

House District 7

Senate District 4

**THE TWENTY-SEVENTH LEGISLATURE
APPLICATION FOR GRANTS & SUBSIDIES
CHAPTER 42F, HAWAII REVISED STATUTES**

Log No:

For Legislature's Use Only

Type of Grant or Subsidy Request:

GRANT REQUEST – OPERATING

GRANT REQUEST – CAPITAL

SUBSIDY REQUEST

"Grant" means an award of state funds by the legislature, by an appropriation to a specified recipient, to support the activities of the recipient and permit the community to benefit from those activities.

"Subsidy" means an award of state funds by the legislature, by an appropriation to a recipient specified in the appropriation, to reduce the costs incurred by the organization or individual in providing a service available to some or all members of the public.

"Recipient" means any organization or person receiving a grant or subsidy.

STATE DEPARTMENT OR AGENCY RELATED TO THIS REQUEST (LEAVE BLANK IF UNKNOWN):

STATE DEPARTMENT OF EDUCATION

STATE PROGRAM I.D. NO. (LEAVE BLANK IF UNKNOWN):

1. APPLICANT INFORMATION:

Legal Name of Requesting Organization or Individual:
Ho'okako'o Corporation

Dbas:
Waimea Middle Public Conversion Charter School

Street Address:
**1360 South Beretania Street, Suite 202
Honolulu, HI 96814**

Mailing Address:
**P.O. Box 11685
Honolulu, HI 96828**

2. CONTACT PERSON FOR MATTERS INVOLVING THIS APPLICATION:

Name **MATT HORNE**

Title **Principal**

Phone # **(808) 887-6090 ext. 225**

Fax # **(808) 887-6087**

e-mail **matt_horne@wmpccs.org**

3. TYPE OF BUSINESS ENTITY:

- NON PROFIT CORPORATION
- FOR PROFIT CORPORATION
- LIMITED LIABILITY COMPANY
- SOLE PROPRIETORSHIP/INDIVIDUAL

6. DESCRIPTIVE TITLE OF APPLICANT'S REQUEST:

Grant In Aid Proposal for Instructional Coaching At Waimea Middle School to Provide Enhanced, Job-Embedded Professional Development to Expedite Implementation of the Common Core State Standards and Dramatically Improve Student Achievement

4. FEDERAL TAX ID # [REDACTED]

5. STATE TAX ID #: [REDACTED]

7. AMOUNT OF STATE FUNDS REQUESTED:

FISCAL YEAR 2014: \$ **456,000**

8. STATUS OF SERVICE DESCRIBED IN THIS REQUEST:

- NEW SERVICE (PRESENTLY DOES NOT EXIST)
- EXISTING SERVICE (PRESENTLY IN OPERATION)

SPECIFY THE AMOUNT BY SOURCES OF FUNDS AVAILABLE AT THE TIME OF THIS REQUEST:

STATE \$ **1,211,772** (State Per-Pupil - school operations)

FEDERAL \$ **28,786** (Title - school operations)

COUNTY \$ **0**

PRIVATE/OTHER \$ **77,473** (Private Funding - school operations)

TYPE NAME & TITLE OF AUTHORIZED REPRESENTATIVE:

[REDACTED]

MEGAN MCCORRISTON, EXECUTIVE DIRECTOR

NAME & TITLE

JANUARY 30, 2013

DATE SIGNED

Application for Grants and Subsidies

If any item is not applicable to the request, the applicant should enter “not applicable”.

I. Background and Summary

This section shall clearly and concisely summarize and highlight the contents of the request in such a way as to provide the State Legislature with a broad understanding of the request. Include the following:

1. A brief description of the applicant's background;
2. The goals and objectives related to the request;
3. The public purpose and need to be served;
4. Describe the target population to be served; and
5. Describe the geographic coverage.

Executive Summary:

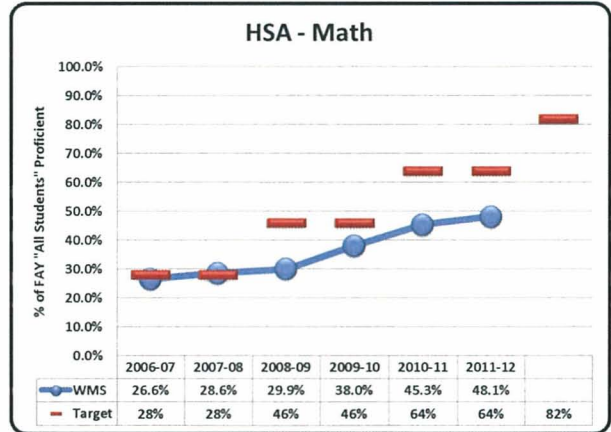
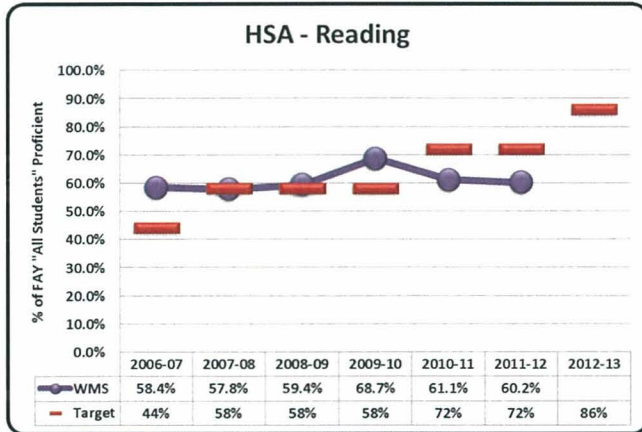
A request to fund the first year of a three-year, job-embedded Instructional Coaching program for teachers in the areas of Curriculum Development, Math Instruction, Literacy Instruction and Integration, and Instructional Technology to fully realize academic benefits of the new Common Core State Standards. As teacher capacity is built through this coaching, WMS proposes to use reserve funds released from Ho'okako'o for Common Core State Standards implementation and other School Improvement initiatives including Expanded Learning Time (ELT), providing additional time for what will be highly-effective core instruction, enrichment and intervention opportunities. Common Core State Standards implementation represents a huge shift in virtually every aspect of teaching and learning – involving curriculum, instruction and assessment. The rigor required also involves rethinking the use of class time, such that, even for seasoned master teachers, re-inventing practices and designing new approaches will be necessary. Hence, this project will require the continuity of a full three-year implementation plan for which future funding will need to be secured.

Waimea Middle School Background:

- Located in a rural Hawai'i Island community
 - The public middle school serving residents of a 40-mile radius including Waimea, Kawaihae and Puako – approx. 18,000
- Converted from DOE to Public Charter in 2003
- **285 Students in Grades 6, 7 and 8**
- **67% Qualify for Free & Reduced Lunch**
- **54% are Native Hawaiian**
- **7.1% are Micronesian**
- **15% Mobility** (withdrawing & enrolling)
- **16% receive Special Education**
- **17% qualify for Migrant Education (MEP)**
- **8.4% are English Language Learners (ELL)**
- **23 Full-Time Certificated Positions**
 - **15 Classroom Teachers**
 - **5 Special Education Teachers**
 - **1 Student Services Coordinator**
 - **1 School Counselor**
 - **1 Registrar**
- **1 Administrator**
- **7 Educational Assistants & ELL/MEP Support**
- **3 Custodians**
- **6 Other Full-Time Staff**

Waimea Middle School's Academic Standing and Evidence of Need for School Improvement:

- WMS has been in School Improvement Status since before becoming a Charter School in 2003
- WMS has not made Annual Yearly Progress (AYP) since 2006-07
- Students demonstrating proficiency last year – **Reading: 60.2%, Math 48.1%** (Last year's State targets for AYP were 72% for reading and 62% for math; this year the AYP targets have risen to 86% for reading and 82% for math.)
- The following graphs outline the last 6-years of student progress on the Hawaii State Assessments



Adding to the challenge is the fact that over 50% of incoming 6th graders enter below or well-below grade level.

Since becoming a public charter school in 2003, WMS has implemented a wide array of school improvement strategies, addressing curriculum, instruction and assessment, and also significantly improving family engagement and community involvement. Initially, this collective effort resulted in improved scores, high attendance and positive behaviors, but as data above indicates, academic progress has not been sufficient to close the gap or meet annual yearly progress goals.

Public Purpose, Goals, and Objectives for Instructional Coaching:

Hawaii's public education policy makers – supported by the State Legislature as well as by federal policy – have set yearly targets for the percentage of students that should be at or above proficiency. At present, a preponderance of WMS students do not meet the targets. Further, it is our belief that these targets should be viewed as a “minimum” expectation. Student proficiency must be the goal to adequately prepare public school students for College and Career in the 21st Century.

A wide body of research and experience from implementation of School Improvement and School Turnaround initiatives across the United States has collectively concluded that, to realize meaningful change to classroom instruction, job-embedded professional development is necessary. Research from the US Dept. of Education reveals that simply providing teachers with a series of workshops or allowing them to attend conferences had little to no impact on day-to-day classroom instruction. The only way to dramatically improve student achievement is by more carefully aligning what is taught (curriculum) and refining how it is taught (instruction) in the classroom, every day.

An instructional coach is an on-site professional development resource who partners with educators to identify and assist with the design of effective curriculum and the implementation of proven teaching methods. By providing real-time, front-line professional development to teachers, coaches are able to address issues faced daily in the classroom as well as provide immediate feedback and modeling. Instructional coaches are confidential mentors who provide a low-risk environment to refine instructional capacity. This is especially needed as mandated Common Core State Standards implementation dramatically change what and how teachers must teach.

II. Service Summary and Outcomes

The Service Summary shall include a detailed discussion of the applicant's approach to the request. The applicant shall clearly and concisely specify the results, outcomes, and measures of effectiveness from this request. The applicant shall:

1. Describe the scope of work, tasks and responsibilities;
2. Provide a projected annual timeline for accomplishing the results or outcomes of the service;
3. Describe its quality assurance and evaluation plans for the request. Specify how the applicant plans to monitor, evaluate, and improve their results; and
4. List the measure(s) of effectiveness that will be reported to the State agency through which grant funds are appropriated (the expending agency). The measure(s) will provide a standard and objective way for the State to assess the program's achievement or accomplishment. Please note that if the level of appropriation differs from the amount included in this application that the measure(s) of effectiveness will need to be updated and transmitted to the expending agency.

Scope of Instructional Coaching Work, Tasks and Responsibilities:

In order to align the material taught (curriculum) with the newly adopted Common Core State Standards and to improve how the material is taught (instruction) by increasing rigor to the level required for College and Career Readiness, we seek funding for four instructional coaches: a Curriculum Coach, a Literacy Coach, a Math Coach, and a Technology Coach.

The school administration will work with teacher leaders and other school stakeholders to create the detailed descriptions for each of these positions. Teacher leaders and stakeholders will also be involved in the recruitment and selection process. The school principal will ultimately be responsible for the recruitment, selection, hiring, support and evaluation of these newly hired individuals.

Curriculum Coach – The Common Core State Standards, which Hawaii will be transitioning to in the 2013-14 SY and fully implementing in 2014-15, represent a fundamental shift in both the content and the rigor of instruction for today's classrooms. A tremendous amount of training and transition work is necessary to effectively make the shift to the College and Career Readiness focus of the Common Core State Standards. The Curriculum Coach will work with all subject areas in the selection, development and implementation of updated curriculum.

Math Coach – The Math Coach will build relationships with the Math subject area teachers as well as the other content area teachers as they design curriculum, instruction, formative assessment, and intervention to meet the needs of all students. Coaching is confidential, non-evaluative, and supportive. The Math Coach will work one-on-one and in small groups with teachers on specific teaching strategies or problems, focusing on practical changes they can make in their classrooms to impact student learning.

Literacy Coach – The Literacy Coach will work with all subject area teachers to build understanding and implementation of the rigorous literacy standards included in the Common Core State Standards. Under the Common Core State Standards, all subject area teachers have responsibilities for supporting reading, writing, listening, and speaking into their lessons. The Literacy Coach will assist teachers with planning

and delivery of rigorous lessons aligned to standards. The Literacy Coach will also provide modeling and no-risk feedback to teachers as they refine their practice.

Technology Coach – The Technology Coach will interface with all teachers and staff to support student achievement through the integration of technology into instruction. The Technology Coach will facilitate professional development opportunities as well as job-embedded modeling and feedback to teachers as they incorporate technology to prepare students for College and Career in the 21st Century. The Technology Coach will also provide insight and recommendations on ways to increase the use of technology to positively impact student performance.

Projected Annual Timeline:

- **May 2013**
 - Creation of the specific position descriptions for the Instructional Coaches
- **May – June, 2013**
 - Recruitment, selection and hiring of the Instructional Coaches
- **July 2013**
 - Initial orientation and training of Instructional Coaches
 - Initial baseline data collection of student achievement and curricular/instructional implementation
- **August 2013**
 - Instructional Coaches begin full-time work alongside teachers as they prepare for the school year
 - Instructional Coaches participate in beginning-of-the-year training and orientation for all teachers
- **August – December 2013**
 - Instructional Coaches work side-by-side with teachers and administrators to implement Common Core State Standards and improve instructional rigor and common practice
 - Regular meetings of an Instructional Leadership Team including the school administration and Instructional Coaches
 - Ongoing training and capacity building opportunities for Instructional Coaches to grow and bring back to share with classroom teachers
- **January 2014**
 - Mid-year data collection and progress reporting to the Local School Board and Local Advisory Panel (LAP)
 - Collection of feedback data from teachers to refine services delivered by Instructional Coaches
- **January – May 2014**
 - Instructional Coaches continue to work side-by-side with teachers and administrators to implement Common Core State Standards and improve instructional rigor and common practice
 - Regular meetings of an Instructional Leadership Team including the school administration and Instructional Coaches
 - Ongoing training and capacity building opportunities for Instructional Coaches to grow and bring back to share with classroom teachers
- **June 2014**
 - End-of-year data collection and progress reporting
 - Collection of feedback data from teachers to refine services delivered by Instructional Coaches

As funding is secured, the timeline described above will repeat for **school years 2014-15 and 2015-16.**

Quality Assurance, Evaluation, and Reporting of Instructional Coaching:

As the overall goal of Instructional Coaching is improvement in student achievement through the refinement of curriculum and instructional practice, baseline and progress monitoring data will be collected and reported on both student achievement and implementation of effective instructional practice. Progress monitoring reports will be given to the Local School Board as well as the Local Advisory Panel (LAP), a representative group of stakeholders who meet monthly to advise and provide input for the effective operation of the school to improve student achievement. A report will be provided

at the end of the 2013-14 school year to the appropriate agency, as designated by the Legislature, to evaluate and reflect on progress, findings, and recommendations.

Student achievement data will be collected in the form of summative and formative assessments in reading and math:

- **Hawaii State Assessment** (transitioning to the Smarter Balanced Assessment in 2014-15) – This assessment is given in Reading and Math three times per year and once per year in Science. The results can be appropriately used to monitor changes in student achievement from year-to-year.
- **STAR Benchmarking and Progress Monitoring** – This school-wide assessment for Reading and Math may be given as frequently as needed. The results can be appropriately used to monitor student progress from month-to-month
- **School-wide Writing Assessment** – This teacher developed and scored assessment of riting proficiency, given twice per year, can appropriately be used to monitor changes in student achievement from year-to-year.
- **Grades and Classroom Assessments** – These teacher-developed measures and reporting metrics are updated a minimum of every two weeks and may appropriately be used to monitor general student success on an ongoing basis.

Curriculum and instruction implementation data will be an equally important measure of the success of Instructional Coaching. As part of their duties, Instructional Coaches will collect anonymous data about the implementation of curriculum and instructional practices in classrooms. For example, a team of Instructional Coaches may visit every classroom in the school during a given period to determine that 85% of teachers had learning objectives clearly posted for their lessons. This type of non-evaluative, nameless data gives a valuable metric for measuring the implementation of effective teaching practices and the impact of Instructional Coaching on classroom teaching.

III. Financial

Budget

1. The applicant shall submit a budget utilizing the enclosed budget forms as applicable, to detail the cost of the request.
2. The applicant shall provide its anticipated quarterly funding requests for the fiscal year 2014.
3. The applicant shall provide a listing of all other sources of funding that they are seeking for fiscal year 2014.
4. The applicant shall provide a listing of all state and federal tax credits it has been granted within the prior three years. Additionally, the applicant shall provide a listing of all state and federal tax credits they have applied for or anticipate applying for pertaining to any capital project, if applicable.

(Applicable Budget Forms Attached)

Anticipated Quarterly Funding Requests:

Fiscal Year 2014:

Quarter 1	Quarter 2	Quarter 3	Quarter 4	Total Grant Request
\$ 187,333	\$ 133,333	\$ 133,333	\$ 0	\$ 454,000

Other Sources of Funding Sought for 2014:

STATE Per-Pupil Allocation	General School Operations	\$ 1,600,000
FEDERAL Title I Funding	Title I School Operations	\$ 150,000
PRIVATE Funding	Supplementary School Operations	\$ 420,000

(figures approximated based on an enrollment of 285 students)

Tax Credit Information:

The Ho'okako'o Corporation does not receive, nor do they expect to apply for any state or federal tax credits.

IV. Experience and Capability

A. Necessary Skills and Experience

The applicant shall demonstrate that it has the necessary skills, abilities, knowledge of, and experience relating to the request. State your experience and appropriateness for providing the service proposed in this application. The applicant shall also provide a listing of verifiable experience of related projects or contracts for the most recent three years that are pertinent to the request.

WMS School Improvement History:

Since becoming a public charter school in 2003, WMS has implemented a wide array of school improvement strategies, addressing curriculum, instruction and assessment, and also significantly improving family engagement and community involvement. Initially, this collective effort resulted in improved scores, high attendance and positive behaviors, but as data above indicates, recent academic progress has not been sufficient to close the gap or meet annual yearly progress goals. Student academic growth has remained mostly flat as state targets have continued to rise.

Ho'okako'o Corporation's Supportive Partnership:

For the last decade, Ho'okako'o Corporation has served as a private, non-profit supporting innovative educational choices through public conversion charter schools. Ho'okako'o was established as a partnership between a volunteer board of directors and Kamehameha Schools and currently supports and governs Waimea Middle Public Conversion Charter School and two other conversion charter schools in Hawai'i. Through collaboration with the community, families and educators, and with access to funds from established partnerships, the federal and state government, and private sponsors, Ho'okako'o works to empower school-community stakeholders to become part of the school improvement change process to achieve increased academic success for Hawai'i's children.

Project Leadership:

Leading this proposed school improvement project will be WMS' new Principal, Matt Horne. Mr. Horne's previous educational assignment in Oregon was to implement a 3-year, ARRA School Improvement Grant (1003(g)) for what was the lowest-performing high school in the state. Job-embedded instructional coaching was one of the primary strategies implemented – coupled with effective use of data – and proved highly effective, raising test scores over 20% per year, taking the school well above average in the state. That high school made such impressive gains despite far more challenging demographics than those found at WMS.

B. Facilities

The applicant shall provide a description of its facilities and demonstrate its adequacy in relation to the request. If facilities are not presently available, describe plans to secure facilities. The applicant shall also describe how the facilities meet ADA requirements, as applicable.

Facilities Description:

The school that is now Waimea Middle School began as a one-room schoolhouse in 1916. The original school was separated into Waimea Elementary School and Waimea Middle School in 2000 as the result of an extremely effective effort by families, community and staff who lobbied the Board of Education to separate the two schools. In June, 2003, the middle school converted to a public conversion charter school under Act 2 of the 2002 Hawaii State Legislature. Waimea Middle Public Conversion Charter School – as the public middle school serving the Waimea-Kawaihae-Puakoa region - retained occupation of the Department of Education (DOE) facilities and continues to operate in the DOE facilities today.

Legislative efforts are underway to expand WMS by the addition of an 8-classroom science and technology-focused building on the current campus. Working together with the elementary, the shared campus currently provides sufficient space to operate the two schools, however, space continues to be at a premium and opportunities for creative, 21st Century STEM-focused learning spaces or expansion are not readily available.

WMS, as a DOE facility, is fully ADA accessible.

V. Personnel: Project Organization and Staffing

A. Proposed Staffing, Staff Qualifications, Supervision and Training

The applicant shall describe the proposed staffing pattern and proposed service capacity appropriate for the viability of the request. The applicant shall provide the qualifications and experience of personnel for the request and shall describe its ability to supervise, train and provide administrative direction relative to the request.

Instructional Coach Qualifications, Training, and Capacity:

Instructional Coaches will be selected for their specialized teaching experience and demonstrated leadership in their field. Successful classroom teaching experience will be a non-negotiable qualification – an instructional coach's work requires them to develop credibility with their teacher peers as they both work collaboratively to refine their practice.

Specialized training opportunities will be identified and supported for these individuals with funding from this grant. They will participate in state, local, and individual training specific to their particular focus and then bring that information back to share and develop side-by-side with their teacher peers.

The four instructional coaches, along with the school administration, will form an educational leadership professional learning community to discuss both their own practice and the overall teaching practices of the school. This team will use a research-based model for a professional learning community to focus on data and practice to model and support professional development for the teaching staff.

Supervision, Administrative Support, and Educational Leadership:

In addition to the Principal, WMS will be using its own reserve funding to hire a vice-principal to serve as an additional instructional leader in the School Improvement process. Principal Matt Horne has deep experience with the instructional coaching model, professional learning communities, data driven decision making, and teacher supervision and evaluation. Together with the new vice-principal and technical assistance from Ho'okako'o and other consultants, WMS will have an appropriate level of administrative support and educational leadership to effectively implement Common Core State Standards and improve student proficiency.

B. Organization Chart

The applicant shall illustrate the position of each staff and line of responsibility/supervision. If the request is part of a large, multi-purpose organization, include an organizational chart that illustrates the placement of this request.

Instructional Coaches within the School Organization:

- **Ho'okako'o – Local School Board & Executive Director**
 - **Principal** – Responsibility for the Entire School Program
 - **Vice-Principal** – Support for the Principal and School Program
 - **Instructional Coaches – Work Hand-in-Hand and in Confidence with Teachers as well as Serving on the Instructional Leadership Team**
 - **Teaching Staff** – Provide Direct Delivery of Curriculum and Instruction to Students
 - **Educational Support Staff** – Provide Assistance to Teachers in the Delivery of Curriculum and Instruction
 - **Other Support Staff** – Provide Support for the Efficient Operation of the School Organization

VI. Other

A. Litigation

The applicant shall disclose any pending litigation to which they are a party, including the disclosure of any outstanding judgment. If applicable, please explain.

Pending Litigation or Outstanding Judgment:

Neither the Ho'okako'o Corporation nor Waimea Middle Public Conversion Charter School are a party to any pending litigation or outstanding judgment.

B. Licensure or Accreditation

The applicant shall specify any special qualifications, including but not limited to licensure or accreditation that applicant possesses relevant to this request.

Licensure and Accreditation:

Ho'okako'o is a private, non-profit organization established in 2002 to improve the quality of education offered to Hawaii's children through conversion charter schools. Waimea Middle School obtained Conversion Charter School status in June, 2003 as outlined in Act 2 of the 2002 Hawaii State Legislature.

WMS is currently working with the Western Association of Schools and Colleges (WASC) and Hawaii Association of Independent Schools (HAIS) toward receiving accreditation. It is anticipated that, following completion of a full self-study, creation of a detailed action plan, and a site visit by WASC/HAIS, WMS will receive accreditation in June, 2014.

This proposed GIA for Instructional Coaches addresses specific challenges identified in the school's draft Accreditation self-study and is intended to address a clear need to dramatically improve student proficiency.

BUDGET REQUEST BY SOURCE OF FUNDS
(Period: July 1, 2013 to June 30, 2014)

Applicant: **Ho'okako'o - Waimea Middle Public Conversion Charter School**

BUDGET CATEGORIES	Total State Funds Requested	Funds Needed in Subsequent Year (not included)*	Funds Needed in Subsequent Year (not included)*	
	(a)	(b)	(c)	(d)
A. PERSONNEL COST				
1. Salaries	240,000	240,000	240,000	
2. Payroll Taxes & Assessments	60,000	60,000	60,000	
3. Fringe Benefits	100,000	100,000	100,000	
TOTAL PERSONNEL COST	400,000	400,000	400,000	
B. OTHER CURRENT EXPENSES				
1. Airfare, Inter-Island				
2. Insurance				
3. Lease/Rental of Equipment				
4. Lease/Rental of Space				
5. Staff Training	40,000	40,000	40,000	
6. Supplies	16,000	8,000	8,000	
7. Telecommunication				
8. Utilities				
9				
10				
11				
12				
13				
14				
15				
16				
17				
18				
19				
20				
TOTAL OTHER CURRENT EXPENSES	56,000	48,000	48,000	
C. EQUIPMENT PURCHASES				
D. MOTOR VEHICLE PURCHASES				
E. CAPITAL				
TOTAL (A+B+C+D+E)	456,000	448,000	448,000	
SOURCES OF FUNDING		Budget Prepared By:		
(a) Total State Funds Requested	456,000	Matt Horne, Principal 808-887-6090 ext. 225		
(b)		Name (Please type or print) Phone		
(c)		[Redacted] January 30, 2013		
(d)		Signature of Authorized Official Date		
TOTAL BUDGET	456,000	Megan McCorriston, Executive Director		
		Name and Title (Please type or print)		

* Funds Needed in Subsequent Years 2 & 3 will be required to successfully build and cement instructional capacity. However, the Subsequent Year funds are not included in this GIA Budget Request.

**BUDGET JUSTIFICATION
PERSONNEL - SALARIES AND WAGES**

Applicant: Ho'okako'o - Waimea Middle Public Conversion Charter School
 Period: July 1, 2013 to June 30, 2014

POSITION TITLE	FULL TIME EQUIVALENT	ANNUAL SALARY A	% OF TIME ALLOCATED TO GRANT REQUEST B	TOTAL STATE FUNDS REQUESTED (A x B)
Curriculum Coach	1.0	\$60,000.00	100.00%	\$ 60,000.00
Literacy Instructional Coach	1.0	\$60,000.00	100.00%	\$ 60,000.00
Mathematics Instructional Coach	1.0	\$60,000.00	100.00%	\$ 60,000.00
Instructional Technology Coach	1.0	\$60,000.00	100.00%	\$ 60,000.00
				\$ -
				\$ -
				\$ -
				\$ -
				\$ -
				\$ -
				\$ -
				\$ -
				\$ -
				\$ -
				\$ -
				\$ -
TOTAL:				240,000.00
JUSTIFICATION/COMMENTS: Funds for these positions will be needed for a total of three years. Further Grant-in-Aid proposals will be submitted; additionally, other funding opportunities will be actively sought.				

BUDGET JUSTIFICATION - EQUIPMENT AND MOTOR VEHICLES

Applicant: **Ho'okako'o - Waimea Middle Public Conversion Charter School**
 Period: July 1, 2013 to June 30, 2014

DESCRIPTION EQUIPMENT	NO. OF ITEMS	COST PER ITEM	TOTAL COST	TOTAL BUDGETED
None			\$ -	
			\$ -	
			\$ -	
			\$ -	
			\$ -	
TOTAL:				
JUSTIFICATION/COMMENTS:				

DESCRIPTION OF MOTOR VEHICLE	NO. OF VEHICLES	COST PER VEHICLE	TOTAL COST	TOTAL BUDGETED
None			\$ -	
			\$ -	
			\$ -	
			\$ -	
			\$ -	
TOTAL:				
JUSTIFICATION/COMMENTS:				

BUDGET JUSTIFICATION CAPITAL PROJECT DETAILS

Applicant: **Ho'okako'o - Waimea Middle Public Conversion Charter School**

Period: July 1, 2013 to June 30, 2014

FUNDING AMOUNT REQUESTED						
TOTAL PROJECT COST	ALL SOURCES OF FUNDS RECEIVED IN PRIOR YEARS		STATE FUNDS REQUESTED	OF FUNDS REQUESTED	FUNDING REQUIRED IN SUCCEEDING YEARS	
	FY: 2011-2012	FY: 2012-2013	FY:2013-2014	FY:2013-2014	FY:2014-2015	FY:2015-2016
PLANS						
LAND ACQUISITION						
DESIGN						
CONSTRUCTION						
EQUIPMENT						
TOTAL:			None	None		
JUSTIFICATION/COMMENTS:						

**DECLARATION STATEMENT OF
APPLICANTS FOR GRANTS AND SUBSIDIES PURSUANT TO
CHAPTER 42F, HAWAII REVISIED STATUTES**

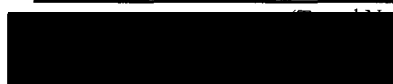
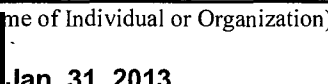

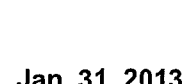
The undersigned authorized representative of the applicant certifies the following:

- 1) The applicant meets and will comply with all of the following standards for the award of grants and subsidies pursuant to Section 42F-103, Hawaii Revised Statutes:
 - a) Is licensed or accredited, in accordance with federal, state, or county statutes, rules, or ordinances, to conduct the activities or provide the services for which a grant or subsidy is awarded;
 - b) Complies with all applicable federal and state laws prohibiting discrimination against any person on the basis of race, color, national origin, religion, creed, sex, age, sexual orientation, or disability;
 - c) Agrees not to use state funds for entertainment or lobbying activities; and
 - d) Allows the state agency to which funds for the grant or subsidy were appropriated for expenditure, legislative committees and their staff, and the auditor full access to their records, reports, files, and other related documents and information for purposes of monitoring, measuring the effectiveness, and ensuring the proper expenditure of the grant or subsidy.
- 2) The applicant meets the following requirements pursuant to Section 42F-103, Hawaii Revised Statutes:
 - a) Is incorporated under the laws of the State; and
 - b) Has bylaws or policies that describe the manner in which the activities or services for which a grant or subsidy is awarded shall be conducted or provided.
- 3) If the applicant is a non-profit organization, it meets the following requirements pursuant to Section 42F-103, Hawaii Revised Statutes:
 - a) Is determined and designated to be a non-profit organization by the Internal Revenue Service; and
 - b) Has a governing board whose members have no material conflict of interest and serve without compensation.

Pursuant to Section 42F-103, Hawaii Revised Statutes, for grants or subsidies used for the acquisition of land, when the organization discontinues the activities or services on the land acquired for which the grant or subsidy was awarded and disposes of the land in fee simple or by lease, the organization shall negotiate with the expending agency for a lump sum or installment repayment to the State of the amount of the grant or subsidy used for the acquisition of the land.

Further, the undersigned authorized representative certifies that this statement is true and correct to the best of the applicant's knowledge.

Ho'okako'o Corporation – Waimea Middle Public Conversion Charter School

 (Signature)	 (Date)	 (Signature)	 (Date)
	Jan. 31, 2013		Jan. 31, 2013

Megan McCorrison, Ho'okako'o Executive Director **Matt Horne, WMPCCS Principal**
(Typed Names & Titles)



HOUSE OF REPRESENTATIVES

STATE OF HAWAII
STATE CAPITOL
HONOLULU, HAWAII 96813

January 30, 2013

The Honorable Sylvia Luke
Chair, House Finance & Committee Members
Hawai'i State Legislature - State Capitol
Honolulu, HI 96813

RE: GRANT IN AID REQUEST FROM WAIMEA MIDDLE PUBLIC CONVERSION CHARTER SCHOOL

Proposal for Instructional Coaching At Waimea Middle Public Conversion Charter School to Provide Enhanced, Job-Embedded Professional Development to Expedite Implementation of the Common Core State Standards and Dramatically Improve Student Achievement

Aloha Rep. Luke and House Finance Committee Members:

I am writing in strong support of the grant in aid proposal submitted by Waimea Middle Public Conversion Charter School. The grant in aid proposes piloting instructional coaching in rural Hawai'i. Instructional coaching has proven to be a "high yield strategy" to improve student learning and achievement in ways that:

- 1) Expedite implementation of mandated Common Core State Standards
- 2) Embrace current research and clinical knowledge about how to sustainably build capacity in ways that are rewarding to both teachers and students
- 3) Prepare this school-community to take a bold next step to implement Expanded Learning Time (ELT) to further enhance student achievement and also reintroduce the arts, higher level technology and career exploration into the school day.

This proposal potentially has far-reaching implications for Hawai'i schools as it attempts to replicate successes enjoyed in mainland schools with similar or more challenging economic, language and special education needs.

I ask your support in helping launch what represents a reasonable investment in finding ways to support not just Waimea School but all of our public schools.


Representative Cindy Evans
Chair, House Committee on Water and Land



The Senate

STATE CAPITOL
HONOLULU, HAWAII 96813

January 30, 2013

The Honorable Sylvia Luke
Chair, House Finance Committee & Committee Members
State Capitol, Room 306
415 S. Beretania Street
Honolulu, Hawai'i 96813

RE: GIA Proposal for Instructional Coaching At Waimea Middle Public Conversion Charter School to Provide Enhanced, Job-Embedded Professional Development to Expedite Implementation of the Common Core State Standards and Dramatically Improve Student Achievement

GIA Submitted by Ho'okako'o Corporation (the Local School Board)

Aloha Rep. Luke and House Finance Committee Members:

As public policy makers, we know only too well that far too many of our Hawai'i public and public charter schools struggle with enabling students to achieve or exceed academic proficiency in essential skills for college and career readiness.

This proposal for job-embedded instructional coaches at Waimea Middle Public Conversion Charter School (aka Waimea Middle School on Hawai'i Island) emulates a proven strategy used in mainland schools with similar or far more extreme demographics (ie, economic, language and special education challenges). It could not be more timely as our Hawai'i schools – across the board – are scrambling to implement new Common Core State Standards which requires “reinventing” both curriculum and instructional practice. This proposal presents an opportunity to experience and demonstrate this strategies' potential application for other Hawai'i schools.

As I'm sure you know, instructional coaches are not entirely new to Hawai'i, but have been used primarily district wide, meaning that the coaches drop into schools periodically and are not there on a day-to-day basis to, first – develop deep, meaningful, constructive, non-threatening relationships and understandings – and to be able to model and help cement in place proven instructional practices.

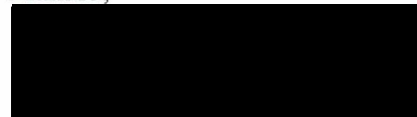
415 South Beretania Street, Room 210, Honolulu, Hawai'i 96813

Waimea Middle School's instructional leader, Principal Matt Horne, led the implementation of job-embedded instructional coaching at what was "the lowest performing high school" in Oregon in a community with much more challenging demographics (90% Title 1, 90% ELL students). Also, Waimea Middle School is exploring implementation of Expanded Learning Time (a longer school day) and has committed funds to this in 2014-'15 and beyond. However, the research says that the "first step" is improving curriculum and instructional practice – which dovetails with Common Core State Standards implementation.

Research says job-embedded professional development is a high yield strategy for building capacity and bridging the "knowing and doing gap" in ways that reward both teachers and students with success. Research further says that job-embedded instructional coaching requires a three-year commitment by the school and this is a one-year start-up GIA request. The school understands it will have to secure the necessary funding to continue the program but has faith that the results, even in the first year, will be significant enough to attract continued funding, either as another GIA or other sources.

As you may recall, Waimea Middle School experienced rough waters last school year. The school-community is clearly moving forward, focused on what's best for their students and willing to do the heavy lifting to improve academic outcomes. I fully support this request and ask your support as well.

Mahalo,



Senator Malama Solomon, Ph.D.
Hawai'i State Senate – 4th District
Hilo, Hāmākua, Kohala, Waimea, Waikoloa, Kona



WAIMEA MIDDLE PUBLIC CONVERSION CHARTER SCHOOL

Local Advisory Panel (LAP)

67-1229 MAMALAHOA HIGHWAY * KAMUELA, HAWAII 96743

January 30, 2013

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Chair, House Finance & Committee Members
Hawai'i State Legislature - State Capitol
Honolulu, HI 96813

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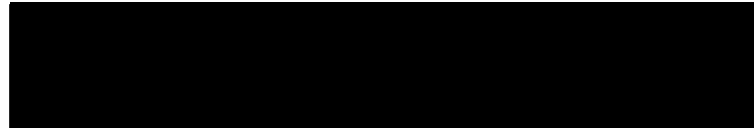
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Thus, I am writing to express the support of the school's duly-elected Local Advisory Panel for this Grant In Aid. LAP is made up of elected representatives of the student body, parents, certificated staff (teachers), classified staff, administration, Ho'okako'o Corp. (our 501c3 Local School Board) and community leaders, and this proposal was reviewed and discussed at our Jan. 28, 2013 LAP meeting.

As a community member, I would further comment that I view the school's educational leadership team as being courageously committed to doing what's best for their students. The decision to become the state's first public conversion charter school in 2003 under Act 2/2002 was a risky step into the unknown. If there were clear easy answers to help students meet or exceed NCLB education targets and also help them become well rounded world citizens imbued with cultural awareness and respect, then everyone would be doing it...not just here in Hawai'i but across the U.S. I have high regard for this educational team's willingness to explore innovative strategies that have worked well elsewhere and apply them here – adjusting them as needed to suit the unique circumstances of their students and families.

I hope you will consider supporting this request and welcome the opportunity to discuss this and the school's overall programming if you wish. Please feel free to call or email me personally.


Dr. Kamanamaikalani Beamer
Assistant Professor

Hui 'Aina Momona - UH-Manoa School of Hawaiian Knowledge and William S. Richardson Law School
Tel: 808-885-7535

Email: beamer@hawaii.edu



The Senate

STATE CAPITOL
HONOLULU, HAWAII 96813

January 30, 2013

The Honorable David Ige
Chairman, Senate Ways & Means & Committee Members
State Capitol, Room 208
415 S. Beretania Street
Honolulu, Hawai'i 96813

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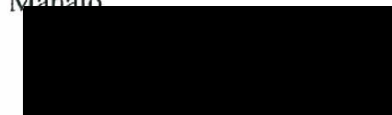
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Aloha 'Aina

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Tel: (808) 885-7535 Email: beamer@hawaii.edu

Executive Summary:

The Top 10 Things to Know about The Common Core Standards Initiative

1. What is the Common Core Standards Initiative?

The Common Core Standards Initiative is a collaborative effort led by the National Governor's Association and the Council of Chief School Officers with partners and leaders across education and business, aimed to establish a shared set of clear educational standards for English language arts and mathematics that states can voluntarily adopt. The intention of the CCSS is to have a rigorous set of standards that specifically identify the learning outcomes needed to help schools prepare students to be college and career ready.

2. Which states are adopting the Common Core?

As of January, 2011, 40 states, and the District of Columbia have formally or informally committed to adopting the Common Core State Standards for English-language arts and mathematics for grades K-12 and are in the process of aligning state assessments, curriculum, and classroom practices to integrate the new standards. Alaska, Texas, and Virginia have indicated that they do not plan to adopt the standards.

3. How will states assess the Common Core?

Two consortia have been awarded competitive grant funds for the development of tests to assess the Common Core Standards. SMARTER Balanced Assessment Consortium (SBAC) was awarded a four-year \$176 million Race to the Top assessment grant by the U.S. Department of Education to develop a student assessment system aligned to a Common Core of academic standards. Partnership for the Assessment of Readiness for College and Careers (PARCC or Partnership) PARCC RttT Assessment Consortium was awarded \$170 of the \$330 million. Assessments are expected for 2014 and are expected to include results from performance-based tasks through testing and traditional end-of-year assessments. Both plan to include end of year assessments offered online.

4. How will states implement and fund the Common Core?

This will be a hot area to watch as districts do not yet know how they will fully manage the implementation of the Common Core and the budget required to introduce new assessments and new curricula. We do know that states will be working within a three-year timeline as assessments are anticipated to be ready for 2014.

5. What will Common Core Implementation plans need to address?

There is currently no governance in place yet so the specifics of implementation are still unfolding as states sign on. It is expected that Common Core implementation plans will need to address the following items:

- Developing research-based practices using Common Core
- Developing teacher training and PD
- Researching and Aligning instructional material
- Investigating formative and summative assessments to be used before or instead of rollout of common assessments.

6. What role will the U.S. DOE play?

Although the U.S. DOE supports the Common Core Initiative, they have had no role in the development of the Common Core State Standards. Their involvement moving forward will depend heavily on future elections and overall changes to the role of the Federal Government in education. If the Fed continues to be a driving force in setting the education agenda with a reauthorization of the Elementary and Secondary Education Act then they could play a big role in linking competitive grant funding to the adoption and successful implementation of the Common Core Standards and new requirements for College and Career ready students.

7. What's happening with The Common Core Standards in Reading/ELA?

1. The following are the areas that have surfaced as leading considerations/factors with the Common Core State Standards for English Language Arts and Literacy in History/Social Studies, Science, Technical Subjects:

- Increased Rigor/Text Complexity: An emphasis on supporting students in being able to work with increasingly more complex texts.
- Nonfiction & Informational Text: While this includes a heavy focus on nonfiction, in particular information texts; and on

- Writing: Increased emphasis on writing, in particular across the curriculum.
 - Content area responsibility for literacy: An acknowledgement that literacy development is a shared responsibility across the content domains.
 - Vocabulary: A focus on general academic vocabulary and domain-specific vocabulary.
 - Independent reading: While the emphasis of the CCSS is upon reading, writing, speaking and listening; the intention is that a concentrated effort be placed upon developing content-area literacy in science, social studies and technical subjects.
2. Common Core Curriculum Mapping Project in English/Language Arts has created curriculum maps to translate the CCS for K-12.
 3. Based on the Fordham Institute Study of Common Core Standards (State of the State Standards – and the Common Core in 2010) the Common Core Standards are more rigorous than a majority of state’s standards (37 states).

8. What are key points to remember about the Common Core for English Language Arts/Literacy?

- Standards support a balance of literacy and informational texts
- Standards emphasize text complexity, canonical texts, and text evidence in K-12
- Language standards include vocabulary, with an emphasis on academic vocabulary
- History/social studies, science and media/technology are integrated
- Emphasis on multiple texts and critical/evaluative reading

9. What’s happening with the Common Core in Mathematics?

1. The following are the areas that have surfaced as leading considerations/factors with the Common Core and Mathematics.
 - Shifting from mile-wide, inch-deep curriculum: Deepen understanding of the most critical key topics at each grade level.
 - Coherent progression: Further enhance mastery of these key grade level topics through coherent progressions across grade levels.
 - Conceptual understanding and procedural fluency: Strike a balance between building conceptual understanding while increasing procedural fluency.
 - Foster reasoning and sense-making in mathematics: Encourage the critical-thinking and problem-solving skills students need to be successful 21st century thinkers.
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10. What are key points to remember about the Common Core for Mathematics?

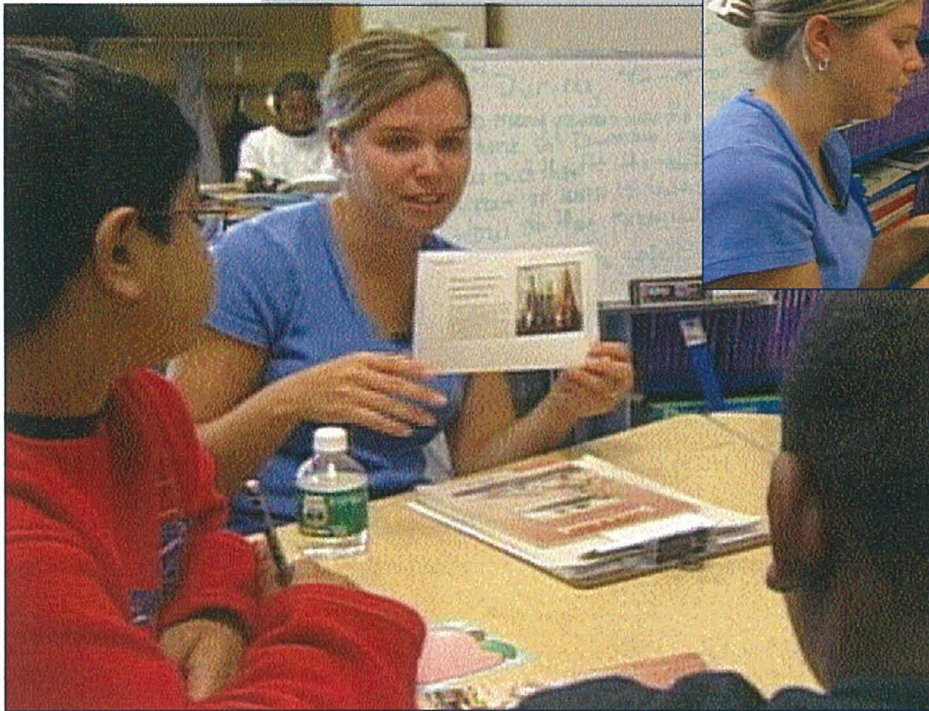
- Focus and coherence: standards focus on key topics at each grade level and coherent progressions across grade levels
- Balance of concepts and skills: Standards require both conceptual understanding and procedural fluency
- Mathematical practices: Standards foster reasoning and sense-making in mathematics
- College and career readiness: Standards are ambitious but achievable

Important Note: What the Common Core Standards do NOT define:

- How teachers should teach
- All that can or should be taught
- The nature of advanced work beyond the common core
- Interventions needed for students well below grade level
- Full range of support for English Language Learners
- Full range of support for students with special needs

Article: *Instructional Coaching: Professional Development Strategies that Improve Instruction*
The Annenberg Institute for School Reform, 2008; www.annenberginstitute.org

Instructional Coaching



Annenberg
Institute for
School Reform

Professional Development Strategies
That Improve Instruction

The Annenberg Institute for School Reform (AISR) at Brown University works with urban school systems across the country that are engaged in comprehensive school reform, especially in communities serving disadvantaged children. In our work, we support and encourage the use of instructional coaching, a promising new professional development practice in which teacher leaders serve as coaches to facilitate and guide content-focused professional learning for a school's teachers.

Coaching aligns with the Institute's interrelated focal areas for systemwide school improvement: district redesign, leadership, opportunity and accountability, and community-centered education reform. Indeed, effective coaching incorporates an array of interrelated approaches we advocate that promote coherence, focus, and alignment at multiple levels of a school system:

- **Investment in human capital.** Effective coaches and coaching structures build instructional and leadership capacity by applying what is known about adult learning and change theory.
- **Sustainability.** Coaching supports the systemic improvement efforts of school communities that push beyond individual teacher behavior or even the work of an individual school.
- **Equity and internal accountability.** Coaching holds the potential to address inequities in opportunities for teacher and student learning by providing differentiated, targeted supports. The structures and culture that well-implemented coaching models promote can increase collective responsibility throughout a school system for students and their learning.
- **Connecting school and district.** In cases where coaches are effective liaisons between school practice and district initiatives, emerging evidence shows that they can facilitate professional learning that supports systemwide initiatives more powerfully.

The Institute believes that – when employed and supported effectively – instructional coaching enhances district professional development systems by providing school and central office personnel with sustained, targeted supports to build knowledge, improve practice, and promote student achievement.

School-Based, Job-Embedded Professional Development

Instructional coaching is grounded in current research and clinical knowledge on leadership and schools as “professional communities of practice.” Recent research on professional development suggests that it is most effective when it includes components that are based in the school and embedded in the job and when it increases teachers' theoretical understandings of their work (Miller 1995). Supports for improved teaching and learning are also more effective when they are tai-

lored to needs identified by teachers and when their approach to learning is collaborative and inquiry-based (Darling-Hammond and McLaughlin 1995).

Coaching provides such supports through an array of activities (see sidebar) designed to build collective leadership and continuously improve teacher instructional capacity and student learning. These activities, ideally, coalesce in ways that create internal accountability due to the embedded nature of the work and people engaged in it (Barr, Simmons, and Zarrow 2003; WestEd 2000). A well-designed and -supported coaching program weaves core elements of effective professional development with the essential goals of professional learning communities in ways that advance both school and systemic improvement.

Effective Coaching

Lessons from Research

The principles of instructional coaching are grounded in research on effective professional development and professional learning communities. Coaching appears to be a promising approach because it strives to blend what is known about effective professional development with school-based and school-specific needs regarding both content and school climate.

Evidence of increased student learning as a direct result of coaching is not yet well documented (Poglinco et al. 2003). But, as coaching is increasingly used and its impact measured, researchers expect more and more links to be established between coaching and student achievement. A growing body of research suggests that coaching is a promising element of effective professional development in some of the following ways.

❖ **Effective coaching encourages collaborative, reflective practice.**

Coaching shifts professional learning from direct instruction outside the context of practice (such as workshops and conferences) to more varied opportunities to improve discipline-specific practice. Most studies show that coaching leads to improvements in instructional capacity. For instance, teachers apply their learning more deeply, frequently, and consistently than teachers working alone; teachers improve their capacity to reflect; and teachers apply their learning not only to their work with students, but also to their work with each other (Neufeld and Roper 2003; Poglinco et al. 2003).

❖ **Effective embedded professional learning promotes positive cultural change.**

The impact of coaching often goes beyond improving content instruction. The conditions, behaviors, and practices required by an effective coaching program can affect the culture of a school or system, thus embedding instructional change within broader efforts to improve school-based culture and conditions (Neufeld and Roper 2003).

What Does Coaching Look Like?

Instructional coaching is fundamentally about teachers, teacher leaders, school administrators, and central office leaders examining practice in reflective ways, with a strong focus on student learning and results as the ultimate barometer of improvement. In instructional coaching (sometimes referred to as content-based coaching), teacher leaders, or coaches, facilitate and guide a school-based professional learning program for groups of teachers in specific content areas. These groups focus on the intersection of school and student needs and district reform initiatives with the goal of building a professional learning community that supports collective leadership, continuous improvement of teaching practice, and, ultimately, improved student learning.

A well-designed coaching system exhibits three key components:

1. **Structural conditions** that support effective coaching, which include but are not necessarily limited to

- clearly articulated district initiatives and goals that are directly linked to expected coaching outcomes;
- a content focus (such as literacy);
- structural guidelines (coaching is for groups rather than individuals);
- systematic measurement of work and impact (data and evidence documentation);

- a generally accepted set of principles for adult learning, including collaborative, ongoing, job-embedded work that is actively constructed and refined by participants;
- dedicated time for teacher groups to meet, learn together, analyze their work, observe each other, collect evidence of their work and its impact, and refine their practice.

2. **A guided, content-based focus on adult learning** in a school-based professional learning environment that enables coaches to

- focus on data- and evidence-informed learning;
- promote adult learning in a way that models classroom practice;
- construct and apply knowledge and skills in the classrooms of participating teachers;
- develop school and teacher learning plans that focus on content and leadership;
- make connections and ensure alignment with the larger system;
- continuously measure, document, reflect upon, and adjust professional learning opportunities.

3. **Instructional leadership** by coaches who typically

- observe instruction and provide feedback to teachers;
- construct opportunities for groups of teachers to observe each other;

- structure time for teachers to discuss their learning from classroom observations, modeled lessons, etc.;
- model particular instructional strategies for individuals or groups of teachers;
- employ multiple strategies to gather and analyze student evidence with teachers;
- facilitate teacher meetings during professional development time, common planning time, etc.;
- support teachers in group, and, if necessary, individual settings;
- engage in their own learning with other coaches and content specialists to improve their work.

Coaches must be knowledgeable about not only their content area, but also district reform goals, achievement standards, and adult learning. Meeting such a range of goals requires that coaches possess strong communication and interpersonal skills, consistently follow through with support for teachers, and demonstrate a willingness to listen and learn (Neufeld and Roper 2003). The degree to which coaches possess these skills impacts the success of standards-based instruction in the classroom and the quality of links to district supports and broader school reform efforts; emerging evidence shows that teachers' success at changing practice mirrors the work of the coaches (Neufeld and Roper 2003; Poglinco et al. 2003).

❖ **A focus on content encourages the use of data analysis to inform practice.**

Effective coaching programs respond to particular needs suggested by data, allowing improvement efforts to target issues such as closing achievement gaps, supporting teachers across career stages, and advocating for equity (e.g., through differentiated instruction). A coaching program guided by data helps both to create coherence within a school and to bridge different levels of the system (Barr, Simmons, and Zarrow 2003) by focusing on strategic areas of need that are suggested by evidence, rather than by individual and sometimes conflicting

opinions. Coaches can then be chosen who have the content expertise and organizational development capacity to lead their “cadres” toward more effective practice in these areas of need at various levels of the educational system.

❖ **Coaching promotes the implementation of learning and reciprocal accountability.**

Coaching is an embedded, visible support – usually funded by the district – that attempts to respond to student and teacher needs in ongoing, consistent, dedicated ways. The likelihood of using new learning and sharing responsibility rises when colleagues, guided by a coach, work together and hold each other accountable for improved teaching and learning (Barr, Simmons, and Zarrow 2003; Coggins, Stoddard, and Cutler 2003; WestEd 2000). And because instructional coaching takes place in a natural setting – the classroom rather than a hotel ballroom – observation, learning, and experimentation can occur in real situations (Neufeld and Roper 2003).

❖ **Coaching supports collective, interconnected leadership across a school system.**

An essential feature of coaching is that it uses the relationships between coaches, principals, and teachers to create the conversation that leads to behavioral, pedagogical, and content knowledge change. Effective coaching distributes leadership, supporting the goals of effective principals through the coaches by keeping the focus on teaching and learning. This focus promotes the development of leadership skills, professional learning, and support for teachers that target ways to improve student outcomes (Lyons and Pinnell 2001).

Research findings indicate that effective coaching structures promote a collaborative culture where large numbers of school personnel feel ownership and responsibility for leading improvement efforts in teaching and learning. Coaching attends to the “social infrastructure” issues of schools and systems (Payne 1998) that often impede the deep and lasting change that school reform requires. These issues include school climate, teacher isolation, insufficient support, and limited instructional and leadership capacity. The attempt to address these critical elements of school quality by incorporating new understandings of effective professional development is a primary reason that coaching holds significant promise toward improving teaching and learning in urban schools (Neufeld and Roper 2003).

Lessons and Implications from the Institute’s Work

As coaching has emerged as an increasingly common component of systemic reform, the Annenberg Institute has had the opportunity to work with, learn from, and observe in districts that are considering or engaged in instructional coaching as part of their professional development systems. Over time and in varied settings, we have observed some noteworthy challenges to effective coaching.

❖ **Too great a focus on the classroom isolates coaching from systemic goals.**

One of the strengths of instructional coaching is that it is grounded at the school

and classroom level, allowing coaches to work as responsive, constructivist models for professional learning. This same strength, however, can create an array of divergent approaches to teacher learning and to building content knowledge, particularly in large or decentralized systems.

We have found the greatest coherence where coaching is guided by districtwide goals and standards that are grounded in research and experience, thereby avoiding disparate approaches at the school level and ineffective, diluted supports from the central office. To position coaching as a districtwide effort, a school and district need to develop decision-making systems that show commitment to a coaching program as a part of a shared practice. They need to identify strategies for communicating the coaching approach to a wide audience, designate the personnel required to do so, jointly invest in and create professional development *for coaches*, and clearly define criteria for hiring and evaluating coaches.

Clarity about the districtwide nature of a coaching program also takes the focus off individual classrooms and teachers. Clarifying that the coaches' role is supportive rather than supervisory avoids potential problems with the teachers' union and contract issues.

❖ **Coaching is one element of a professional development system, not the only answer.**

Coaching is no silver bullet. It can sustain professional learning and act as a bridge between school practice and broader district goals. However, for coaching to accomplish those ends, it must be explicitly linked to other professional development opportunities and broader components of systemic improvement such as small learning communities or districtwide frameworks. If coaching is the only form of professional learning, it runs the risk of creating isolated pockets of effective teaching and learning in individual schools, rather than supporting improvement both schoolwide and districtwide.

❖ **Coaching models are often not adapted well.**

Instructional coaching emerged in and is more commonly found in elementary schools. While certain elements of good practice hold true across the K–12 spectrum, trying to apply what worked in elementary schools will often undermine the work in secondary schools. Effective coaching recognizes and adapts to the structural, cultural, and instructional differences of different school levels. Key differences such as size, departmentalization, student load, and planning time affect the ways in which a coaching model can be implemented, supported, and assessed.

❖ **Whether voluntary or mandated, coaching can fail to reach resistant teachers.**

Instructional coaching goes beyond building awareness and knowledge to help sustain changes in practice. But in cases where participation in coached “cadres”

is voluntary, resistant teachers are able to opt out of the process. And in cases where participation is mandated, resistant teachers often feel resentment and develop no real ownership of the work. In both examples, the real benefit resides only with those teachers who most likely would have engaged in reflective, ongoing improvement efforts regardless of the structure within which it takes place.

❖ **School and central office supports are often underused or inaccessible.**

Central office supports for instruction and school-level efforts to improve instruction are often not consistently aligned and coordinated. While coaches can serve as liaisons between school and administration, clear routes of access to supports and communication of needs between central offices and schools remain ongoing challenges, particularly in large or decentralized districts.

❖ **Coaching programs often lack assessment indicators and systematic documentation of impact.**

As coaching is a relatively new approach to instructional capacity building, there is increasing demand for evidence that it improves teaching practice and increases student learning. Effective coaching structures use indicators to measure the changes in their practice and assess the effectiveness of their work. However, the time, knowledge, and investment required to systematically gather a range of evidence continue to be a challenge. The lack of documented examples of coaching allows districts to construct their own process and content, but these new models must then be tracked in order to share the lessons learned.

❖ **A focus on process limits the rigorous analysis of data and content.**

Just as rigorous instruction and high expectations are the goals for student experiences, the same holds true for the professional learning of coaches and the teaching teams with whom they work. “Process” activities such as collegial exchange and developing group processes and facilitation skills are highly valued and essential in coaching. But to be effective, the processes need to be grounded in content- and instruction-focused learning geared toward individual and organizational improvement through the use of evidence, research, and keen observation of practice.

❖ **Coaching often focuses on broad strategies to the exclusion of differentiation and equity.**

Coaching must move beyond a “universal best practices” approach to instruction in order to effectively deal with complex equity issues such as language diversity and special needs. For example, a literacy coach cannot simply help his or her teaching team learn a menu of “reading strategies,” but must also attend to the unique learning needs of English-language learners. These considerations hold true at the school, coaching, and district levels.

❖ **Teachers are typically the “learners,” but learning must occur at all levels.**

Instructional coaching is often focused – understandably so – at the school level and considered an issue between school administrators and school staffs. However, insufficient support or commitment not only from the school-level leadership, but also from district leadership, can derail even the best-laid plans. It is important to engage not only the school-level personnel who do the work, but also central office personnel to support and align the work across the district as well as community-based or other organizations knowledgeable about particular content-based issues.

The Institute’s Current Approach to Coaching

The Annenberg Institute typically works with communities of schools or entire districts to help them consider or support coaching in the belief that systemic change will yield both broader and more lasting improvements. Our observations have led us to think carefully about opportunities for refinement, unanswered questions, and ways to garner evidence to inform our work and learning as well as that of the districts with whom we work. We have developed some strategic approaches and a series of framing questions and themes that attempt to address the challenges and observations described above.

Strategies for Supporting Effective Coaching

❖ **Embed instructional coaching within professional development.**

Instruction is most visible at the school level, in interactions between teachers and students. But coaching, to be broadly effective, must permeate all levels of the district. Embedding instructional coaching in the district’s larger professional development system allows stakeholders at various levels of the system to engage in learning and allocate resources in coherent ways. Ideally, coaches are members of a districtwide team that seeks to improve the practice of all teachers and secure the central office supports required to sustain that practice.

For example, instructional coaches typically work with teams of teachers in one or two schools at a time. They serve as liaisons between teachers and administrators and between school and district, as well as serving as process facilitators and content experts, typically in math or literacy. They are ideally viewed as colleagues and allies rather than evaluators or administrators.

The varied demands of a coaching model illustrate the need for differentiated supports. Coaches themselves need professional learning opportunities to refine their practice, understand district initiatives and goals more deeply, and design their plans for their specific contexts. Teacher cadres also need professional development outside the scope of the coach to build broader group capacity and knowledge and focus on disciplinary areas within which the coaching model is

enacted. Finally, central office personnel need learning opportunities that help them understand the realities of current classroom practice, navigate the policy contexts within which they must guide school practitioners, and identify and align supports that are responsive to school needs and support district goals. And the system writ large needs clear pathways to document and disseminate the examples of excellent practice that teachers, coaches, or central office personnel find.

❖ **Assess existing practices and match needs with appropriate supports.**

We encourage districts considering or engaged in coaching to map existing learning networks, professional development opportunities, and central office policies and structures to determine whether coaching is an appropriate strategy to accomplish improvement goals and, if so, to identify coherent ways to support it.

For example, one large urban district determined that content-based coaching was an appropriate strategy because a large number of trained facilitators in the district provided an existing pool of personnel already competent in a core function of coaching. Another indicator of existing assets that could be used for coaching might be instances of collaborative practice – within schools and the district, or across roles (such as principals).

Mapping also helps identify possible misalignment between school practice and district policy or infrastructure, helping to target supports and align school and district communication more effectively.

❖ **Keep the focus on rigorous content-based experiences for teachers, coaches, and students.**

Since coaching is a relatively new practice, much attention has been given to creating the conditions necessary to implement coaching at the district and school levels. As coaching becomes more widespread, attention needs to shift to making sure coaching has a significant impact on teaching practice, and, ultimately, on student learning.

Structural and procedural elements such as release time, common planning time, materials and resources, and group processes are necessary but not sufficient conditions for the success of coaching. For coaching to make an impact, it must be wedded to specific, articulated gaps in content outcomes. We try to push school systems to move beyond collegial group processes and include content learning, data analysis, and approaches to documenting ongoing work in ways that will create greater capacity and internal accountability.

In addition, we support continuous professional learning for coaches that integrates district reform strategies, content knowledge, and approaches to effective adult learning. We also believe that a coherent system of professional development includes all stakeholders and is backed by a districtwide commitment of policy, supports, and people.

❖ **Think broadly about adding value and knowledge to coaching.**

We encourage districts to build collaborative, strategic relationships with diverse stakeholders to increase coaching capacity. Districts can establish both internal partnerships, by making support for coaching a systemwide endeavor, and external partnerships, by engaging organizations outside the system, to improve content knowledge or facilitation skills. The partnerships should exist vertically (school-district) and horizontally (across central office departments), as well as with universities, community organizations, and other civic institutions that might strengthen, broaden, and deepen the capacity of coaches and coaching structures to improve instruction and be more responsive to students.

Another important way to increase knowledge is to carefully observe the interplay between district-level conditions for coaching (a clearly articulated need and rationale, supports, and policies) and the school-level conditions of time, opportunity, and support. These observations can help generate the evidence required to refine coaching practices, make coaching more effective, and dramatically influence the culture of a school system to focus on results through shared ownership.

❖ **Document processes, content, and evidence of improvement.**

Documentation presents an ongoing challenge, particularly for teachers, whose time is already scarce. Documenting the work itself is daunting, let alone the impact, learning outcomes, changes in practice, and evidence of student learning. The volume of work that coaches and teachers must accomplish often leaves little time for capturing “homegrown” coaching models, adapting other coaching programs, and documenting lessons learned to inform future practice within and across systems. When given low priority, documentation can easily become a mass of disconnected reports, student work, and test scores that emphasizes quantity over quality.

We encourage districts to consider an array of ways to gather evidence and also to rethink how they allocate human resources to support documentation. Central office personnel can provide essential support to schools by generating data to inform teachers, schools, coaches, and the central office itself of key turning points or changes in practice.

❖ **Refine the coaching model in response to experience.**

Coaching holds promise for building instructional capacity, but there are still few concrete links to improved student outcomes (Poglinco et al. 2003). Until such evidence accumulates, existing practice and policy, as well as documentation of the local work and its impact, can be used as learning opportunities to refine the work in ways that address specific issues of a system or school. Understanding the policy climate and conditions for change of a system must inform the central offices, coaches, and school-level staff for coaching to be implemented reflectively.

For example, in many districts coaching first took hold at the elementary level, and the approach is being “scaled up” to high schools. However, we cannot assume that a first model will yield optimal results; it will require experimentation and adjustment. This is not to say that coaching should not be attempted in high schools because their cultures, needs, and supports are different from elementary schools. But a coaching model originating in elementary school and used in a high school setting must come with questions for reflection, refinement, and adjustment – and the commitment to make the necessary modifications required of a “first try.”

❖ **Seek locally appropriate approaches to issues of equity, opportunity, and differentiated instruction.**

To maintain an unwavering focus on improving student learning and achievement through building teacher capacity, we support districts’ efforts to construct an evidence-based coaching model that best serves local needs. Even within districts, the needs of a given community of teachers or a given school vary greatly; we recognize the importance of addressing those needs differently.

We encourage districts to consider their disaggregated data, the language and learning needs of their students, and the professional cultures of their schools when they examine instructional practices. In this way, school systems can develop differentiated learning and instructional strategies that more effectively support teachers and students than attempting to apply a “universal” set of best practices. For example, a school with a large number of English language learners (ELLs) likely calls for instructional strategies that specifically address language acquisition. A “universal best practices” approach would be insufficient to help teachers improve their practice to teach ELLs well and equitably.

Key Themes and Framing Questions

How might districts think about coaching as an element of improved teaching and learning? Who leads the work and how does it get done? Based on research, experience, and observation in a variety of urban districts, we believe that the best way to build a coaching system is by doing it – but doing it as a collective enterprise embedded in the larger district context, rather than as an isolated project.

To that end, we have developed some key themes to frame instructional coaching as an element of capacity building. We also include specific framing questions a district can ask as it considers or implements coaching. We encourage districts to add other relevant framing questions of their own.

❖ **Knowledge and ownership**

It is our belief that making the case for coaching is a critical element to its viability. Building knowledge in ways that include diverse stakeholders – all those who will feel the impact of the work – enhances the opportunity for real ownership of the work. School and central office staff will be more engaged if they have a

stake and a say in the reasons for the work, what it will look like in practice, and the kinds of results the system hopes it will yield.

Framing questions:

- What is your rationale for considering coaching?
- What questions or needs are you trying to address through coaching?
- What evidence have you gathered that these questions or needs are the right ones to address?
- What are the content areas (subjects or roles) for which you are considering coaching?
- Who are the key players in your system who will need to understand and “own” the concept of coaching? How will you go about “making the case” for them?
- What are your ideas for sharing responsibility, leadership, development, and credit?
- How do you imagine coaching might address issues of collaboration, culture, and collective capacity in your district?

❖ **Commitment and support**

A new initiative is only as good as the levels of commitment and support it receives over time. The commitment must be both in word and in practice, at multiple levels of the system. An important way to embed coaching throughout a system is to ensure that the superintendent, central office, and school leaders articulate similar messages about the purposes and expected outcomes of coaching. Systems must consider how they will provide specific human and fiscal resources, supports for learning and action, and time to engage in coaching effectively.

Framing questions:

- What, specifically, is the central office role in support of coaching?
- How will the central office demonstrate the system’s support of coaching?
- What is the district’s message about how coaching fits into the spectrum of reform efforts?
- How will you ensure an equitable allocation of resources, time, and staff?
- How will you help schools determine their needs and areas of focus? How will coaching address those areas?
- What kinds of professional learning opportunities will coaches, teachers, and district personnel be offered or lead to support coaching?
- How can the central office support coaching through technology and data systems?
- What practices are already in place at the central office to support instructional capacity building?

❖ **Personnel selection and support**

Coaching is made real by the leaders who enact it at the school level – the coaches. Districts that put careful thought into defining the role of coaches, selecting them, and ensuring their learning are helping their coaches to achieve the greatest success.

Because coaching is a relatively new approach to capacity building, many systems fall into traditional traps based on titles. For example, a given system’s reading specialists are often assumed to be the best pool for literacy coaches when, in fact, skills beyond a reading specialist credential may be essential. Thinking broadly about the content and adult learning needs of a district will widen the pool of potential coaches and create a more diverse range of expertise to guide the systemic work of coaching.

Framing questions:

- Where might your district look to find the most appropriate coaches?
- Where might your district look to find the staff to support coaching?
- What characteristics must coaches in your particular context have?
- What kinds of content knowledge or professional learning knowledge must coaches in your context have?
- What kinds of people are best positioned to have an impact on your system through coaching?
- How will you support the learning needs of the coaches?
- How will the selection process articulate and align with your system’s stated needs?

❖ **Planning action and measuring results**

The themes articulated above set the stage for coaching, but the actual work of enacting it throughout a school system requires a great deal of support, follow-through, and adjustment. It is not enough to define what coaching is. A system must tackle the questions of how coaches do their work, how central offices support coaching, how evidence from coaching is gathered and analyzed, and what ongoing refinements must be made to the practice.

Framing questions:

- What are the expected outcomes of coaching at the central office and school level for the first year of implementation? What about after two years?
- In what ways will the central office take responsibility for the work of coaching?
- How will coaches be evaluated and by whom?
- How will the central office support the documentation of the network of coaches and disseminate that information throughout the system?

- What will be the indicators of success for year one, year two, and so on?
- What examples of evidence-based documentation will help limit wide variance of coaching practice across the schools?
- What kinds of specific timelines and benchmarks throughout the school year will help guide the coaches' work, as well as the central office's support work?

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Table 2: Eight Powerful Practices and Keys to Success



OPTIMIZE TIME FOR STUDENT LEARNING	
	3 Keys to Success
1. Make Every Minute Count	<ul style="list-style-type: none"> Plan lessons to maximize time on task and student engagement Minimize non-instructional time Emphasize attendance
2. Prioritize Time According to Focused Learning Goals	<ul style="list-style-type: none"> Use data to identify priorities and goals Keep the focus on the goals Monitor progress towards goals
3. Individualize Learning Time and Instruction Based on Student Needs	<ul style="list-style-type: none"> Train teachers to leverage additional time for individualized instruction Use data to select, group, and re-group students for support Integrate and align academic supports to core instruction



USE TIME TO HELP STUDENTS THRIVE IN SCHOOL AND BEYOND	
	3 Keys to Success
4. Use Time to Build a School Culture of High Expectations and Mutual Accountability	<ul style="list-style-type: none"> Identify and consistently reinforce a small set of core values that are easy to remember Train and support staff in setting and reinforcing expectations Communicate expectations to parents
5. Use Time to Provide a Well-Rounded Education	<ul style="list-style-type: none"> Respond to student interests Start with exposure and offer opportunities for specialization and mastery Create partnerships that bring in outside expertise and leverage the skills and expertise of teachers
6. Use Time to Prepare Students for College and Career	<ul style="list-style-type: none"> Partner with colleges, businesses, and community organizations Build a school culture committed to college completion Support students who will be first-generation college students



DEDICATE TIME TO IMPROVE TEACHER EFFECTIVENESS	
	3 Keys to Success
7. Use Time to Continuously Strengthen Instruction	<ul style="list-style-type: none"> Provide teachers with frequent feedback and coaching Focus on a small set of improvement goals Create a culture that values feedback and continuous improvement
8. Use Time to Relentlessly Assess, Analyze, and Respond to Student Data	<ul style="list-style-type: none"> Build school-wide commitment to data use Provide teachers with tools that simplify real-time data analysis Create protocols that support teachers in planning around data use

INTERNAL REVENUE SERVICE
P. O. BOX 2508
CINCINNATI, OH 45201

DEPARTMENT OF THE TREASURY

Date: **AUG 21 2003**

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C/O JEFFREY S PIPER
1099 ALAKEA ST STE 1800
HONOLULU, HI 96813-0000

Employer Identification Number:
76-0717301
DLN:
17053091041043
Contact Person: ELIZABETH WAGNER ID# 31380
Contact Telephone Number:
(877) 829-5500
Accounting Period Ending:
June 30
Form 990 Required:
Yes
Addendum Applies:
Yes

Dear Applicant:

Based on information supplied, and assuming your operations will be as stated in your application for recognition of exemption, we have determined you are exempt from federal income tax under section 501(a) of the Internal Revenue Code as an organization described in section 501(c)(3).

We have further determined that you are not a private foundation within the meaning of section 509(a) of the Code, because you are an organization described in sections 509(a)(1) and 170(b)(1)(A)(ii).

If your sources of support, or your purposes, character, or method of operation change, please let us know so we can consider the effect of the change on your exempt status and foundation status. In the case of an amendment to your organizational document or bylaws, please send us a copy of the amended document or bylaws. Also, you should inform us of all changes in your name or address.

As of January 1, 1984, you are liable for taxes under the Federal Insurance Contributions Act (social security taxes) on remuneration of \$100 or more you pay to each of your employees during a calendar year. You are not liable for the tax imposed under the Federal Unemployment Tax Act (FUTA).

Since you are not a private foundation, you are not subject to the excise taxes under Chapter 42 of the Code. However, if you are involved in an excess benefit transaction, that transaction might be subject to the excise taxes of section 4958. Additionally, you are not automatically exempt from other federal excise taxes. If you have any questions about excise, employment, or other federal taxes, please contact your key district office.

Grantors and contributors may rely on this determination unless the Internal Revenue Service publishes notice to the contrary. However, if you lose your section 509(a)(1) status, a grantor or contributor may not rely on this determination if he or she was in part responsible for, or was aware of, the act or failure to act, or the substantial or material change on the

Letter 947 (DO/CG)

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part of the organization that resulted in your loss of such status, or if he or she acquired knowledge that the Internal Revenue Service had given notice that you would no longer be classified as a section 509(a)(1) organization.

Donors may deduct contributions to you as provided in section 170 of the Code. Bequests, legacies, devises, transfers, or gifts to you or for your use are deductible for federal estate and gift tax purposes if they meet the applicable provisions of Code sections 2055, 2106, and 2522.

Contribution deductions are allowable to donors only to the extent that their contributions are gifts, with no consideration received. Ticket purchases and similar payments in conjunction with fundraising events may not necessarily qualify as deductible contributions, depending on the circumstances. See Revenue Ruling 67-246, published in Cumulative Bulletin 1967-2, on page 104, which sets forth guidelines regarding the deductibility, as charitable contributions, of payments made by taxpayers for admission to or other participation in fundraising activities for charity.

In the heading of this letter we have indicated whether you must file Form 990, Return of Organization Exempt From Income Tax. If Yes is indicated, you are required to file Form 990 only if your gross receipts each year are normally more than \$25,000. However, if you receive a Form 990 package in the mail, please file the return even if you do not exceed the gross receipts test. If you are not required to file, simply attach the label provided, check the box in the heading to indicate that your annual gross receipts are normally \$25,000 or less, and sign the return.

If a return is required, it must be filed by the 15th day of the fifth month after the end of your annual accounting period. A penalty of \$20 a day is charged when a return is filed late, unless there is reasonable cause for the delay. However, the maximum penalty charged cannot exceed \$10,000 or 5 percent of your gross receipts for the year, whichever is less. For organizations with gross receipts exceeding \$1,000,000 in any year, the penalty is \$100 per day per return, unless there is reasonable cause for the delay. The maximum penalty for an organization with gross receipts exceeding \$1,000,000 shall not exceed \$50,000. This penalty may also be charged if a return is not complete, so be sure your return is complete before you file it.

You are required to make your annual information return, Form 990 or Form 990-EZ, available for public inspection for three years after the later of the due date of the return or the date the return is filed. You are also required to make available for public inspection your exemption application, any supporting documents, and your exemption letter. Copies of these documents are also required to be provided to any individual upon written or in person request without charge other than reasonable fees for copying and postage. You may fulfill this requirement by placing these documents on the Internet. Penalties may be imposed for failure to comply with these requirements. Additional information is available in Publication 557, Tax-Exempt Status for Your Organization, or you may call our toll free number shown above.

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You are not required to file federal income tax returns unless you are subject to the tax on unrelated business income under section 511 of the Code. If you are subject to this tax, you must file an income tax return on Form 990-T, Exempt Organization Business Income Tax Return. In this letter we are not determining whether any of your present or proposed activities are unrelated trade or business as defined in section 513 of the Code.

You need an employer identification number even if you have no employees. If an employer identification number was not entered on your application, a number will be assigned to you and you will be advised of it. Please use that number on all returns you file and in all correspondence with the Internal Revenue Service.

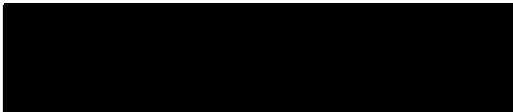
If we have indicated in the heading of this letter that an addendum applies, the enclosed addendum is an integral part of this letter.

Because this letter could help resolve any questions about your exempt status and foundation status, you should keep it in your permanent records.

We have sent a copy of this letter to your representative as indicated in your power of attorney.

If you have any questions, please contact the person whose name and telephone number are shown in the heading of this letter.

Sincerely yours,

A large black rectangular redaction box covering the signature of Lois G. Lerner.

Lois G. Lerner
Director, Exempt Organizations
Rulings and Agreements

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You are not subject to the specific publishing requirements of Revenue Procedure 75-50, 1975-2 C.B., page 587, as long as you are operating under a contract with the local government. If your method of operation changes to the extent that your charter is not approved, terminated, cancelled, or not renewed, you should notify us. You will also be required to comply with Revenue Procedure 75-50.

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Charitable Contributions - Substantiation and Disclosure Requirements

UNDER THE NEW LAW, CHARITIES WILL NEED TO PROVIDE NEW KINDS OF INFORMATION TO DONORS. Failure to do so may result in denial of deductions to donors and the imposition of penalties on charities.

Legislation signed into law by the President on August 10, 1993, contains a number of significant provisions affecting tax-exempt charitable organizations described in section 501(c)(3) of the Internal Revenue Code. These provisions include: (1) new substantiation requirements for donors, and (2) new public disclosure requirements for charities (with potential penalties for failing to comply). Additionally, charities should note that donors could be penalized by loss of the deduction if they fail to substantiate. **THE SUBSTANTIATION AND DISCLOSURE PROVISIONS APPLY TO CONTRIBUTIONS MADE AFTER DECEMBER 31, 1993.**

Charities need to familiarize themselves with these tax law changes in order to bring themselves into compliance. This Publication alerts you to the new provisions affecting tax-exempt charitable organizations. Set forth below are brief descriptions of the new law's key provisions. The Internal Revenue Service plans to provide further guidance in the near future.

Donor's Substantiation Requirements

Documenting Certain Charitable Contributions. — Beginning January 1, 1994, no deduction will be allowed under section 170 of the Internal Revenue Code for any charitable contribution of \$250 or more unless the donor has contemporaneous written substantiation from the charity. In cases where the charity has provided goods or services to the donor in exchange for making the contribution, this contemporaneous written acknowledgement must include a good faith estimate of the value of such goods or services. Thus, taxpayers may no longer rely solely on a cancelled check to substantiate a cash contribution of \$250 or more.

The substantiation must be "contemporaneous." That is, it must be obtained by the donor no later than the date the donor actually files a return for the tax year in which the contribution was made. If the return is filed after the due date or extended due date, then the substantiation must have been obtained by the due date or extended due date.

The responsibility for obtaining this substantiation lies with the donor, who must request it from the charity. The charity is not required to record or report this information to the IRS on behalf of donors.

The legislation provides that substantiation will not be required if, in accordance with regulations prescribed by the Secretary, the charity reports directly to the IRS the information required to be provided in the written substantiation. At present, there are no regulations establishing procedures for direct reporting by charities to the IRS of charitable contributions made in 1994. Consequently, charities and donors should be prepared to provide/obtain the described substantiation for 1994 contributions of \$250 or more.

There is no prescribed format for the written acknowledgement. For example, letters, postcards or computer-generated forms may be acceptable. The acknowledgement does not have to include the donor's social security or tax identification number. It must, however, provide sufficient information to substantiate the amount of the deductible contribution. The acknowledgement should note the amount of any cash contribution. However, if the donation is in the form of property, then the acknowledgement must describe, but need not value, such property. Valuation of the donated property is the responsibility of the donor.

The written substantiation should also note whether the donee organization provided any goods or services in consideration, in whole or in part, for the contribution and, if so, must provide a description and good-faith estimate of the value of the goods or services. In the new law these are referred to as "quid pro quo contributions."

Please note that there is a new law requiring charities to furnish disclosure statements to donors for such quid pro quo donations in excess of \$75. This is addressed in the next section regarding Disclosure By Charity.

If the goods or services consist entirely of intangible religious benefits, the statement should indicate this, but the statement need not describe or provide an estimate of the value of these benefits. "Intangible religious benefits" are also discussed in the following section on Disclosure By Charity. If, on the other hand, the donor received nothing in return for the contribution, the written substantiation must so state.

The present law remains in effect that, generally, if the value of an item or group of like items exceeds \$5,000, the donor must obtain a qualified appraisal and submit an appraisal summary with the return claiming the deduction.

The organization may either provide separate statements for each contribution of \$250 or more from a taxpayer, or furnish periodic statements substantiating contributions of \$250 or more.

Separate payments are regarded as independent contributions and are not aggregated for purposes of measuring the \$250 threshold. However, the Service is authorized to establish anti-abuse rules to prevent avoidance of the substantiation requirement by taxpayers writing separate smaller checks on the same date.

If donations are made through payroll deductions, the deduction from each paycheck is regarded as a separate payment.

A charity that knowingly provides false written substantiation to a donor may be subject to the penalties for aiding and abetting an understatement of tax liability under section 6701 of the Code.

Disclosure by Charity of Receipt of Quid Pro Quo Contribution

Beginning January 1, 1994, under new section 6115 of the Internal Revenue Code, a charitable organization must provide a written disclosure statement to donors who make a payment, described as a "quid pro quo contribution," in excess of \$75. This requirement is separate from the written substantiation required for deductibility purposes as discussed above. While, in certain circumstances, an organization may be able to meet both requirements with the same written document, an organization must be careful to satisfy the section 6115 written disclosure statement requirement in a timely manner because of the penalties involved.

A quid pro quo contribution is a payment made partly as a contribution and partly for goods or services provided to the donor by the charity. An example of a quid pro quo contribution is where the donor gives a charity \$100 in consideration for a concert ticket valued at \$40. In this example, \$60 would be deductible. Because the donor's payment (quid pro quo contribution) exceeds \$75, the disclosure statement must be furnished, even though the deductible amount does not exceed \$75.

Separate payments of \$75 or less made at different times of the year for separate fundraising events will not be aggregated for purposes of the \$75 threshold. However, the Service is authorized to develop anti-abuse rules to prevent avoidance of this disclosure requirement in situations such as the writing of multiple checks for the same transaction.

The required written disclosure statement must:

- (1) inform the donor that the amount of the contribution that is de-