



Nevada State Public Charter School Authority

Odyssey Charter School

Site Evaluation and Risk Based Monitoring Report: September 24, 2025

State Public Charter School Authority

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Links to 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

Odyssey Charter School 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 conduct 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.

Star ratings in middle and elementary school

One of Odyssey Charter School's strengths is its strong performance on the Nevada School Performance Framework¹ (NSPF), particularly in middle and elementary schools. The middle school earned a five-star rating with an index score of 84.5 out of 100, while the elementary school received a solid four-star rating with an index score of 76.1 out of 100. Notably, both schools achieved a perfect score, 10 out of 10, on the Closing Opportunity Gaps Indicator² in English Language Arts (ELA), demonstrating that students who were previously not proficient in the subject are now meeting grade-level expectations. A key factor contributing to these successes is the school's low student-to-teacher ratio in both its online and face-to-face learning models, which allows for more individualized instruction and targeted academic support.

Career and technical education

Another strength of Odyssey Charter School is its robust and expanding Career and Technical Education³ (CTE) program. The school currently offers specialized pathways in graphic design and cybersecurity, with plans to introduce a video game design track in the near future. These career-aligned programs not only support student engagement and skill development but have also contributed to a significant increase in the number of students earning college and career-ready diplomas. Over the past four years, the percentage of graduates receiving these diplomas has grown from 14% to 34%, underscoring the impact of Odyssey's commitment to workforce readiness and innovative programming.

Staying true to core values

Odyssey Charter School's core values: Students First, Unlimited Potential, Nurturing Community, and Readiness for Life were observed by the site evaluation team as being embedded in the school's culture and daily practices. These values were consistently reflected across student, parent, and staff focus groups, as well as classroom observations during the site evaluation. An example of the school's commitment to equity and student-centered enrichment is its policy of offering all clubs and extracurricular activities at no cost to students. This intentional decision ensures that financial barriers do not limit participation, allowing all students the opportunity to engage in meaningful experiences that foster personal growth, connection, and a sense of belonging.

Strong governing board

Odyssey Charter School benefits from a strong governing board that plays a vital role in the school's stability and strategic direction. Board members bring many years of collective expertise in areas such as education, finance, parent, and executive-level leadership. The board is well-versed and consistently

¹ NSPF is Nevada's public school rating system designed by Nevadans and developed in accordance with the federal Every Student Succeeds Act (ESSA) per NRS 385A.600 and classifies schools within a five-star performance rating system.

² The Closing Opportunity Gaps Indicator determines the percentage of students meeting their annual growth percentile who did not achieve proficiency in the prior year's state-administered criterion-referenced tests in English language arts and mathematics assessments

³ Career-focused experiential learning programs, sometimes called Career- Focused Experiential Learning Programs, provide students with opportunities to explore careers and gain marketable skills while still in high school.

trained in Nevada’s Open Meeting Law, ensuring transparency, accountability, and compliance in all decision-making processes.

Instructional materials for the online platform

Another strength of Odyssey Charter School is the use of clear, explicit instructional materials and assignments within its online learning platform, all of which are thoughtfully aligned to the Nevada Academic Content Standards⁴ (NVACS). Teachers demonstrate a high level of intentionality in planning, carefully selecting and organizing materials and resources that support the objectives of each lesson and unit of study. This deliberate approach ensures that students engage with rigorous, standards-based content and benefit from a cohesive instructional experience across grade levels and subjects.

Teacher retention and hiring process

One of Odyssey Charter School’s key strengths is its exceptional teacher retention and highly qualified instructional staff. School leadership reports that 100% of Odyssey’s teachers hold full credentials and meet the criteria for “highly qualified” status. For the 2025–26 school year, the school achieved a notable 97.5% teacher retention rate. This success is attributed to a rigorous, two-panel interview process that carefully selects educators who align with the school’s mission, values, and culture. As a result, Odyssey has cultivated a supportive and collaborative professional environment where educators feel respected, empowered, and committed to remaining with the school long-term.

⁴ Nevada Academic Content Standards (NVACS) are a set of grade level standards intended to provide a focus of instruction each year. They are a framework for curriculum and instruction in the state of Nevada.

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.

Facilities cost and long term planning

School leaders at Odyssey Charter School identified the cost of facilities as a significant and ongoing challenge. The school currently leases its instructional buildings, incurring a hefty annual rent. Despite the financial burden, efforts to secure a permanent or more cost-effective facility have been constrained by the limited availability of properties within the preferred geographic region. Addressing this challenge remains a strategic priority for the school as it plans for long-term sustainability and growth.

Cohesiveness among elementary, middle, and high schools

Another challenge identified by school leaders and instructional staff is maintaining clear and consistent communication regarding professional practices across the three school sites. Ensuring alignment among leadership and teaching teams is essential to support consistent implementation of instructional practices. Vertical alignment across the elementary, middle, and high school grades remains an area of focus to ensure continuity in academic expectations and instructional.

Math proficiency in high school

A challenge for Odyssey Charter School's high school is the math proficiency rates of the students. During the 2024-25 school year, math proficiency was 9.5%, a decline from only 11% in the previous school year (2023-24). In response, leadership has implemented math enrichment classes and an intensive ACT⁵ preparation class.

Support for families

School leaders reported that an ongoing challenge is providing families with additional support and resources in the online environment. These include parents understanding Tier 1⁶ instruction and Tier 2⁷ intervention strategies, developing effective time management strategies, and improving overall communication between families and the school.

Increased social-emotional issues in middle school

School leaders at Odyssey Charter School identified an increase in the social-emotional needs of middle school students as a challenge, particularly in the areas of anxiety and emotional regulation. Addressing these growing needs requires targeted support, resources, and staff training to ensure students are equipped to succeed both academically and personally. In response, school leaders have implemented intentional strategies to promote positive relationships and a strong sense of community.

⁵ ACT is an abbreviation for American College Test and is comprised of four distinct tests in English, math, reading, math and science. Many colleges and universities in the United States require this for-profit examination for college admissions.

⁶ Tier 1 instruction is the anchor of all tiered instruction. It is provided to all students every day. During Tier 1 instruction, teachers use scientifically researched programs and evidence-based practices, curricula, and strategies that have been proven effective for most students.

⁷ Tier 2 is the first level of intervention for students who do not show progress in Tier 1. Students are provided with Tier 2 interventions when they need support to meet academic or behavior goals.

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. [Click or tap here to enter text.](#)

Strengthen understanding of the Nevada State Public Charter School Authority expectations

The transition from Clark County School District to sponsorship by the Nevada State Public Charter School Authority (SPCSA) presents Odyssey Charter School with a valuable opportunity to align more closely with statewide charter school expectations. 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 and policies.

Participation in SPCSA trainings

It is recommended that leadership at Odyssey Charter School actively participate in monthly professional development sessions, including those focused on Canvas, technology tools, and other instructional supports. Staff should regularly view [asynchronous training modules](#) available on Canvas⁶ to reinforce learning and stay updated on key systems and practices.

Improve high school math proficiency

To support improved math proficiency at the high school level, one suggestion is that the school increase opportunities for students to take an active role in their learning. During the site evaluation, the SPCSA team observed that not all students were fully engaged or participating in rigorous problem-solving. Enhancing lessons to ensure more students are doing the cognitive heavy lifting, such as justifying their reasoning, collaborating on complex tasks, and engaging in mathematical discourse, can promote deeper understanding and higher achievement in math. Some possible suggestions include:

- Intentionally planning math discourse opportunities
- Selecting math tasks that promote deep thinking
- Implementing accountable talk strategies
- Grouping students strategically
- Inside- Outside Circles⁸
- Using manipulatives

Increase student engagement

Another recommendation for Odyssey Charter School is to continue increasing student engagement and adding more student-led learning opportunities. One potential idea to increase student engagement is the implementation of extended discourse through Kagan⁹ instructional strategies. This approach

⁸ Inside- Outside Circles is a cooperative learning strategy that allows students to work with multiple partners.

⁹ Kagan instructional strategies are designed to promote cooperation and communication in the classroom, boost students' confidence, and retain their interest in classroom interaction.

encourages students to take a more active role in their learning, which is closely tied to promoting deeper student discussions. Effective student discourse involves interactive dialogue that externalizes thinking and focuses on making meaning from the learning experience. Student discourse can include making arguments, explaining concepts, critiquing ideas, and using logic and evidence to support or challenge claims.

Deeper collaboration across grade levels

It is recommended that Odyssey Charter School strengthen collaboration between the elementary, middle, and high school teams to better support student success across all grade levels. Some possible suggestions include cross-grade team meetings, joint professional development sessions, and shared intervention planning to help establish regular, structured opportunities for vertical alignment, which can better support students' learning process.

Consider a board member with law experience

Another recommendation is that Odyssey Charter School's Board consider adding a member with a background in law. Adding a board member with legal expertise would strengthen the board's ability to navigate compliance matters, contracts, and governance-related decisions.

Site Evaluation Findings: Strong Recommendations

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

There are no strong recommendations for Odyssey Charter School during this site evaluation.

Site Evaluation Findings: Deficiencies

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

There are no deficiencies for Odyssey Charter School 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 ¹⁰	3
Family Members, Parents, and Guardians	9
Faculty and Staff	11
School Leadership	10
Students	11

¹⁰ Quorum was not met, and Open Meeting Law was not violated.

Focus Group Summary: Governing Board

Three members of the Odyssey Charter School Board participated in the focus group session. As explained by the focus group participants, the backgrounds of the governing board members include finance, education, business, school administration, and a parent. The board meets once quarterly. They reported receiving board training, and there are no open seats. The board has a finance sub-committee.

The school's governing board has engaged in a wide range of initiatives aimed at improving both operational and academic outcomes. Recent efforts include a comprehensive review of all policies and procedures, with particular attention given to areas such as dual credit opportunities and teacher retention. The board has explored creative staffing solutions, including the potential use of retired educators, and has discussed facility improvements to address remodeling needs. Financial stability remains a top priority, with board members closely monitoring the school's lease agreements, maintaining healthy cash reserves, and ensuring a balanced budget with strong financial forecasting.

Board members expressed confidence in the school's fiscal health, noting that performance benchmarks are being exceeded and that enrollment and financial indicators are among the highest of all charter schools. One board member stated, "The addition of student clubs is a positive development for school culture and engagement." The transition from the Clark County School District to the SPCSA oversight was described as favorable, providing greater alignment and support for the school's goals.

Board members shared several recent successes at Odyssey Charter School, beginning with the celebration of the school's 26th anniversary, marking the years of service to the community. "Graduation ceremonies are significant events. They showcase the school's diverse student body and the accomplishments of its learners," one board member mentioned. Board members credited these successes to a schoolwide culture that is deeply student-centered. They emphasized that every member of the organization, from leadership to instructional staff to support personnel, remains focused on meeting the needs of students by putting them first.

One challenge identified by the board is that Odyssey Charter School has outgrown its current facility. Board members noted that the school reaches full capacity every year and consistently maintains a waiting list. While the school strives to accommodate all interested families, space limitations remain a growing concern as demand for enrollment continues to exceed available capacity.

Board members described the school leadership as humble, mindful, and deeply student-focused. They noted that school leaders consistently prioritize what is best for students and approach their roles with a strong sense of purpose and humility. According to the board, this leadership style fosters a positive, mission-aligned culture where decisions are made thoughtfully and in service of student success.

Focus Group Summary: Family Members, Parents, and Guardians

During the site evaluation at Odyssey Charter School, nine parents participated in the parent focus group and shared numerous success stories highlighting the school's positive impact on their children. Parents described the school as a place where students are deeply supported and empowered to learn in ways that align with their individual needs. One parent shared that her daughter, who has learning difficulties, receives significant one-on-one support from her teachers. As a result, she has gained confidence, learned to take her time, and is now thriving academically. Another parent said, "There is a human-centered approach by the staff. The teachers, counselors, and leaders consistently prioritize students' well-being. The school counselor genuinely loves the students." Parents also praised Odyssey Charter School for allowing students to follow their own academic paths. For example, one parent shared that her child has been able to move at his own pace since first grade and is not held back by traditional classroom pacing. She said, "His motivation has flourished under this model. In a particularly meaningful project, he collaborated with an elementary school aide to write and publish a book by writing the story and the aide provided the illustrations. The book now resides in the school library."

Parents shared that their children are actively engaged in a variety of extracurricular opportunities offered by Odyssey Charter School. One parent noted that their son enjoys attending school so much that he often chooses to come on Fridays, which are club days, and is on campus four days a week, even though the school is mainly an online platform. Another parent shared, "My daughter recently joined both the student council and the drama club and is already looking forward to participating in STEM and debate clubs in middle and high school." Yet another parent shared that her daughter's involvement in drama has boosted her confidence, especially when performing on stage. Students recently participated in two productions, including *Newsies*, which provided a meaningful opportunity for creative expression and personal growth.

Parents expressed that communication from teachers and school administration is clear, consistent, and supportive. Most commonly, families receive updates through text messages and emails, with staff taking an approachable tone focused on partnership, which is often framed around the question, "What can we do to help your child?"

Parents shared some suggestions to enhance the overall experience at Odyssey Charter School for families and students. Common recommendations included improving parking and expanding extracurricular offerings to include additional clubs such as choir and sports. Some parents also suggested creating a designated lounge or indoor waiting area where families can sit comfortably while waiting for their students to complete their instruction.

Focus Group Summary: Faculty and Staff

During the site evaluation, staff members shared several aspects they appreciated most about teaching at Odyssey Charter School. A recurring theme was the benefit of a low student-to-teacher ratio, which allows educators to meet individual student needs more effectively. Teachers expressed deep satisfaction with the strong sense of community, noting that long-term relationships with families, create a warm and connected school environment. A staff member claimed, “I love the value of one-on-one feedback opportunities with students and the consistent support I receive from school leadership.”

Odyssey Charter School has been successful in achieving high Nevada School Performance Framework¹¹ (NSPF) scores within an online learning environment, particularly at the elementary and middle school levels. When asked what distinguishes their model from other online schools that have struggled, staff emphasized a strong system of in-person engagement and wraparound support. They added that students are required to attend in person at least one day per week. For high school students in need of extra support, the "Red Alert" system identifies those who should attend a second day for additional help. At the elementary level, weekly on-campus attendance is also expected, and families benefit from direct support provided by interventionists, social workers, administrators, and other support staff.

Teachers at the school shared that data plays a critical role in guiding instructional decisions across grade levels. In the elementary grades, Measures of Academic Performance¹² (MAP) assessment scores are used as a primary tool to identify students in need of additional support. In the upper grades, including high school, educators incorporate data from MAP scores as well as classroom-based summative assessments to monitor progress and ensure students are performing at or above grade level.

Teachers described the school’s climate and culture as deeply student-centered, setting it apart from other schools where they have previously worked. Many staff members have been with the school for several years and expressed a strong sense of commitment to both their work and the students they serve. One teacher emphasized, “Students are truly valued, and administration is flexible and supportive which contributes to a positive working environment.”

Teachers offered several suggestions to enhance collaboration and community at the school. One key recommendation was to create opportunities for vertical alignment meetings among elementary, middle, and high school teachers to better support continuity in instruction and expectations across grade levels. One staff member expressed, “I would like to see more community-building events for families outside of the school day, like outings to the park or bowling night. They will help strengthen relationships and foster a sense of connection beyond the classroom.”

¹¹ NSPF is Nevada’s public school rating system designed by Nevadans and developed in accordance with the federal Every Student Succeeds Act (ESSA) per NRS 385A.600 and classifies schools within a five-star performance rating system.

¹² Measures of Academic Progress (MAP) is a computer-adaptive assessment utilized to monitor student growth to inform and personalize instruction. MAP was officially adopted by the State Board of Education to assess Nevada students as a part of the Read by Grade Three (RBG3) program.

Focus Group Summary: School Leadership

During the focus group, ten leaders from Odyssey Charter School shared insights into how the school consistently earns four- and five-star ratings in its elementary and middle school programs. A key distinction they emphasized is the difference between simply managing an online course and truly providing high-quality instruction in an online learning environment. They emphasized that at Odyssey, teachers are not just facilitators; they are central to the instructional process. One leader shared, “The expectation is that students are active participants in their learning, and this philosophy extends from highly qualified, fully credentialed teachers to dedicated teacher assistants who are fully equipped to support student success.”

Leaders shared that another defining feature of the Odyssey Charter School’s culture is the removal of barriers to access, noting that there are no charges for summer school, field trips, CTE¹³ classes, dances, Advanced Placement¹⁴ (AP) courses, dual credit opportunities, or clubs. Additionally, the school does not require fundraising from families and provides wrap-around services, such as free bus passes to ensure transportation, and a dentist who visits the campus for students.

School leaders acknowledged that high school math proficiency currently stands at 11% and shared a variety of new and ongoing strategies being implemented to address this challenge. A key addition this year is the introduction of a dedicated math enrichment program. In conjunction with this, the school has launched ACT boot camps and is working to incorporate ACT-style questions directly into classroom instruction, using an early morning schedule to provide targeted support and increase student exposure to test-aligned content.

It was reported by school leaders that one of Odyssey Charter School’s unique strengths is its commitment to individualized professional development for all teachers. Odyssey has one full-time Director of Professional Development. Professional learning is tailored to each educator’s needs and is grounded in a research-based instructional framework influenced by John Hattie’s¹⁵ work.

School leaders reported a strong staff retention rate of 97.5%, which they attribute to a supportive culture, clear communication, and visible leadership. All three principals in the elementary, middle, and high schools shared that they prioritize being present in classrooms regularly, especially after professional development sessions. Following training, leaders intentionally visit classrooms to celebrate teacher growth and reinforce positive instructional practices.

¹³ CTE, or Career-focused experiential learning programs, sometimes called Career- Focused Experiential Learning Programs, provide students with opportunities to explore careers and gain marketable skills while still in high school.

¹⁴ Advanced placement scores are ranked from two through five. A score of three means qualified, four very well qualified, and five extremely well qualified. Colleges or universities may grant credits or waive prerequisites for more advanced courses based on AP scores. It is up to each college or university to set their policy, but generally a score of three or higher will earn credits or prerequisites waived.

¹⁵ John Hattie created great interest in 2008 when he published the book *Visible Learning*. In the text, he compares the statistical measure of effect size to the impact of various influences on students' achievement, such as class size, feedback, and learning strategies, making learning strategies more measurable.

Focus Group Summary: Students

During the focus group, eleven students at Odyssey Charter School reflected on their favorite aspects of the school. Many shared that they value the flexibility Odyssey offers. One student expressed appreciation for being able to travel and compete in basketball while staying current with schoolwork and avoiding absences. Another student noted that the school provides the benefits of individualized, homeschool-style learning along with opportunities for social interaction and events. A high school student shared that the self-paced structure mirrors college expectations and is helping them prepare for future academic success. One student remarked, “It’s a big family. I’ve found a lot of people who are like me and have made many friends.”

When asked if they feel safe at school, students in the focus group overwhelmingly responded that they do. They shared that the small campus size contributes to a sense of security, as it allows staff to be more aware of student whereabouts and activity. One student noted that “teachers know where you should be,” and mentioned that there are always two or three staff members monitoring the parking lot, paying close attention to who is on campus. Students also appreciated the secure building access procedures, highlighting that individuals must show ID and be let in, which helps prevent unauthorized entry. When asked if they had a trusted adult on campus to whom they could go if a problem arose, the majority of students said yes, indicating strong relationships and support systems within the school community.

When asked about challenges that get in the way of their learning, students at Odyssey Charter School shared a variety of thoughtful responses. A common theme was the difficulty of managing time effectively in a flexible, self-paced environment. Some students noted that while they appreciate having the time needed to produce high-quality work, this can make it harder to adapt to timed assessments, such as the Scholastic Assessment Test¹⁶ (SAT) or ACT, where quick thinking and pacing are essential. One student mentioned, “Sometimes I struggle finding a quiet, consistent place to study and stay focused.”

Students shared several thoughtful ideas to enhance their experience at Odyssey Charter School. A common suggestion was the creation of a dedicated social space, similar to the school lab but designed for students to relax and connect with friends. Other suggestions focused on increasing social interaction and support services. One student suggested, “I would like to build stronger connections with other schools through inter-school clubs, such as speech and debate, and participating in state-level competitions.” There was also a desire for more sports opportunities. More recommendations included creating a designated lunch area, offering food bags for students in need, and having a dedicated college counselor.

¹⁶ The SAT is typically taken by high school juniors and seniors. The College Board states that the SAT is intended to measure literacy, numeracy and writing skills that are needed for academic success in college.

Classroom Environment and Instruction

Observation Rubric

A total of 10 elementary, 12 middle, and 13 high school classrooms were observed in person and online 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: 7	TOTAL: 20	TOTAL: 1	TOTAL: 0	TOTAL: 7
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: 5	TOTAL: 26	TOTAL: 1	TOTAL: 0	TOTAL: 3

Classroom Environment and Instruction Observation Rubric

A total of 10 elementary, 12 middle, and 13 high school classrooms were observed in person and online 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 explains content clearly and imaginatively. The teacher invites students to explain the content to their classmates. Students use academic language correctly.	The teacher states clearly, at some point during the lesson, what the students will be learning. The teacher's explanation of content is clear and invites student participation and thinking. The teacher makes no content errors. Students engage in the learning task, indicating that they understand what they are to do.	The teacher provides little elaboration or explanation about what students will be learning. The teacher's explanation of the content consists of a monologue, with minimal participation or intellectual engagement by students. The teacher may make minor content errors. The teacher must clarify the learning task.	At no time during the lesson does the teacher convey to students what they will be learning. Students indicate through body language or questions that they don't understand the content being presented. Students indicate through their questions that they are confused about the learning task.	This criterion was not observed or rated.
	TOTAL: 6	TOTAL: 28	TOTAL: 0	TOTAL: 0	TOTAL: 1
Using Questioning and Discussion Strategies	Students initiate higher-order questions. The teacher builds on and uses student responses to questions to deepen student understanding. Students extend the discussion, enriching it. Virtually all students are engaged.	The teacher uses open-ended questions, inviting students to think and/or offer multiple possible answers. Discussions enable students to talk to one another without ongoing mediation by the teacher. Many students actively engage in the discussion.	The teacher frames some questions designed to promote student thinking, but many have a single correct answer. The teacher invites students to respond directly to one another's ideas, but few students respond. The teacher calls on many students, but only a small number participate.	Questions are rapid-fire and convergent with a single correct answer. The teacher does not ask students to explain their thinking. Only a few students dominate the discussion.	This criterion was not observed or rated.
	TOTAL: 2	TOTAL: 20	TOTAL: 5	TOTAL: 0	TOTAL: 8

Classroom Environment and Instruction

Observation Rubric

A total of 10 elementary, 12 middle, and 13 high school classrooms were observed in person and online 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: 7	TOTAL: 20	TOTAL: 5	TOTAL: 0	TOTAL: 3
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: 2	TOTAL: 30	TOTAL: 1	TOTAL: 0	TOTAL: 2

Classroom Observations and Additional Comments

In one high school math class, there were thirteen students, one teacher, and two other adults. Students received one-on-one support while solving math equations. One adult was speaking Spanish to explain something to a student. As students got "stuck," there was an adult to ask them questions and guide them through the problem-solving. Students were highly engaged, and rigorous thinking was happening.

In an asynchronous online lesson, the teacher provided a review on identifying the theme of a text. Students were instructed to collaborate with a parent to determine the theme of a short passage, "The Pitcher and the Crow," by selecting the correct answer from multiple-choice options. Following this, students read a longer, grade-level appropriate passage about jury duty and were again asked to identify the theme. The assignment was presented in a clear and structured manner.

In a 7th-grade online asynchronous class, the teacher presented a short video to introduce the week's math objective, which focused on adding and subtracting mixed numbers involving fractions. The teacher also reviewed information on setting up students' math notebooks and the expectation of completing their attendance check-in for all six classes. The video concluded with the teacher emphasizing her office hours and the importance of communicating with her regarding assignments or concerns that students may need help with.

In a middle school math course, the learning objective was clearly stated, and a brief instructional video on real-world applications of integers was shown. Following the video, students completed a five-question quiz on the topic, receiving immediate feedback on the accuracy of their responses. A resource page, along with the teacher's office hours, was also provided to ensure students know how to access additional support if needed.

In a 12th-grade online blended learning English Language Arts classroom, the teacher presented a short video to review the procedures and explanations of posting on their classroom's discussion board. The module noted how to post, scoring guidelines, and ground rules. The teacher also provided a prompt, which was to reference and review the chart displayed. It was proposed, "If you had to choose any color crayon to represent your personality or who you are as a person, which would you choose, and why do you think that color represents you?" Additionally, the teacher demonstrated how to post and reply to peers, emphasizing the importance of engaging with them.

In an online math course, the teacher shared a recorded video in which he reviewed the skills students would be learning that week. He offered encouraging words and reminded students to make a first attempt on the assignment before seeking his assistance.

Students in one middle school math class were more compliant than engaged. It seemed like they sat and listened and filled out the paper, but there could be a better use of open-ended questions and student discussion to engage students.

Students in a face-to-face primary classroom were drawing pictures to represent the quantities of objects displayed. They worked efficiently and with focus.

Approximately 18 high school students worked independently on desktops and laptops to access their learning platforms. There were three adults in the room assisting students. Students worked on a range of assignments, including math, writing, science, and social studies. For instance, a student engaged in completing an analysis chart of library devices and their impact, while another student worked on a biodiversity assignment. The classroom environment was highly conducive to learning and included a portion where the teacher checked in with students to discuss their progress.

The teacher engaged elementary students in a discussion about the commutative, associative, identity, and zero properties of numbers by calling on individuals to share their ideas. The teacher provided examples of each property and explained them in detail to the class. Although the explanation was explicit, it lacked student input. Following the discussion, students completed an individual quiz to assess their understanding of the material.

Five teachers provided individualized help to nine students in the school's classroom known as The Lab. The range of assignments included solving algebraic equations, learning about the history and facts of the Buddha, and completing written responses regarding the eight amendments, among others. Students were observed taking the initiative in their own learning and displayed high levels of commitment to their assignments.

In an upper elementary classroom, students were independently reading an article titled "Lost and Found" and writing a summary using key details. Before transitioning to math, they were encouraged to take a short break. A timer was set on the board to ensure a tight transition. The teacher then began the math lesson with a review of previously taught skills, having students solve problems on individual whiteboards. Peer discussion was encouraged as students shared and compared their answers. The teacher prompted deeper thinking by asking questions such as, "What does the exponent in this problem mean?"

The teacher in one primary classroom provided clear and explicit instructions on how to rotate through the various classroom centers. The centers included a math game, STEM¹⁷ Bins, word work, and the library. While students engaged in their center activities, the teacher conducted individual math assessments. She asked each student, "I have five cubes. I am going to show you some and hide some. Tell me how many are hidden," repeating similar questions with each student. The classroom operated smoothly and efficiently.

¹⁷ STEM represents an interdisciplinary approach that integrates these subjects to prepare students for future careers. It emphasizes real-world applications and problem-solving skills, aiming to create a workforce adept in these critical areas. STEM education is hands-on, often project-based, and encourages meaningful, practical learning experiences.

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.

Odyssey Charter School is new to the SPCSA portfolio as of the 2025-2026 school year. Therefore, the information below is not applicable

Prior Recommendation by Site Evaluation Team	School Assessment of Progress	SPCSA Staff Assessment of Progress
Not applicable	Not applicable	Not applicable

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

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.

Part 2

Odyssey Charter School

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	Odyssey Charter School 2251 S. Jones Blvd, Las Vegas, NV 89145
Financial Period or Fiscal Years/ School Years Covered	07/01/2024 – 06/30/2025
Date(s) and time(s) of Monitoring	Wednesday, September 24, 2025 8:00AM - 12:00 PM
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

Risk Based Monitoring: (2) School Overview

- Total Number of Students: 2397
- Grade Levels: K - 12
- Grants with Active Subawards:
 - FY26 Special Education (IDEA, Part B)
 - FY26 Title I, Part A
- Grants with Allocations (subaward pending):
 - 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 staff at Odyssey Charter School were very friendly and welcoming, providing an engaging and transparent environment while promptly answering any questions posed by the SPCSA.
- Odyssey Charter School continues to develop a team to ensure the appropriate use and management of grant funds. The school is in the process of defining clear roles and responsibilities among school staff, the board, and external partners involved in education grants. Odyssey Charter School shared a draft of its current policies and procedures with SPCSA staff, as requested. The school is working to develop and implement business processes at the campus and charter levels for effective and compliant grant management. They are committed to making the necessary changes to campus policies, procedures, and core processes to ensure compliant and effective grant management practices.
- Odyssey Charter School staff and fiscal partners are committed to using funds to improve student academic outcomes. The school intends to use grant funds to maximize benefits for students.

Monitoring Area: Special Education- Program

- The leadership team at Odyssey Charter School was accommodating and demonstrated a strong commitment to the school's success through the way they answered questions. The school principal and federal programs director expressed immense pride when speaking about the school, the staff, and their support programs for all students. The training materials they shared reflected the school's dedication to reaching all types of learners and providing learning supports for students both in person and online.
- They also elaborated on how Odyssey Charter School offers students Community-Based Instruction, which provides opportunities to prepare for post-school living, independent living, and vocational skills. Additionally, Odyssey Charter School employs three social workers and a post-secondary transition specialist to support students beyond academics.
- During the special education monitoring block, the required documents were readily accessible, and the school principal and federal programs director were prepared to provide additional information regarding program implementation. A randomly selected student file was reviewed and found to be well-organized, with documentation that was generally compliant. Staff were receptive to feedback.

Monitoring Area: Title IA - Program

- Odyssey Charter School is new to the SPCSA portfolio and is actively working to complete Epicenter tasks. The school is utilizing Title IA funding to enhance student access to technology and to support the hiring of an interventionist who will provide tiered academic and behavioral supports to students.

Monitoring Area: Title II – Program

- At the time of the visit, Odyssey did not receive Title II funding.

Monitoring Area: Title III – Program

- At the time of the visit, Odyssey did not receive Title II funding.

Monitoring Area: Title IV – Program

- At the time of the visit, Odyssey did not receive Title II funding.

Monitoring Area: Additional Areas: McKinney Vento and Foster Care

- Odyssey is in the process of completing its McKinney-Vento (MKV) and Foster Care (FC) Epicenter tasks. The school provides several supports to MKV and FC students, including bus passes and other essential resources.

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:

1. Continue to strengthen the specificity of applicable personnel performing grant-related fiscal administration roles and responsibilities.
2. Include further details in written policies and procedures to ensure the *how*, *who*, and *when* are thoroughly documented. Procedures should be clearly tied to policies. Making this relationship explicit—and explaining how each procedure supports the school's goals and strategic plans—helps ensure both understanding and compliance. The SPCSA has fiscal “Policy and Procedures” guides available on the Risk Based Monitoring Canvas portal that may assist:
<https://spcsa.instructure.com/courses/75>.
3. Detailed, step-by-step procedures should be written so that tasks can be easily followed by all users, including both tenured and new school personnel, as well as contracted staff. This will help protect business processes and maintain internal controls in the event of staff turnover or the expansion of grant programs. Additionally, detailed processes and procedures can be leveraged to develop internal training documentation and should be evaluated annually by fiscal staff to identify and refine process gaps, improving efficiency and effectiveness.
4. 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 those funds. Financial and programmatic reporting provides key information about the overall financial status and program performance of the grant. These reporting requirements are outlined in the authorizing statutes and regulations for each grant program accepted by the charter school upon execution of the grant award. A list of known federal and state fiscal Epicenter reporting requirements is available in the SPCSA's Grants Administration Repository, along with the anticipated due dates: [Fiscal Epicenter Reporting Requirements](#)
5. 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 with federal regulations. Recommended organizations include:
 - Brustein and Manasevit,
 - National Association of Federal Education Program Administrators (NAFEPA)
 - National Grants Management Association (NGMA).
6. Requested documentation requirements for Salary/Benefits Reimbursement Requests are outlined below. A list of all object codes can be found here: [SPCSA Grants Administration Canvas Training Modules](#)

- [OC100 - Salaries](#)
- [OC200 - Benefits](#)

7. Suggestions for Allowability of Costs:

- *Criteria Reference: School Self Evaluation Checklist - Allowability of Costs #5 (Time and Effort):* Continue to develop procedures around types of time and effort reports (e.g., PAR vs. semi-annual blanket certifications) required based on the FTE staff funded at the school (note: contractors are exempt). All employees paid in full or in part with federal funds must submit records demonstrating the amount of time spent on grant activities.
 - [Time and Effort - Canvas Training](#)
- *Criteria Reference: School Self Evaluation Checklist - Allowability of Costs #6 (Travel Policy):* Expand procedures to align with the types of travel documentation required for reimbursement requests. In addition to receipts, travelers may also be required to submit items such as a copy of a conference or training agenda.
 - [SPCSA Charter School Travel Request Form \(Compliant\)](#)
 - [OC580 Travel RR Documentation Requirements](#)
- *FY27 New Policies:* Review and incorporate the two (2) new Fringe Benefits and Health and Welfare policies and procedures, which will be *required* starting in FY27 (2026-2027 school year). Sample policies and procedure guides are available in the SPCSA's Risk Based Monitoring Canvas repository:
 - [Health and Welfare P&P](#)
 - [Fringe Benefits P&P](#)
 - [Canvas Repository - Risk Based Monitoring Modules](#)

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 demonstrate progress.
- The SPCSA recommends a consistent practice of 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 more measurable achievement/progress 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 to Infinite Campus.
- Discuss appropriate transition services at the next annual IEP review for students aged 14 years and older. Review the required information for the PWN, PLAAFP, and the transition area of the student's IEP.
- Strengthen staff capacity through ongoing training and oversight on special education policies, procedures, and practices, while ensuring participation in SPCSA training opportunities.
- Ensure that 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

- It is recommended that Odyssey continue to meet compliance deadlines in a timely and consistent manner.

Monitoring Area: Title II – Program

- It is recommended that Odyssey continue to meet compliance deadlines in a timely and consistent manner.

Monitoring Area: Title III – Program

- It is recommended that Odyssey continue to meet compliance deadlines in a timely and consistent manner.

Monitoring Area: Title IV – Program

- It is recommended that Odyssey continue to meet compliance deadlines in a timely and consistent manner.

Monitoring Area: Additional Areas: McKinney Vento and Foster Care

- It is recommended that Odyssey continue to meet compliance deadlines in a timely and consistent manner.

Risk Based Monitoring: (4.3) New School Support Plan

Any issues identified below require an improvement plan. The information 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:

1. Internal Controls
2. Allowability of Costs
3. Accounting & Financial Management Systems
4. Procurement Systems
5. Audit Resolution
6. Inventory Management
7. Records Retention

- **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/CMOs is not sufficiently documented in the school's written policies and procedures to meet compliance with the Uniform Guidance.

Additionally, documented financial management practices do not adhere to applicable laws and regulations and/or fail to follow the Generally Accepted Accounting Principles (GAAP) and Generally Accepted Government Auditing Standards (GAGAS).

- **Effect of Deficiency:**

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

Improper or insufficient internal controls may also lead to the potential loss, theft, or misuse of funds.

- **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 present within each policy. Complete and submit the following to the SPCSA:

- *Criteria Reference: Internal Controls School Self Evaluation Form item #3*
 - Overall comment: Please remove outdated references to the Clark County School District (CCSD) and/or other outdated information, such as ESSER/COVID-19 awarded grants.

Develop appropriate written policies and procedures, document business processes for grants, and ensure that all required internal controls are included in each policy. Submit the below completed documents to the SPCSA:

- *Criteria Reference: School Self Evaluation Checklist – Internal Controls #3 and #4 (Segregation of Duties and Generally Accepted Accounting Principles):* Remove outdated references to the Clark County School District (CCSD) and/or other outdated information such as ESSER/COVID-19 awarded grants, found throughout the document.

Monitoring Area: Allowability of Costs

- **Issues Identified:**

- **Conditions Found Not in Compliance:**

- The written allowability policies and procedures are not fully compliant with the Uniform Guidance.

- **Cause of Deficiency:**

- The charter school's written policies and procedures do not sufficiently address how allowability will be determined throughout the grant management process.

- **Effect of Deficiency:**

- A lack of, or insufficient, internal controls within the school's written policies and procedures for determining allowability may lead to the misuse of funds. Obligated costs and expenditures may not be reasonable, necessary, or allocable to federal awards and may be deemed unallowable. As a result, funds may need to be repaid to the federal government, potentially causing financial strain.

- **Criteria Used**

- 2 CFR 200.303 (b)(7)
 - 20 U.S.C. § 6321(b)(1); (Note: SNS rule generally depends on the specific federal program- for example 34 CFR 200.79 for TIA)
 - 2 CFR 200.437
 - 2 CFR 200.431

- **Improvement Plan:**

- Policies and procedures should address all required Uniform Guidance requirements. They should also clearly outline how and when allowability will be determined throughout the grant management process, who is responsible for determining allowability and approving or authorizing costs, and what records will be retained to demonstrate that allowability determinations were made for all award-funded costs. Complete and submit the following to the SPCSA:

- *Criteria Reference: School Self Evaluation Checklist - Allowability of Costs #4 (Supplement, Not Supplant - SNS)*
 - While a reference is made under the *Grant Administration Procedures – Controls Over Grant and Federal Expenditures Section* it is not explicitly stated. Add a direct statement that Odyssey Charter School adheres to SNS federal regulations for federal funding and include a definition of “Supplanting.” See *Support and Resources* for guidance.

- *FY27 New Policies and Procedures* – these are required for the 2026-2027 school year. It is recommended to incorporate them now. Refer to Section 4.2 *Areas of Improvements/Recommendations*.
- Refer to Section 4.2 *Areas of Improvements/Recommendations* for strong suggestions regarding the *Travel Policy* and *Time & Effort* documentation.

Monitoring Area: Program: Fiscal: Accounting and Financial Management

• 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 school's standardized fiscal management policies and procedures for conducting and supporting key fiscal management processes and accounting activities are not sufficiently documented to fully meet Uniform Guidance compliance requirements.

• Effect of Deficiency:

Current business processes may not fully comply with the Uniform Guidance. This could lead to inadequate internal controls over fiscal management and accounting processes, such as grant tracking and management, grant reconciliations, procurement, reimbursement requests, and/or cash management procedures.

• Criteria Used

- 2 CFR §200.302;
 - 200.302(b);
- 2 CFR 200.302 (b)(1)
 - §200.328

• 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 and procedures related to grant tracking, fiscal and accounting management, grant reconciliations, procurement, reimbursement requests, and cash management. Complete and submit yje following to the SPCSA:

- *Criteria Reference: Accounting and Financial Management System School Self Evaluation Form item #3 & #5*
 - The SPCSA could not identify the required financial management system identification components within the current policies and procedures.
 - The following seven (7) components must be embedded into accounting record and coding procedures and demonstrate timely processing:
 1. Include identification for all federal awards, citing the following within policies and procedures and the Grant Tracking System:
 - a. Assisted Listing Number (ALN)
 - b. Federal Award Identification Number (FAIN)
 - c. Year the federal award was issued

- d. Name of the pass-through agency
 - e. Must be recorded in the NV State Chart of Accounts (COA)
See Sample Grant Tracker in Support and Resources.
2. Accurate, current, and complete disclosure of the financial results of each Federal award or program
 3. Maintenance of records that sufficiently identify the amount, source, and expenditure of federal funds. These records must include identification of federal awards, authorizations, financial obligations, unobligated balances, assets, expenditures, income, and interest. All records must be supported by source documentation.
 4. Effective control over and accountability for all funds, property, and assets.
 5. Comparison of expenditures with budget amounts for each federal award.
 6. Written procedures to implement requirements related to payments.
 7. Written procedures for determining the allowability of costs in accordance with the terms and conditions of the federal award.

Monitoring Area: Program: Fiscal: Procurement Systems

- **Issues Identified:**

- **Conditions Found Not in Compliance:**

The written procurement policies and procedures are not fully compliant with Uniform Guidance.

- **Cause of Deficiency:**

Documented procurement procedures for informal, formal, and noncompetitive procurement methods are either absent or not sufficiently addressed within the school's policies and procedures to meet compliance.

- **Effect of Deficiency:**

The use of informal procurement methods without proper documentation or justification may lead to legal or regulatory concerns. This highlights the importance of adopting a balanced approach that considers various procurement methods to achieve better outcomes and effectively meet the school's needs.

- **Criteria Used**

- 2 CFR §200.318;
 - §200.319;
 - §200.320;
 - §200.321;
 - §200.322

- **Improvement Plan:**

Develop compliant written policies and procedures. Relevant staff should become familiar with these documented processes, and responsible staff must clearly understand their roles and responsibilities. The policies and procedures must outline how the school will conduct procurement activities related to administering contracts with responsible vendors or contractors.

This includes a review process for suspension and debarment through SAM.gov and specification of the records will be retained to demonstrate that vendor/service procurement was conducted appropriately. The procedures should be detailed enough to serve as standard operating procedures for internal staff training. Complete and submit the following to the SPCSA:

- *Criteria Reference: School Self Evaluation Checklist – Procurement Systems #5*
 - Minimum standards are currently met by reference only. Add a section that fully outlines the methods used to evaluate and secure contractors (e.g., evaluation rubrics, systems for informal, formal, and noncompetitive procurement processes).
 - Schools must maintain records sufficient to detail the history of each procurement transaction. These records must include the rationale for the procurement method, the selection of contract type, the basis for contractor selection or rejection, and the basis for the contract price:
 - *Informal Procurement Methods:*
 - Micro-purchases ($\leq$ \$10,000)
 - Small purchases ($>$ \$10,000 and $<$ \$250,000)
 - *Formal Procurement Methods:*
 - Purchases exceeding \$250,000 (e.g., sealed bids)
 - *Noncompetitive Procurement Methods:*
 - Single/sole source
 - Public emergency
 - Authorization from SPCSA or passthrough agency

These procedures must align with 2 C.F.R. Part 200 – Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards, and should be detailed enough to serve as standard operating procedures for internal staff training.

Monitoring Area: Program: Fiscal: Audit Resolution

- **Issues Identified:**
 - **Conditions Found Not in Compliance:**

The written audit policies and procedures are not fully compliant with the Uniform Guidance.
 - **Cause of Deficiency:**

The school's standardized audit policies and procedures for conducting and supporting key audit processes (e.g., audit preparation, audit completion, and cooperative resolution of audit findings) are not sufficiently documented to fully meet Uniform Guidance compliance requirements..
 - **Effect of Deficiency:**

Current business processes may not fully comply with Uniform Guidance. This could lead to inadequate internal controls over critical grant management activities, such as audit resolution, reconciliation of deficiencies, financial record-keeping for grant

budgets, proper tracking of federal funds, and ensuring the accuracy of the Schedule of Expenditures of Federal Awards (SEFA) through review and approval.

- **Criteria Used**

- 2 CFR Subpart F §200.501;
 - §200.507(c)(1); 2 CFR 200.512
- 2 CFR Subpart F §200.510
-

- **Improvement Plan:**

Develop compliant written policies and procedures outlining how the school will manage and control inventory to ensure safeguards are in place to prevent property loss, damage, or theft. Any loss, damage, or theft of equipment must be investigated. These procedures should be detailed enough to serve as standard operating procedures for internal staff training. Complete and submit the following to the SPCSA:

- *Criteria Reference: School Self Evaluation Checklist – Inventory Management #4*
 - Some requirements are listed in the Capital Asset section of Odyssey's policies and procedures, but not all.
 - To align with Uniform Guidance, incorporate the following twelve (12) inventory management components:
 1. Description of inventory
 2. Serial number
 3. Acquisition date of purchase
 4. Federal funding source
 5. Assisted Listing Number (ALN)
 6. Federal Award Identification Number (FAIN)
 7. Unit cost
 8. Title holder
 9. Percent of federal participation
 10. Location/room number
 11. Use and condition
 12. Disposition information (including for lost or stolen equipment)

Monitoring Area: Program: Records Retention

- **Issues Identified:**

- **Conditions Found Not in Compliance:**

The written record retention policies and procedures are not fully compliant with the Uniform Guidance.

- **Cause of Deficiency:**

The charter school's written policies and procedures are either absent or do not sufficiently address the record retention related processes required for federal grant awards.

- **Effect of Deficiency:**
Current business processes conflict with the requirements under the Uniform Guidance. As a result, the school may be required to repay funds if records are unavailable
- **Criteria Used**
 - 2 C.F.R. §200.334
 - 2 C.F.R. §200.337-338;
 - §200.303(e)
- **Improvement Plan:**
The school's written Records Retention policy and procedures must include the required internal controls to demonstrate that reasonable measures are in place to provide the necessary protections and safeguards mandated by federal regulations and privacy laws.
- *Criteria Reference: School Self Evaluation Checklist – Record Retention #4*
 - Odyssey indicated it will adopt the SPCSA's retention schedule as of 7/2/2025. Per the Uniform Grant Guidance (UGG), all education grant fiscal and program-related records must be retained for a minimum of three (3) years to comply with the Uniform Guidance and the General Education Provisions Act (GEPA).
 - SPCSA also recommends retaining all grant-related records for at least three (3) years to account for the False Claims Act and any ongoing audits or monitoring activities. A total retention period of six (6) years is recommended and should be reflected in the updated policy.
- *Criteria Reference: School Self Evaluation Checklist – Record Retention #6*

Further detail is needed in the procedures regarding how assets purchased with grant funds and sensitive information related to grant performance will be secured and protected. The revised policy should include who is responsible for these procedures and how frequently they are performed. For clarity, examples may include identifying who has access to locked cabinets, whether records are stored online, and what cybersecurity measures are in place.

Monitoring Area: Program: Special Education

- **Issues Identified:**
 - **Conditions Found Not in Compliance:**
There were no clear Effects statements (third column of PLAAFPs) for areas not identified as deficient. Instead of documenting how or if the student's disability affects their involvement and progress, staff defaulted to a blanket phrase ("No Effects Statement Needed").
 - **Cause of Deficiency:**
The deficiency may be due to expectations or practices previously 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 in 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. The submitted IEP must include the appropriate signatures of IEP meeting participants.
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.
- 3.

Monitoring Area: Program: Special Education

- **Issues Identified:**

- **Conditions Found Not in Compliance:**

Annual IEP goals and benchmarks /short-term objectives include a level of proficiency or accuracy (e.g., 80%) but do not specify the frequency of attainment.

- **Cause of Deficiency:**

The cause of the deficiency is unknown.

- **Effect of Deficiency:**

Without fully measurable goals, it becomes difficult for educators and parents to determine whether the student is making adequate progress. Measurable goals must include both a **quantifiable accuracy rate and frequency standard** to provide a clear benchmark for success. Valid progress monitoring occurs when educators can objectively assess whether the student achieves a specified level of accuracy across multiple trials (e.g., *80% accuracy/proficiency in 4/5 trials*).

- **Criteria Used**

- [NAC 388.284](#)
- [34 CFR 300.320](#)
- **Improvement Plan:**
To strengthen the quality and compliance of IEP development, it is essential that all IEP goals include clear and measurable components. Each goal must specify both the expected level of proficiency or accuracy and the frequency with which the skill should be demonstrated. These details provide staff with clear criteria for monitoring student progress and determining whether goals have been met. When goals lack measurable components, it becomes difficult to track progress accurately, evaluate the effectiveness of instruction, or ensure accountability in service delivery. Strengthening this practice supports consistent implementation, compliance with IDEA and NAC requirements, and improved educational outcomes for students.

The school should submit evidence of correction to the SPCSA:
 1. **Specific to this File:** Submit the student's next IEP, which must include IEP goals that specify both the level of proficiency/accuracy and the frequency of attainment. The submitted IEP must include the appropriate signatures of all IEP meeting participants.
 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.

Monitoring Area: Program: Special Education

- **Issues Identified:**
 - **Conditions Found Not in Compliance:**
The monitored Individualized Education Plan (IEP) includes an annual goal for math. However, the Present Levels of Academic and Functional Performance (PLAAFP) section indicates that the student “*demonstrates grade-level math skills.*” Additionally, no Specially Designed Instruction (SDI) service minutes are documented to address this math goal..
 - **Cause of Deficiency:**
The cause of the deficiency is unknown.
 - **Effect of Deficiency:**
The lack of alignment among the PLAAFPs, IEP goals, and SDI does not provide a structured and effective educational plan for the student.
- **Criteria Used**
 - [NAC 388.284](#)
 - [34 CFR 300.320](#)
- **Improvement Plan:**
To strengthen the quality and compliance of IEP development, it is essential that the Present Levels of Academic Achievement and Functional Performance (PLAAFP), IEP goals, and Specially Designed Instruction (SDI) are clearly aligned. Each goal should be directly supported by data in the PLAAFP and connected to the corresponding SDI services to ensure that

instruction targets the student's identified areas of need. When this alignment is missing, staff may lack the guidance needed to implement services effectively, and the IEP may not provide a clear plan for addressing the student's specific skill deficits. Strengthening this practice promotes coherent, data-driven IEPs that support compliance with IDEA and NAC requirements while improving the effectiveness of instruction and student outcomes.

The school should submit evidence of correction to the SPCSA:

1. **Specific to this File:** Submit the student's next IEP, with appropriate signatures of IEP meeting participants, that demonstrates alignment among the PLAAFPs, IEP goals, and SDI. Please note that if the student's goal is to work on specific skills in a particular area, it must only be a goal in that area (e.g., Math/calculation goals must only be labeled as Math goals).
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.