and kindness toward peers, key indicators of a nurturing early childhood environment. The discussion reflected the school's commitment to fostering curiosity, foundational academic skills, and positive social interactions, aligning with its mission to lay the foundation for future academic success.

Classroom Environment and Instruction

Observation Rubric

A total of 11 pre-kindergarten and 8 kindergarten classrooms in the early elementary school setting were observed for approximately 15 minutes on the day of the site evaluation.

Classroom Environment					
	Distinguished	Highly Proficient	Approaching Proficient	Unsatisfactory	Not Observed
Classroom Learning Environment is Conducive to Learning	The teacher demonstrates knowledge and caring about individual students' lives beyond the class and school. When necessary, students respectfully correct one another. Students participate without fear of put-downs or ridicule from either the teacher or other students. The teacher respects and encourages students' efforts.	Talk between the teacher and students and among students is uniformly respectful. The teacher successfully responds to disrespectful behavior among students. Students participate willingly but may be somewhat hesitant to offer their ideas in front of classmates. The teacher makes general connections with individual students.	The quality of interactions between teachers and students, or among students, is uneven, with occasional disrespect or insensitivity. The teacher attempts to respond to disrespectful behavior among students with uneven results. The teacher attempts to make connections with individual students, but student reactions indicate that these attempts are not entirely successful.	The teacher is disrespectful toward or insensitive to students' ages, cultural backgrounds, and developmental levels. Students' body language indicates feelings of hurt, discomfort, or insecurity. The teacher displays no familiarity with, or care about, individual students.	This criterion was not observed or rated.
	TOTAL: 0	TOTAL: 17	TOTAL: 2	TOTAL: 0	TOTAL: 0
Establishing a Culture for Learning	The teacher communicates passion for the subject. Students indicate through their questions and comments a desire to understand content. Students assist their classmates in understanding the content.	The teacher communicates the importance of the content and the conviction that with hard work all students can master the material. The teacher conveys an expectation of high levels of student effort. Students expend good effort to complete work of high quality.	The teachers' energy for the work is neutral. The teacher conveys high expectations for only some students. Students exhibit a limited commitment to completing the work on their own. The teacher's primary concern appears to be to complete the task at hand.	The teacher conveys that there is little or no purpose for the work, or that the reasons for doing it are due to external factors. The teacher conveys to at least some students that the work is too challenging for them. Students exhibit little or no pride in their work.	This criterion was not observed or rated.
	TOTAL: 0	TOTAL: 16	TOTAL: 3	TOTAL: 0	TOTAL: 0

Classroom Environment and Instruction

Observation Rubric

A total of 11 pre-kindergarten and 8 kindergarten classrooms in the early elementary school setting were observed for approximately 15 minutes on the day of the site evaluation.

Classroom Instruction					
	Distinguished	Highly Proficient	Approaching Proficient	Unsatisfactory	Not Observed
Communicating with Students	If asked, students can explain what they are learning and where it fits into the larger curriculum context.	The teacher states clearly, at some point during the lesson, what the students will be learning.	The teacher provides little elaboration or explanation about what students will be learning.	At no time during the lesson does the teacher convey to students what they will be learning.	This criterion was not observed or rated.
	The teacher explains content clearly and imaginatively.	The teacher's explanation of content is clear and invites student participation and thinking.	The teacher's explanation of the content consists of a monologue, with minimal participation or intellectual engagement by students.	Students indicate through body language or questions that they don't understand the content being presented.	
	The teacher invites students to explain the content to their classmates.	The teacher makes no content errors.	The teacher may make minor content errors.	Students indicate through their questions that they are confused about the learning task.	
	Students use academic language correctly.	Students engage with the learning task, indicating that they understand what they are to do.	The teacher must clarify the learning task.		
	TOTAL: 1	TOTAL: 14	TOTAL: 3	TOTAL: 0	TOTAL: 1
Using Questioning and Discussion Strategies	Students initiate higher-order questions.	The teacher uses open-ended questions, inviting students to think and/or offer multiple possible answers.	The teacher frames some questions designed to promote student thinking, but many have a single correct answer.	Questions are rapid-fire and convergent with a single correct answer.	This criterion was not observed or rated.
	The teacher builds on and uses student responses to questions to deepen student understanding.	Discussions enable students to talk to one another without ongoing mediation by the teacher.	The teacher invites students to respond directly to one another's ideas, but few students respond.	The teacher does not ask students to explain their thinking.	
	Students extend the discussion, enriching it.	Many students actively engage in the discussion.	The teacher calls on many students, but only a small number participate.	Only a few students dominate the discussion.	
	Virtually all students are engaged.				
	TOTAL: 0	TOTAL: 11	TOTAL: 6	TOTAL: 0	TOTAL: 2

Classroom Environment and Instruction

Observation Rubric

A total of 11 pre-kindergarten and 8 kindergarten classrooms in the early elementary school setting were observed for approximately 15 minutes on the day of the site evaluation.

Classroom Instruction					
	Distinguished	Highly Proficient	Approaching Proficient	Unsatisfactory	Not Observed
Engaging Students in Learning	Virtually all students are engaged in the lesson. Lesson activities require high-level student thinking and explanations of their thinking. Students have an opportunity for reflection and closure on the lesson to consolidate their understanding.	Most students are intellectually engaged in the lesson. Most learning tasks have multiple correct responses or approaches and/or encourage higher-order thinking. Students are invited to explain their thinking as part of completing tasks. The pacing of the lesson provides students with the time needed to be intellectually engaged.	Some students are intellectually engaged in the lesson. Learning tasks are a mix of those requiring thinking and those requiring recall. Student engagement with the content is largely passive. The pacing of the lesson is uneven—suitable in parts but rushed or dragging in others.	Few students are intellectually engaged in the lesson. Learning tasks, activities, and materials require only recall or have a single correct response. The lesson drags on or is rushed.	This criterion was not observed or rated.
	TOTAL: 1	TOTAL: 10	TOTAL: 8	TOTAL: 0	TOTAL: 0
Using Assessment in Instruction	Students indicate they clearly understand the characteristics of high-quality work. The teacher uses multiple strategies to monitor student understanding. Students monitor their own understanding. Feedback comes from many sources.	The teacher makes the standards of high-quality work clear to students. The teacher elicits evidence of student understanding. Students are invited to assess their own work and make improvements. Feedback includes specific and timely guidance.	There is little evidence that the students understand how the work is evaluated. The teacher monitors understanding through a single method, without eliciting evidence of understanding from students. Feedback to students is vague.	The teacher does not indicate what quality work looks like. The teacher makes no effort to determine whether students understand the lesson. Students receive no feedback, or feedback is global or directed to one student.	
	TOTAL: 0	TOTAL: 15	TOTAL: 4	TOTAL: 0	TOTAL: 0

Classroom Observations and Additional Comments

In a Pre-Kindergarten classroom, students were engaged in a range of designed learning centers. Activities such as completing puzzles, engaging in dramatic play, measuring objects with Unifix or interlocking cubes, building with Legos, and exploring kinetic sand fostered both cognitive and social development. The two teachers actively circulated throughout the room, asking open-ended questions and intentionally extending learning through meaningful, play-based interactions with each child.

Seventeen pre-kindergarten students participated in a hands-on size-sorting activity led by two staff members. Students remained focused and engaged while working independently at their assigned seats, cutting, sorting, and coloring materials. The staff members circulated throughout the classroom, offering support and posing clarifying questions to deepen understanding. Interactions between the teachers and students, as well as among the students themselves, were consistently respectful. The teachers set high expectations for student effort and demonstrated effective instructional strategies, such as providing adequate waiting time for students to formulate thoughtful responses.

Kindergarten students engaged in independent learning using Starfall, an online platform designed to develop foundational English reading and writing skills. Each student worked at their own pace on individualized lessons, which included interactive phonics games and short stories. The teacher actively monitored student progress and provided support as needed. The classroom environment was focused and well-structured, supporting productive and meaningful learning.

During a sorting activity, students categorized objects into three sizes—small, medium, and large—by cutting out and gluing pictures. One teacher provided individualized support by helping a student use scissors, incorporating a child-friendly chant to guide the process and build fine motor skills. Throughout the activity, teachers consistently offered praise and encouragement. Additionally, a teacher used targeted questioning about the size of each shape to reinforce student understanding and facilitate successful task completion.

In a kindergarten math classroom, students engaged in a lesson that began with a short video on counting, prompting them to count and sing along from their seats. The teacher then led a warm-up activity before introducing the "solve-and-share"¹⁸ math worksheet. While students participated actively, the teacher assessed understanding using only one method and did not gather multiple forms of evidence to ensure all students grasped the concepts. Incorporating a variety of formative assessment strategies could provide a clearer picture of student understanding and better support for individual learning needs.

Students participated in a multi-step lesson that integrated critical thinking, discussion, and hands-on learning. They began by taking turns placing their name cards on the board while identifying a washing machine, responding to the teacher's prompt, "How do we know this is a washer and not a dryer?" with

¹⁸ The Solve and Share is an instructional routine that promotes effective teaching practices. It opens each lesson with a rich problem that engages and explores new mathematical concepts for students to explore.

thoughtful observations such as noting the presence of soap or water. The teacher facilitated smooth classroom transitions by encouraging students to tiptoe back to their seats, and students followed directions effectively. The lesson progressed with a Know, What to Know, and Learned,¹⁹

(KWL) chart, which focused on the question, “Why are clothes different sizes?” where students shared the sizes of their own shirts. To reinforce the concept, the teacher introduced a hands-on activity in which students cut and sorted shirt images into size categories. The teacher also prewrote students' names in highlighter on each assignment, providing an opportunity for students to practice name tracing as they began the lesson.

Seventeen pre-kindergarten students participated in a language-rich activity focused on the letter “F” and the word “fish.” Students demonstrated high engagement and independence as they cut out and colored the letter at their assigned desks, while the teacher actively monitored their progress. Students used appropriate classroom voices to ask questions and share ideas, fostering a collaborative learning environment. The teacher provided targeted feedback and individualized guidance to support students who needed additional assistance.

The teacher began the math lesson by distributing worksheets and giving brief verbal instructions but did not review the learning objectives or clearly articulate the lesson’s purpose. Although students repeated words such as “color” and “boxes,” many appeared disengaged during this part of the lesson. After distributing pencils, students were expected to start working independently; however, when one student asked for clarification, the teacher responded, “I just told you what to do.” The transition into the math activity lacked structure, and the absence of clear directions and student engagement led to students being off task and a prolonged transition period.

In a kindergarten classroom, the teacher presented a lesson on story elements, including title, author, illustrator, main characters, and setting, using the book “A Pocket for Corduroy.” To activate prior knowledge, the teacher began by asking students background questions about Corduroy from previous stories and briefly discussed the author. Students listened attentively and participated by answering questions individually while sitting at their assigned desks. The teacher then displayed a worksheet with story elements on the screen, reviewing each element and engaging students in discussion to reinforce understanding.

Students were engaged in coloring patterned shirts, with the teacher reminding them to take their time and color within the lines carefully. Most students remained focused, and on task. A guiding question on the board asked, “Is the tag inside your shirt marked with a number or a letter (S, M, L)?” This prompted a quiet discussion between the teacher and the students. When one student rushed through the activity, the teacher gently addressed him, encouraging a slower pace and inviting him to try again.

The teacher facilitated a class discussion focused on the question, “How can we get along with friends?” She encouraged student participation by calling on those who raised their hands and fostered a respectful

¹⁹ A KWL chart is a graphic organizer used in education that stands for Know, What to Know, and Learned.

classroom environment as students listened to each other's ideas. To reinforce positive behavior, the teacher praised students for meeting class expectations. Using a projected image of two children making shapes with dough, the teacher prompted students to describe what they observed. When a student noted that the children appeared happy, the teacher deepened the discussion with probing questions such as, "What makes you think they look happy?" and "What are they doing to show that?" This approach encouraged students to think critically and observe details closely.

Measures of Progress from Previous Site Evaluation

The extent to which the school has been successful in maintaining areas of strength, removing challenges, and acting upon the recommended items made by the SPCSA Site Evaluation Team during the school's previous site evaluation.

The school is in its first year with the SPCSA. Therefore, there are no previous recommendations.

Prior Recommendation by Site Evaluation Team	School Assessment of Progress	SPCSA Staff Assessment of Progress
N/A	N/A	N/A

Operational Compliance Checks

Fire Extinguisher	☒ YES	☐ NO	
Nurse's Station	☒ YES	☐ NO	
Evacuation Plan in Classrooms	☒ YES	☐ NO	
Food Permit	☒ YES	☐ NO	☐ N/A
Elevator Permit	☐ YES	☐ NO	☒ N/A

Part 2

Rainbow Dreams Early Learning Academy Risk Based Monitoring Report

Executive Summary

Per NRS 388A.150, the SPCSA is responsible for providing oversight of the charter schools it sponsors. This includes conducting site evaluations during the first, third, and fifth years of the charter contract and, as needed, to follow up on strong recommendations or identified deficiencies. The SPCSA is committed to ensuring a smooth, meaningful, and timely process using a well-designed, intentional, research-based protocol.

Additionally, as a pass-through entity of federal funds, the SPCSA is required to conduct risk assessments of subrecipients in accordance with 2 C.F.R. §200.332(b). These assessments evaluate compliance with program and fiscal requirements but do not measure the quality or determine future eligibility.

Risk Based Monitoring: (1) Visit Details

Location	Rainbow Dreams Early Learning Academy 950 West Lake Mead Boulevard, Las Vegas, NV 89106
Financial Period or Fiscal Years/ School Years Covered	07/01/2024 – 06/30/2025
Date(s) and time(s) of Monitoring	Tuesday, September 30, 2025 11:30AM – 3:30PM
Objectives	• Review the capacity, performance, and compliance of a subrecipient charter school • Address high-risk and specific issues that need immediate attention • Determine fidelity of program delivery • Ensure that any subaward of federal funds is used for authorized purposes; in compliance with federal statutes, regulations, and the terms and conditions of the subaward; and that subaward performance goals are achieved
Date of Report	October 16, 2025

Risk Based Monitoring: (2) School Overview

- Total Number of Students: 229
- Grade Levels: Pre K – K
- Grants with Active Subawards:
 - FY26 Special Education (IDEA, Part B)
- Grants with Allocations (subaward pending):
 - FY26 Nevada Ready State Pre-K
 - FY26 Title II, Part A
 - FY26 Title II, Part A, Off Set - State
- Total Federal Funds Expended in Previous FY (FY25): Not applicable – not a part of the SPCSA portfolio
- Single Audit Required: N/A
- Current Risk Level: High
- Prior Risk Level: Not applicable – not a part of the SPCSA portfolio

Risk Based Monitoring: (3) Scope of Review/Methodology

The following activities were completed during this monitoring visit:

- Scope of fiscal review:
 - Fiscal Administrative requirements, including:
 - Compliant system of internal controls
 - Compliant system to determine allowability of costs
 - Compliant financial management and accounting system
 - Compliant procurement system
 - Compliant plan for audit resolution
 - Compliant system for inventory management
 - Compliant system for records retention
 - Appropriate use of funds (Monitored in conjunction with review of program implementation)
- Scope of program review:
 - Special Education
 - IEP development, meeting and record maintenance process aligned to federal and state requirements
 - IEP(s) are fully implemented
 - Progress monitoring is regularly conducted in accordance with IEP, federal/state requirements and best practices
 - Ongoing parent communication, participation, and engagement
 - Special Education IEP/file review
 - Title IA
 - Program development included needs assessment, community outreach (parents, teachers, school staff, students) and alignment to School Performance Plan: Road Map to Success (“SPP”)
 - Program implementation aligns to federal requirements and program plan
 - School has worked to ensure effective involvement of parents and the community to improve student academic achievement
 - School regularly collects data and monitors progress towards goals and intended outcomes
 - For CSI, TSI, TSI/ATSI schools, evidence that the school is making progress towards exiting the designation
 - Additional Areas
 - McKinney-Vento
 - Foster Care

Risk Based Monitoring: (4) Summary of Visit

The following tables identify areas of strength, recommendations, and issues identified during this monitoring visit. Issues identified are based on the school's preparation of supporting documentation and presentation of information. These findings are not exhaustive, and additional concerns may exist that were not observed during the review. It is the responsibility of the school to engage in ongoing internal oversight of grants and grant management processes to ensure compliance with all federal and local statutes, regulations, and policy requirements.

- Areas for improvement have been identified. A School Support Plan is required.

Risk Based Monitoring: (4.1) Area of Strength

Monitoring Area: Fiscal

The leadership and fiscal team at Rainbow Dreams Early Learning Academy (RDELA) shared a warm and professional demeanor, fostering a welcoming and transparent atmosphere during interactions with SPCSA staff. Embedded in RDELA's policies and procedures is a rich and accessible internal controls framework that allows current and future staff to complete fiscal tasks successfully and in alignment with Uniform Guidance. Their policies and procedures showcase excellence and outline clear, thoughtful instruction throughout. Leadership and fiscal staff at RDELA expressed a strong willingness to revise or improve any policies, procedures, and operational practices identified by the SPCSA fiscal team to support sustainable grant management and alignment with federal requirements.

Monitoring Area: Special Education- Program

The school leader at Rainbow Dreams Early Learning Academy was welcoming and shared insightful background information about the school's mission and development. Serving students from PK3 through kindergarten, RDELA offers numerous supports to its families, including free before- and after-school care (Dream Care), as well as complimentary school supplies, snacks, and uniforms. At the time of the visit, the school's special education population was small. The Special Education Director oversees compliance and documentation while also providing direct services to students. During the special education monitoring session, all required documents were readily available, and the Special Education Director provided clear explanations about the school's implementation of special education procedures. A randomly selected student file was reviewed and found to be generally compliant. The Special Education Director was engaged, open to feedback, and demonstrated a strong commitment to maintaining and improving the quality of the school's special education program.

Monitoring Area: Title IA

The school does not receive Title I funding; not applicable

Monitoring Area: Title II – Program

Rainbow Dreams Academy demonstrates a strong commitment to educator growth and student success through the effective use of Title II funding. The school strategically invests these funds in high-quality professional development opportunities designed to equip teachers with the tools, strategies, and resources necessary to meet the diverse academic and social-emotional needs of all students. By prioritizing targeted training and continuous instructional support, the school fosters a culture of ongoing improvement and instructional excellence.

Monitoring Area: Title III – Program

The school does not receive Title III funding; not applicable.

Monitoring Area: Title IV – Program

The school does not receive Title IV funding; not applicable.

Monitoring Area: Additional Areas: McKinney Vento and Foster Care

Rainbow Dreams Academy supports McKinney-Vento and Foster Care students and their families with a comprehensive community resources guide and assists with transportation needs through the provision of bus passes. The school partners with the School Bell program to provide clothing and school supplies, and it has also supported families in obtaining birth certificates. Additionally, Rainbow Dreams Academy offers internet access through hot spots, distributes personal hygiene items and groceries, and maintains a technology lending library for families in need of additional support.

Risk Based Monitoring: (4.2) Area of Improvements/Recommendations

Monitoring Area: Fiscal

The SPCSA recommends strengthening the following areas in the school's written policies and procedures: Note": "Criteria Reference" refers to the *FY25-26 Fiscal Policies and Procedures Self-Evaluation Checklist*, which schools used to build their Fiscal Policies and Procedures in alignment to Uniform Guidance. [FY25-26 Fiscal Policies and Procedures Self-Evaluation Checklist](#).

1. Suggestions for Allowability of Costs:
 - *Criteria Reference: School Self Evaluation Checklist – Allowability of Costs #6, Page 40:* SPCSA recommends changing "single federal program" to "single federal program or single cost objective".
 - *Criteria Reference: School Self Evaluation Checklist – Allowability of Costs #7:* Incorporate a compliant SPCSA Travel Reimbursement Request form. This can be found in the SPCSA Grants Administration Canvas Training Modules: [SPCSA Travel Request Form](#)
 - Travel Policy [OC580 \(Travel\) Reimbursement Request Documentation Requirements](#)
 - *FY27 New Policies:* Review and incorporate the two (2) new Fringe Benefits and Health and Welfare policies and procedures. Both are *required* starting in FY27 (2026-2027 school year). Sample policies and procedure guides are available in the SPCSA's Risk Based Monitoring Canvas repository:
 - [Canvas Repository - Risk Based Monitoring Modules](#)
 - [Health and Welfare P&P](#)
 - [Fringe Benefits P&P](#)
2. Suggestions for Financial Management Systems:
 - *Criteria Reference: School Self Evaluation Checklist – Accounting and Financial Management Systems #9:* Include language stating that requested fiscal or programmatic performance reports required by the federal award will be submitted annually, as requested by the SPCSA, NDE, or Federal agency.
3. Suggestions for Procurement Systems:
 - *Criteria Reference: School Self Evaluation Checklist – Procurement Systems #4, Page 52:* Fully define what "Immediate Family" entails and include any persons who could present in conflict of interest. Immediate family ties include (whether by blood, marriage, or adoption): spouse, parent (including a stepparent), child (including a stepchild), brother, sister (including a stepbrother or stepsister), grandparent, grandchild, and in-laws of a covered person. Employees, officers, agents, and board members of the recipient or subrecipient may neither solicit nor accept gratuities, favors, or anything of monetary value from contractors.

4. Suggestions for Inventory Management:

- *Criteria Reference: School Self Evaluation Checklist – Inventory Management #3, Page 60:* Revise the line, “Note: Equipment does not need to include fund source, cost, date or the other items required to be present on the full inventory list” to clarify that *labels* for these items do not require all of the above information. A serial number or other tracked identifier on the item will suffice.

A list of Object Code Quick Guides for Reimbursement Request (RR) documentation requirements can be found in the SPCSA’s Grants Administration Canvas Repository:

- [SPCSA Grants Administration Canvas Training Modules](#)

Regularly monitor and submit all required federal and state grant-related compliance reports in Epicenter by the assigned deadlines. Once grant funds are awarded, recipients are required to report information to federal and/or state agencies on the use of funds. A list of known federal and state fiscal Epicenter reporting requirements, along with anticipated due dates, is available in the SPCSA’s Grants Administration Repository:

- [Fiscal Epicenter Reporting Requirements](#)

It is recommended that school and contracted staff responsible for grant management continue annual professional learning on Uniform Guidance topics, based on industry best practices and federal regulations, to strengthen subaward performance and compliance. Recommended organizations include:

- Brustein and Manasevit
- National Association of Federal Education Program Administrators (NAFEPA)
- National Grants Management Association (NGMA)

Monitoring Area: Special Education- Program

The SPCSA outlines the following requirements and best practices to strengthen the school’s written policies, procedures, and program implementation:

- Ensure that the Records Access List is displayed and posted near the location where confidential special education folders are stored, and that it is kept up to date with the names of staff authorized to access the files.
- Ensure that all confidential folders contain a file access log.
- Refrain from using statements such as "No effect statement needed" or any of its variations in the third column of the PLAAFPs. Always provide a statement indicating whether the student does or does not need support and/or services in a particular area to make progress.
- The SPCSA recommends consistent practice in discussing with parents or guardians whether an interpreter is needed for special education meetings when their child is identified as LEP, even if English is listed as the student's primary language. Indicate whether the parent accepted or declined the interpreter by logging the information in the student's confidential folder status log.
- For EL students receiving special education services, ensure that the most recent WIDA ACCESS or screener scores are included in the PLAAFPs. Additionally, Special Factors #3 must be marked as "Yes." Supplementary Aids and Services must include accommodations/supports that address the student's language development needs based on the most recent EL assessment scores.

- Include information on the areas in which the student will receive SDI and/or Related Services in the Intent to Implement form.
- Provide the first Prior Written Notice (PWN) to the parent within a reasonable time (ten days) prior to the meeting.
- Develop IEP goals that include both a rate/level of proficiency/mastery and a frequency or level of attainment to ensure measurable progress toward goals and allow for replication of the proficiency/mastery. *Example: 80% accuracy in 4/5 trials*
- Review the SPCSA Memo from 9/9/2024 regarding compliant service logs and ensure that the school uses service logs that include all required documentation areas. Staff must regularly complete service logs and place copies in the student's confidential folder or uploaded them to Infinite Campus.
- Review the required information for PWN, PLAAFP, and the transition section of the student's IEP.
- In upcoming IEPs, ensure that the Present Level of Academic and Functional Performance (PLAAFP) includes a clear and concise summary of the most recent MDT evaluation results. This summary should directly connect the evaluation data to the student's current educational needs and include an Effects Statement that describes how the disability impacts the student's learning and participation in the general education curriculum.
- Strengthen staff capacity through ongoing training and oversight on special education policies, procedures, and practices, while ensuring participation in SPCSA training opportunities.
- Ensure all staff have ready access to the school's Special Education Policies and Procedures Manual to reference IDEA/IEP requirements and maintain compliance.
- Regularly monitor and track due dates for evaluations, IEP meetings, and required special education reports to ensure all timelines are met in accordance with IDEA, NAC, and SPCSA requirements.

A list of additional resources and links is provided in a separate document to support the school's special education program.

Monitoring Area: Title IA

The school does not receive Title I funding; not applicable. There are no areas of improvement or recommendations at this time.

Monitoring Area: Title II – Program

Continue strengthening the professional development planning process by incorporating ongoing progress monitoring to assess the effectiveness of implemented trainings. Consider developing a system to track how professional learning impacts classroom instruction and student outcomes over time. Additionally, expand opportunities for teachers to share best practices and lead peer-to-peer learning sessions.

Monitoring Area: Title III – Program

The school does not receive Title III funding. However, it is still expected to complete the NDE Desktop Monitoring tasks for Title III by the specified due date in Epicenter once they become available.

Monitoring Area: Title IV – Program

The school does not receive Title IV funding. There are no areas of improvement or recommendations at this time.

Monitoring Area: Additional Areas: McKinney Vento and Foster Care

- McKinney Vento: To ensure continued compliance with the [McKinney-Vento Homeless Assistance Act](#), the SPCSA recommends that Rainbow Dreams Academy continue to utilize the McKinney-Vento Non-Regulatory Guidance as a key resource. This guidance provides clear, actionable strategies for supporting students experiencing homelessness, aligning with federal requirements while addressing the unique needs of this vulnerable population.
- Foster Care: It is expected that the school will continue submit the completed Foster Care Policy to Epicenter annually.

Risk Based Monitoring: (4.3) New School Support Plan

Any issues identified below require an improvement plan. The table below describes the conditions found during this monitoring visit.

Monitoring Area: Fiscal Internal Controls

Issues Identified:

• Conditions Found Not in Compliance:

The following required written policies and procedures are not in compliance with the Uniform Guidance and indicate deficiencies in internal controls:

- o Internal Controls
- o Accounting and Financial
- o Management Systems

• Cause of Deficiency:

The segregation of duties among responsible parties for the management of grant funds including specific personnel positions and relevant personnel from financial services providers, EMOs, or CMOs is not sufficiently documented in the school's written policies and procedures to meet compliance with the Uniform Guidance.

• Effect of Deficiency:

Grant-related processes conducted without proper segregation of duties may result in misuse, waste, fraud, or abuse of federal funds, thereby undermining the integrity of the school's operations.

Criteria Used

- 2 CFR § 200.303

Improvement Plan:

Develop appropriate written policies and procedures, document business processes for grants, and ensure all required internal controls are included within each policy.

- *Criteria Reference: School Self Evaluation Checklist – Internal Controls #4, pages 26-27:*
 - Under *Authorizing and Processing* and *Government Oversight*, there is mention of a Chancellor position. This role is not described or referenced elsewhere in the document. During the visit, it was noted that this may be synonymous with or overlapping another role. All job positions must be clearly defined, with language that demonstrate segregation of duties. An individual staff member cannot “wear many hats” or hold overlapping roles that could violate segregation of duties, potentially placing the charter school out of compliance with approval and authorization processes.
 - Clarify this role or remove it entirely if it is not applicable. During an audit, the SPCSA will verify compliance in this area by reviewing items such as training-related documents, an organizational chart with clear reporting lines, and any tools or

checklists used to ensure key control activities are carried out in alignment with the written policies and procedures.

Monitoring Area: Fiscal Internal Controls

Issues Identified:

- **Conditions Found Not in Compliance:**

The written financial management and accounting systems policies and procedures are not fully compliant with the Uniform Guidance.

- **Cause of Deficiency:**

The charter school's financial reports and/or records do not contain sufficient detail as required under federal law.

- **Effect of Deficiency:**

Current business processes are not fully compliant with Uniform Guidance. This may result in improper controls over financial record keeping of grant budgets and/or incorrect tracing of funds to a level of expenditures adequate to establish that such funds have been used according to Federal statutes and regulations.

Criteria Used

- 2 CFR § 200.302
- 2 CFR § 200.303

Improvement Plan:

Develop compliant written policies and procedures. Relevant staff should become familiar with documented processes. The policies and procedures should address all required Uniform Guidance requirements for fiscal management and accounting, and include key processes related to:

- Grant tracking
- Fiscal and accounting management
- Grant reconciliations Procurement
- Reimbursement requests
- Cash management

Complete and submit the following to the SPCSA:

Criteria Reference: School Self Evaluation Checklist – Accounting and Financial Management Systems #7:

- Although not explicitly mandated in the CFR, it is considered a strong internal control to utilize pre-numbered checks for recordkeeping and fraud prevention, which RDELA has embedded into its policies and procedures.
- A requirement to be added to the statement on page 48 “pre-numbered checks are used for fraud prevention” is that a minimum of two (2) signatures on checks is required. The SPCSA could not verify any mention of this requirement.
 - The SPCSA will audit these areas by verifying that the charter school’s written accounting and fiscal management policies and procedures include language stating that all disbursements except petty cash or Electronic Funds Transfer (EFTs) are made by check, and that these checks require two or more signatures from appropriate staff.

Monitoring Area: Program: Special Education

Issues Identified:

• **Conditions Found Not in Compliance:**

No clear Effects statements (third column of PLAAFPs) were provided for areas that were not identified as deficient. Instead of documenting how or if the student's disability affects involvement and progress, staff defaulted to a blanket phrase ("No Effects Statement Required").

• **Cause of Deficiency:**

The cause of the deficiency may be due to expectations or practices established by the school's former district.

• **Effect of Deficiency:**

Including a clear Effects Statement in the PLAAFP is essential, as federal requirements specify that it must describe how the child's disability impacts their involvement and progress in the general education curriculum. A well-written Effects Statement also provides the foundation for determining appropriate goals, supports, accommodations, and specialized instruction.

Criteria Used

- NAC 388.284
- 34 CFR 300.320

Improvement Plan:

To strengthen the quality and compliance of IEP development, schools must ensure that all PLAAFP sections include individualized Effects/Impact Statements. These statements should clearly describe how the student's disability does (or does not) affect access to, progress in, and involvement with the general education curriculum and setting. Please avoid the use of generic phrases such as "No effects needed," "x," "none needed," "see above," or "see previous IEP."

If a particular area is not impacted by the student's disability, the PLAAFP should include a clear statement indicating that the student is able to access the general education curriculum without the need for supplemental services or supports. The school should submit evidence of correction to the SPCSA:

1. Specific to this File: Submit the student's next IEP, which must include corrected PLAAFP Effects Statements that meet the expectations outlined above. Submit the finalized IEP, with appropriate signatures of meeting participants, to the SPCSA.
2. Submit an acknowledgement form, signed by all applicable staff (including contracted service providers, if applicable), confirming that they have received and reviewed training on this requirement.

Please utilize the following resources for additional guidance on writing compliant IEP Effects Statements:

- December 2024 Partners for Inclusive Education (PIE) slides 9-13
- December 2024 Partners for Inclusive Education (PIE) recording (from 15:45 – 22:40)

If an area in the Present Levels of Academic and Functional Performance (PLAAFP) is **not** identified as an area of deficiency, a statement such as the one below may be used instead of phrases like "No Effects statement needed":
(Student's name) does not require special education services or supports in this area in order to make progress in the general education curriculum.

Monitoring Area: Program: Special Education

Issues Identified:

- **Conditions Found Not in Compliance:**

The Participation in Statewide/Districtwide Assessments section of the IEP was not completed accurately. The selected assessment (CRT-applicable beginning in 3rd grade) was included for the student who is currently in KG.

- **Cause of Deficiency:**

The cause of the deficiency is unknown.

- **Effect of Deficiency:**

When the Participation in Statewide/ Districtwide Assessments section includes assessments that do not apply to the student's current grade level, it results in inaccurate documentation of how the student will participate in required assessments. Inaccurate documentation also prevents the IEP from serving as a reliable record of the student's educational program and places the school at risk of noncompliance with state and federal assessment participation requirements.

Criteria Used

- NAC 388.284
- 34 CFR 300.320(a)(6)

Improvement Plan:

To strengthen the quality and compliance of IEP development, it is essential that the Participation in Statewide and Districtwide Assessments section accurately reflects the student's current grade level and applicable assessments. Selecting the correct assessment ensures that staff have clear guidance on the student's participation requirements and that state and district reporting are accurate. When an assessment not applicable to the student's grade level is selected, it can cause confusion during test administration, lead to reporting inaccuracies, and misrepresent the student's educational program.

Strengthening this practice promotes accuracy, consistency, and compliance with IDEA and NAC requirements, while supporting proper planning for future assessment participation.

The school should submit evidence of correction to the SPCSA:

1. **Specific to the File:** Submit the student's next IEP, which must include the corrected Participation in Statewide/Districtwide Assessments section. This section must accurately identify only the assessments applicable to the student's current grade level, in accordance with state assessment participation requirements. Submit the finalized IEP, with appropriate signatures of IEP meeting participants, to the SPCSA.
2. Submit an acknowledgement form signed by all applicable staff (including contracted service providers, if applicable), confirming that they have received and reviewed training on accurately completing the Participation in Statewide/Districtwide Assessments sections of the IEP based on the student's grade level and assessment eligibility.

Part 3

Rainbow Dreams Early Learning Academy School Response

Appendix A

The school may choose to submit a response to the SPCSA Site Evaluation Team's findings. This response will be included with the report in the public domain. The final report is submitted to the school's leadership and governing board, the SPCSA board, and into the public record via the SPCSA's website.

From: Janice Henry <janice.henry@rdacharter.org>
Sent: Wednesday, November 5, 2025 6:52 PM
To: MonitoringandEvaluation@SPCSA.nv.gov
Subject: Re: Final Draft Site Evaluation Report-Rainbow Dreams Early Learning Academy
Categories: Evaluation Response

Good evening,

Thank you so much for your assistance and reassurance throughout this process. There are a couple of areas we would like to clarify in the Evaluation Report.

First, we would like it noted that further investigation into the chronic absenteeism rate is needed. Based on our school records, it does not appear that our chronic absenteeism percentage could be as high as 20%. Our attendance summary report for the same year—generated through Infinite Campus—shows an attendance rate of 92.31%.

Second, we would like to clarify that our two highly qualified kindergarten teachers were **not** recruited from a local foundation. It appears there may have been a misunderstanding when we were discussing the Rainbow Dreams Educational Foundation. Both new teachers took a leave of absence from their district positions to support our team for the next three years.

We appreciate your attention to these clarifications and your continued support. Sincerely,

Janice D. Henry

Principal / Executive Director

Rainbow Dream Early Learning Academy 950 W. Lake Mead Blvd

Las Vegas, NV 89106

702.638.0222 Office

702.638.0220 Fax



"Inside Every Child Is A Rainbow Waiting To Shine"