

Minnesota Authorizer Performance Evaluation System (MAPES) Performance Report

Authorizer Information

Authorizer: Novation Education Opportunities

Authorizer Type: Single-Purpose

Evaluation Period: July 2015 to June 2020

Report Issue Date: June 12, 2020

Characteristics of the Authorizer

- Novation Education Opportunity's (NEO) authorizing mission, which fully aligns with Minnesota charter school statute, is to authorize and oversee charter schools through consistent, ongoing and robust evaluation to achieve significant and measurable student growth.
- NEO's authorizing vision is to be a leading Minnesota authorizer of innovative, diverse and effective charter schools. Diversity is evidenced by the wide variety of school models in its portfolio (e.g., classical education, STEM, Korean immersion).
- NEO's staffing model uses a combination of full-time and part-time staff members and independent contractors to fulfill its authorizing duties and responsibilities. Currently, NEO employs three staff members (equal to 2.5 full-time equivalent [FTE]) and 10 independent contractors (at .20 FTE each or 2.0 FTE). With the 4.5 FTE and 28 schools, NEO's staffing plan allows for a ratio of one FTE per 6.22 schools.

Overall Performance Rating

MAPES Overall Performance Rating for Novation Education Opportunities is 3.25 - Commendable

Ratings Summary

Performance Measures A: Authorizer Capacity and Infrastructure – 25 Percent Weight of Overall Rating

A.1: Authorizing Mission (2.5 percent)*	4
A.2: Authorizer Organizational Goals (1.25 percent)**	4
A.3: Authorizer Structure of Operations (2.5 percent)	4
A.4: Authorizing Staff Expertise (2.5 percent)	4
A.5: Authorizer Knowledge and Skill Development of Authorizing Leadership and Staff (2.5 percent)**	3
A.6: Authorizer Operational Budget for Authorizing the Portfolio of Charter Schools (2.5 percent)	4
A.7: Authorizer Operational Conflicts of Interest (2.5 percent)	4
A.8: Ensuring Autonomy of the Charter Schools in the Portfolio (2.5 percent)	2
A.9: Authorizer Self-Evaluation of Capacity, Infrastructure and Practices (1.25 percent)**	1
A.10: Authorizer High-Quality Authorizing Dissemination (1.25 percent)**	4
A.11: Authorizer Compliance to Responsibilities Stated in Statute (3.75 percent)	3
Total Performance Measures A Rating:	3.40

Performance Measures B: Authorizer Processes and Decision-Making – 75 Percent Weight of Overall Rating

B.1: New Charter School Decisions (11.25 percent)*	4
B.2: Interim Accountability Decisions (11.25 percent: 3.75 percent for expansion requests; 3.75 percent for ready to open standards; 3.75 percent for change in authorizers)	
Expansion Requests (3.75 percent)	3
Ready to Open Standards (3.75 percent)	3
Change in Authorizers (3.75 percent)	3
B.3: Contract Term, Negotiation and Execution (7.5 percent)	1
B.4: Performance Outcomes and Standards (11.25 percent)	3
B.5: Authorizer's Processes for Ongoing Oversight of the Portfolio of Charter Schools (7.5 percent)	4
B.6: Authorizer's Standards and Processes for Interventions, Corrective Action and Response to Complaints (3.75 percent)**	4
B.7: Charter School Support, Development and Technical Assistance (3.75 percent)**	4
B.8: High-Quality Charter School Replication and Dissemination of Best School Practices (3.75 percent)**	4
B.9: Charter School Renewal and Termination Decisions (15 percent)	3
Total Performance Measures B Rating:	3.20

**All percentages are presented in terms of overall weight*

***Continuous Improvement Measure*

Performance Measures A: Authorizer Capacity and Infrastructure

A.1 Measure: Authorizing Mission

Guiding Question: *Does the authorizer have a clear and compelling mission for charter school authorizing?*

Performance Level Rating: Level 4-Exemplary

Finding: The authorizer has a clear and compelling mission for charter school authorizing.

- In the commissioner-approved authorizing plan (AAP) Novation Education Opportunities (NEO) states that its mission is to “[a]uthorize and oversee charter schools through consistent, ongoing and robust evaluation to achieve significant and measurable student growth.” NEO’s mission fully aligns with Minnesota charter school statute. More specifically, NEO’s mission states that its purpose is to promote significant and measurable student growth, which aligns with Minnesota’s charter school statute to increase learning opportunities for all students.
- As shown in the narrative (and as verified in the authorizer interview), the authorizer identifies three tenets by which it carries out its mission for charter schools: 1) NEO approaches oversight and high-stakes decisions with consistency and transparency; 2) NEO monitors school performance on an ongoing basis; and 3) NEO brings robust resources and support to its schools through a competent and diverse board and staff. Additionally, these tenets are documented through annual reporting.
- NEO implements the mission from its AAP. NEO’s mission is included in board meeting minutes and the NEO annual reports, demonstrating that it is verified in internal practice and documentation. Additionally, a review of the board meeting minutes shows that the mission was discussed during meetings.
- During the authorizer interview, authorizing staff reiterated and verified NEO’s mission. Authorizing staff identified key words of the mission including “consistent”, “ongoing”, “robust” and “evaluation”, and stated that NEO’s overall goal is to improve all pupil learning and student achievement.
- An authorizer evaluation report of NEO conducted by the National Association of Charter School Authorizers (NACSA) in March 2019 demonstrates that the authorizer’s mission is verified by external references. In the report, NACSA recognizes NEO’s mission as a strength, indicating that NEO establishes a clear mission that aligns with the Minnesota Charter School Law.
- In the MAPES Cohort One Charter School Leadership Survey, 97 percent of respondents (n=35 total respondents) agreed or strongly agreed that they are familiar with the authorizer’s mission. During the school leader interviews, the authorizer’s mission was consistently verified externally by participants, who were able to articulate the authorizer’s mission statement.

Key Evidence:

- A.1 Narrative
- AAP
- NEO Board Meeting Minutes, November 2018
- FY 2016 Authorizer Annual Report – Novation Education Opportunities
- FY 2017 Authorizer Annual Report – Novation Education Opportunities
- FY 2018 Authorizer Annual Report – Novation Education Opportunities
- FY 2019 Authorizer Annual Report – Novation Education Opportunities
- NACSA Authorizer Evaluation Report, March 2019
- MAPES Cohort One Charter School Leadership Survey – NEO
- Authorizer interview, March 19, 2020
- Charter school leader interviews, April 7, 2020

A.2 Measure: Authorizer Organizational Goals

Guiding Question: *Does the authorizer have clear organizational goals and timeframes for achievement that are aligned with its authorizing mission and Minnesota charter school statute?*

Performance Level Rating: Level 4-Exemplary

Finding: The authorizer has clear organizational goals and timeframes for achievement that are aligned with its authorizing mission and Minnesota charter school statute.

- NEO has clear organizational goals, criteria and timeframes for achievement. The authorizer’s two goals, identified in the narrative, in the school’s business plan, as well as in the NEO annual reports, focus on improving the quality and increasing the quantity of seats available for all students. One goal is related to student achievement and the other is related to student growth. For example, one goal states, “At least 3,000 students collectively served by schools authorized by NEO will score meets or exceeds on grade level math, reading and science state assessments and graduate by FY 2020.” According to the narrative, the organizational goals were revised during strategic planning in 2016, with one goal being revised to include only state test scores instead of all scores in a high-performing school.
- The organizational goals listed in NEO’s AAP are also incorporated within its business plan, which, per NEO’s FY 2019 annual authorizer report, is implemented and discussed during monthly board meetings. For example, as previously mentioned, one organizational goal listed in the AAP is that NEO will measure and monitor the progress of NEO-authorized schools as measured by the percent of schools meeting academic indicators for growth and proficiency of all students and of No Child Left Behind (NCLB) focus groups of students (i.e., English Learner, special education and free/reduced price lunch), and financial health. It should be noted that despite the Every Student Succeeds Act (ESSA) replacing NCLB in 2015, NEO continued to reference NCLB focus groups in its FY 2019 annual report.
- NEO’s organizational goals align with its mission related to measuring and achieving significant and measurable student growth. For example, one goal states that collectively, the percent of all students exceeding projected growth scores will exceed 50 percent by 2020. The narrative states that goal achievement is based on the percent of scores that meet and exceed state growth targets.
- NEO is actively measuring progress on its organizational goals as evidenced in its annual authorizer reports. For example, one of NEO’s organizational goals centers on improving the performance of NEO’s portfolio of schools, and the FY 2018 annual authorizer report states, “In FY19 approximately 2,882 students scored meets or exceeds and graduated, compared to approximately 1,908 in FY14 (NEO’s baseline year)”, thus demonstrating that measurable progress was accomplished.
- In the narrative, NEO states that it regularly evaluates its work against its mission and organizational goals. For example, in 2019, NEO contracted with NACSA to evaluate its work in terms of its mission and organizational goals, and NACSA’s evaluation report states that NEO establishes organizational goals for student academic achievement. Additionally, the narrative states that the authorizer implements plans for improvement, as evidenced by the business plan, which lists strategies for meeting goals through work in three primary categories: 1) start high-quality schools; 2) support improvement of operational schools; and 3) expand high-quality schools and effective practices. The annual authorizer reports also identify these strategies as part of NEO’s five-year strategic plan, and report on NEO’s efforts in achieving the goals. For example, NEO’s FY 2019 annual authorizer report indicates that NEO discussed the implementation of the business plan (which includes organizational goals and strategies for improvement) on a monthly basis.

Key Evidence:

- A.2 Narrative
- AAP
- NEO Business Plan
- Charities Review Council Governance Award Documentation
- NEO Board Meeting Minutes, November 2018
- FY 2016 Authorizer Annual Report – Novation Education Opportunities
- FY 2017 Authorizer Annual Report – Novation Education Opportunities
- FY 2018 Authorizer Annual Report – Novation Education Opportunities
- FY 2019 Authorizer Annual Report – Novation Education Opportunities
- NACSA Authorizer Evaluation Report, September 2014
- NACSA Authorizer Evaluation Report, March 2019
- Completed NEO Board Effectiveness Surveys
- MDE High-Quality Schools List
- 2015 NEO Final MAPES report
- Authorizer interview, March 19, 2020

A.3 Measure: Authorizer Structure of Operations

Guiding Question: *To what degree does the authorizer operate with a clear structure of duties and responsibilities and sufficient resources to effectively oversee its portfolio of charter schools?*

Performance Level Rating: Level 4-Exemplary

Finding: The authorizer consistently operates with a clear structure of duties and responsibilities and sufficient resources to effectively oversee its portfolio of charter schools.

- NEO's AAP and organizational chart defines a clear structure of duties and responsibilities that meets the needs of the portfolio of charter schools. For example, the executive director oversees the day-to-day operations of the authorizing office and makes recommendations regarding new schools, readiness to open, expansion, contract renewal, termination and amendments, while the board makes final decisions based on the executive director's recommendations. Additionally, the executive director oversees the NEO advisors (i.e., independent contractors) and systems analysts. Currently, NEO employs three staff members (equal to 2.5 FTE) and ten advisors (at .20 FTE each or 2.0 FTE total) to serve the eight pre-operational and 20 operational charter schools. This staffing plan allows for a ratio of nearly one FTE per six (6.22) schools, which meets the needs of the portfolio. It should be noted that although NEO references 27 schools, there are 28 schools with existing contracts within the NEO portfolio. Furthermore, while the business plan within the AAP indicates NEO would have 4 FTE of employed staff (i.e., executive director and three additional FTE positions) by FY 2020, during the interview the authorizer explained that it has allocated resources most effectively by contracting with consultants.
- In the narrative, NEO states that the structure of duties and responsibilities has been updated when necessary over the authorizer term. For example, as cited in the FY 2017 annual report, the position of information support specialist was developed and filled to coordinate communication with the authorized schools, in order to develop and maintain each school's performance framework. NEO adds that it will continue to increase its network of advisors based on its needs in areas such as application reviews, progress and compliance monitoring, site visits, technical assistance, etc.
- NEO's data sharing agreement with its staff, schools and contractors demonstrates appropriate management, retention and safeguarding of school and student information and records relating to authorizing. For example, NEO indicates that the purpose of the data sharing agreement is to "clearly document what data are being shared and how that data can be used," and to prevent miscommunication about the data. Additionally, signed data-sharing agreements dated between 2016 and 2019 show that NEO has implemented them as part of their practice over the authorizer term to date. Furthermore, letters from five current staff members and advisors affirm that NEO has advisors complete annual paperwork related to data-sharing agreements.
- During the authorizer interview, NEO authorizing staff indicated that during the authorizer term, the structure of duties, responsibilities and staffing levels have been sufficient. For example, they stated that over the authorizer term to date, they have used a mix of full-time employees and advisors in order to fulfill all of their authorizing duties. Additionally, authorizing staff described how duties are distributed among full-time staff and part-time advisors (e.g., one systems analyst focuses more on performance data and managing Epicenter, while the other systems analyst is more focused on operations and managing Basecamp), demonstrating how NEO fulfills all of its authorizing duties. Furthermore, review of the annual task survey finds that it outlines various authorizing responsibilities coded by MAPES. For example, one item on the survey is coded as B.1 and has specific NEO advisors identified as leading the completion of a rigorous, streamlined applicant review process.

- Over the authorizer term to date, NEO has operated with a clear structure of duties and responsibilities that is sufficient to effectively oversee its portfolio of charter schools. In addition to evidence included above, NEO, as cited in the FY2019 annual report, developed and hired the position of systems analyst to coordinate the communication with the authorized schools to develop and maintain each school's performance framework and on-time, accurate document submission.
- In the MAPES Cohort One Charter School Leadership Survey, 94 percent of respondents agreed or strongly agreed that the staffing level of NEO is sufficient to meet the needs of their school. During the school leader interviews, all participants indicated that they believe NEO has sufficient capacity to manage the portfolio. For example, participants stated that NEO always responds to their questions and is willing to meet with them. They also indicated that they have regular contact with NEO staff and advisors through multiple means such as meetings, site visits, board observations, etc. Additionally, in the school leader interviews, participants outlined the roles and responsibilities of NEO staff and advisors (e.g., finance analyst provides financial support), demonstrating a clear structure of duties.

Key Evidence:

- A.3 Narrative
- AAA/AAP
- NEO Organizational Chart
- NEO Job Descriptions
- NEO Data Sharing Agreements
- NEO Annual Task Survey
- MAPES Cohort One Charter School Leadership Survey – NEO
- Authorizer interview, March 19, 2020
- Charter school leader interviews, April 7, 2020

A.4 Measure: Authorizing Staff Expertise

Guiding Question: *To what degree does the authorizer have appropriate experience, expertise and skills to sufficiently oversee the portfolio of charter schools?*

Performance Level Rating: Level 4-Exemplary

Finding: Authorizer staff and advisors consistently demonstrate the appropriate experience, expertise and skills to sufficiently oversee the portfolio of charter schools.

- Resumes and a table documenting each staff member's years of experience show that over the authorizing term, authorizing staff (including five NEO board members, three staff members and ten advisors) have appropriate experience, expertise and skills in charter school academics, finance, operations and law. For example, one staff member serves as general counsel and has a Juris Doctor, while other members have extensive education, operations and financial experience (e.g., executive director, school principal, education advisor, financial analyst). Other advisors include a former teacher, professor, principal, director, superintendent and current financial analyst who was a founding member of several charter boards; a former charter school principal who holds a K-12 principal license; as well as a school executive director with experience in operations, facilities, finances and administration. In addition, in the narrative, NEO states that it contracts for financial services with The Anton Group.
- Authorizing staff are sufficient for the oversight of the portfolio of charter schools. There is one full-time executive director and two systems analysts (one full-time, one part-time), along with ten advisors to support the academic, financial and operational oversight of NEO's portfolio of schools. For example, one systems analyst is responsible for the performance framework that NEO and the authorized schools use to monitor and evaluate progress towards contract goals and maintaining Epicenter; the other systems analyst is responsible for maintaining Basecamp and for developing and maintaining NEO's internal website. Finally, the agreements with advisors identify duties such as site visits, desktop application review and board meeting observations, and each consultant must represent that they are qualified to provide the contracted services.
- Review of NACSA's 2019 evaluation report on NEO finds that it aligns with nationally recognized quality authorizing standards. For example, NACSA states that "NEO implements a unique and resourceful staffing strategy: a team of part-time contracted advisors perform NEO's key authorizing duties, including application reviews, monitoring, and renewal reviews. Using advisors is a cost-effective way to engage substantial professional expertise that would not be affordable or accessible to the organization on a full-time basis."
- A review of staff and advisors' credentials provided in resumes and the table documenting staff experience demonstrates that staff has held experience, expertise and skills in charter school academics, finance, operations and law over the authorizer term to date. For example, the executive director has been involved with charter schools since 2002, while an assessment specialist has served as a NEO consultant since 2012 and holds experience with new school applicant evaluations and monitoring and evaluation of charter schools. Another consultant has engaged with charter schools since 1998 and has served as a finance specialist and as a turnaround manager supporting schools as they recover from operating in debt. Five authorizing staff and advisors have collectively worked for NEO for 30 years. One advisor holds a superintendent license and a doctorate in education administration, and others hold a school principal license, an MBA and a Juris Doctor. In addition, NEO contracts for financial services (e.g., accounting, payroll) with The Anton Group.

Key Evidence:

- A.4 Narrative
- AAP
- NEO Advisors and Staff Resumes
- NEO Board of Directors Resumes
- Documentation of Years of Experience
- NACSA authorizer evaluation report, March 2019
- Authorizer interview, March 19, 2020

A.5 Measure: Authorizer Knowledge and Skill Development of Authorizing Leadership and Staff

Guiding Questions: *To what degree does the authorizer build the knowledge and skill base of its authorizing leadership and staff through professional development? Is professional development aligned with the authorizer's operations, mission and goals for overseeing its portfolio of charter schools?*

Performance Level Rating: Level 3-Commendable

Finding: The authorizer regularly builds the knowledge and skill base of its authorizing leadership and staff through professional development that is aligned with its operations, mission and goals for overseeing its portfolio of charter schools.

- In the AAP, NEO states that authorizing leadership and staff will regularly participate in professional development (PD) in order to improve their expertise and skill base. For example, it states that NEO will participate annually in the NACSA Leadership Conferences and MDE charter-related workshops and trainings. Additionally, review of the professional development plan, which covers trainings throughout the authorizer term, affirms attendance at the NACSA Leadership Conference and other NACSA events (e.g., NACSA workshop, Beyond Buzzwords: Balancing Autonomy with Equity in Access in January 2018) each year, demonstrating that PD is intentional. NEO staff also participate in MDE trainings. Topics are related to authorizing and align with authorizer operations, including contract reviews and new school affidavit reviews, and build the knowledge and skill base of authorizer leadership and staff. Furthermore, NEO's proposed FY 2020 budget also demonstrates that it allocates funds to build authorizer capacity and skill development (by attending conferences organized by NACSA and the Minnesota Association of Charter School Authorizers [MACSA] and NEO cross-training and professional development). Annual reports between FY 2016 and FY 2019 state that NEO staff regularly attended NACSA conferences, MACSA meetings and MDE trainings. Finally, while the narrative makes reference to, and a screenshot of the Minnesota Charter Board website shows, NEO staff and advisors having completed more than 25 short courses (e.g., financial oversight, school leadership evaluation, internal controls), it should be noted that NEO is currently in the process of developing this training as part of the Charter School Program Board Development Grant, and it is still in its pilot stage.
- As previously mentioned, in the AAP, NEO states that professional development is required of authorizing leadership and staff in order to improve their expertise and skill base, which aligns with NEO's operations, mission and organizational goals for overseeing its portfolio of charter schools. For instance, NEO's professional development plan, which covers trainings over the authorizer term, shows that authorizing leadership and staff participated in trainings related to oversight, and part of NEO's mission is to "oversee charter schools through consistent, ongoing and robust evaluation." Additionally, staff participated in a 2019 Northwest Evaluation Association's (NWEA) virtual training on analyzing NWEA results in alignment with school performance framework goals; MDE's 2018 Authorizer Conference, where topics included data analysis and performance tracking standards; and, the National Charter Schools Conference, with topics including authentic ways to measure student outcomes and how to support schools that are struggling.
- Professional development attended is sufficient to fulfill professional development commitments defined in the AAP. For example, the AAP states that NEO will participate in the NACSA Leadership Conferences and MDE charter related workshops and trainings, as well as regularly participate in MACSA events. Review of NEO's professional development plan shows, over multiple years, authorizing leadership and staff attended the NACSA Leadership Conference, the National Charter Schools Conference, and the MDE Authorizer Conference, among others.

- Review of NEO's professional development plan shows that professional development is ongoing and occurs more than once a year for all authorizing leadership and staff over the authorizer term. For example, as stated above, authorizing leadership and staff attended the NACSA Leadership Conference, the National Charter Schools Conference, the MDE Authorizer Conference and Minnesota Charter Board Training and Development Project sessions, over multiple years.
- In the narrative and the authorizer interview, NEO states that professional development is customized for authorizing leadership and staff. For example, authorizing leadership and staff determine which sessions to attend at conferences (e.g., NACSA Leadership Conference) based on applicability to individual staff needs in terms of development. During the interview, NEO authorizing staff explained that conference sessions were selected based on topics directly related to their role (e.g., an analyst participated in sessions around analytics and data management).
- While the professional development plan demonstrates that the authorizing leadership and staff regularly attend professional development sessions, it is not clear whether or how these sessions are measured and evaluated. For example, an email from NEO's executive director to NEO advisors, dated September 3, 2019, outlines a meeting agenda that includes items such as advisors selecting online training courses and providing feedback by completing end-of-course survey items. However, while documentation (such as survey responses collected at the end of the grant project course that was taken at NEO's FY 2020 kick-off meeting on September 4, 2019) was provided to demonstrate that the feedback was collected, no evidence was provided to show authorizer-specific professional development is measured or evaluated. In addition, according to the authorizer (this was also verified by survey results), the NEO End of Annual Training school leader survey is used to plan training and evaluate professional development. However, the survey is specific to professional development for schools, and not the authorizer. The authorizer received a Charter School Program Authorizer (CSP) grant in FY 2018. According to the reimbursement form, NEO staff used grant funding to attend the NACSA conference in 2019. Within the reimbursement form, when asked to reflect on its capacity to support high-quality charter schools, the authorizer only listed sessions that staff attended, but did not provide documentation to show how attendees measured or evaluated the professional development sessions.

Key Evidence:

- A.5 Narrative
- AAP
- Email (September 3, 2019) from NEO executive director to NEO advisors
- NEO Professional Development Plan
- NEO End of Annual Training Survey
- FY 2016 Authorizer Annual Report – Novation Education Opportunities
- FY 2017 Authorizer Annual Report – Novation Education Opportunities
- FY 2018 Authorizer Annual Report – Novation Education Opportunities
- FY 2019 Authorizer Annual Report – Novation Education Opportunities
- NEO CSP Authorizer Grant
- 19.02-18 Revised Authorizer Training Reimbursement Request Fillable Signed
- Part 1 Professional Development
- Authorizer interview, March 19, 2020

A.6 Measure: Authorizer Operational Budget for Authorizing the Portfolio of Charter Schools

Guiding Question: *To what degree is the authorizer's actual resource allocation commensurate with its stated budget, and the needs and responsibilities of authorizing the portfolio of charter schools?*

Performance Level Rating: Level 4-Exemplary

Finding: The authorizer's actual resource allocation is consistently commensurate with its stated budget, and the needs and responsibilities of authorizing the portfolio of charter schools.

- The AAP states that NEO will maintain a staffing ratio of one full-time employee per seven schools, and allocate \$40,000-\$50,000 in Years One, Four and Five for additional staff capacity (full-time, part-time and/or advisors). NEO currently maintains a staffing ratio of one FTE per 6.22 schools, which exceeds the resources to portfolio size ratio it committed to in its AAP. Additionally, during the authorizer interview, authorizing staff indicated that a systems analyst was hired in FY 2017, and review of NEO's authorizing budgets from FY 2015 through FY 2020 shows that additional funding for staffing was allocated in FY 2017, FY 2019 and FY 2020.
- In the narrative, NEO states that resource allocations are sufficient to fulfill authorizing responsibilities and are commensurate with the needs and scale of its portfolio. NEO adds that it currently employs 2.5 full-time employees and approximately 10 advisors (at 2.0 total FTE) to support 20 operational schools and eight pre-operational schools in its portfolio. Review of the proposed FY 2020 budget shows NEO allocates resources with attention to portfolio size, including number of operational schools, number of seats and pupil units. For example, an additional \$5,000 was allocated to ongoing oversight (including Epicenter, board meeting observations and formal site visits) in FY 2020 with an estimated increase of two operational schools. Additionally, a sample invoice template for one independent contractor was provided to demonstrate that, when allocating work to advisors, NEO uses a coding system to align their resource allocation with MAPES standards. The budget documents (which cover the authorizer term) and the pie chart within the board packet for the May 21, 2019 board meeting also show that NEO aligns allocations with MAPES standards using this coding system. For example, the budget shows that in FY 2019 \$15,000 was allocated to MAPES B.2 (monitoring new school readiness) and the pie chart shows 28 percent of the funds are allocated to B.5 (ongoing monitoring).
- NEO has adjusted its staffing in relation to its portfolio size. NEO defines a goal in its business plan around effectively allocating human resources to ensure ongoing, consistent and robust evaluation of charter schools. Review of the budget documents (which cover the authorizer term) finds that there was an increase in funding allocated to staffing in FY 2017, FY 2019 and FY 2020 in anticipation of opening additional schools, demonstrating that authorizer staff changes occurred in relation to portfolio size. For example, as previously mentioned, during the authorizer interview, authorizing staff reported that a systems analyst was hired in FY 2017. Additionally, in the FY 2017 budget, NEO budgeted \$875.00 to fulfill B.2 (interim accountability decision tasks), and in FY 2020, they propose allocating \$20,000 to this task (e.g., monitoring new school readiness to open, expansion for pre-K and expansions for site and grade level) as the portfolio size grew from 18 schools to 28 schools.
- In the narrative, NEO describes how its resource allocations (specifically around human resources) align with nationally recognized quality authorizing standards. More specifically, the authorizer aligns its own practices with the specific NACSA Standards and Principle #1: to enlist expertise and competent leadership for all areas essential to charter school oversight—including, but not limited to, education leadership; curriculum, instruction and assessment; special education, English learners and other diverse learning needs; performance management and accountability; law; finance; facilities; and nonprofit governance and management—through staff, contractual relationships and/or intra- or inter-agency collaborations.

- Over the authorizer term to date, NEO has provided evidence to demonstrate that its actual resource allocation is commensurate with its stated budget, and the needs and responsibilities of authorizing the portfolio of charter schools.
- NEO allocates resources to achieve nationally recognized quality authorizing standards and revises its budgets as necessary. According to the narrative as well as a review of budget documents and board meeting packets, NEO codes resource allocations to specific authorizing responsibilities/duties using the MAPES coding (which are aligned to nationally recognized quality authorizing standards) to ensure that resource allocations are sufficient to fulfill authorizing responsibilities and are commensurate with the needs and scale of the authorized schools (e.g., income, expenditures and number and size of the charter schools in the portfolio). For example, in the interview, the authorizer stated that the board reviews work performed and determines priorities to allocate resources accordingly. The pie chart in the board meeting packet delineates how funds are allocated to each authorizing responsibility (such as 28 percent for ongoing monitoring [B.5], 12 percent for dissemination of best school practices [B.8] and 17 percent for authorizer capacity and development [A.5]).

Key Evidence:

- A.6 Narrative
- AAP
- NEO Authorizing Budget Documents (FY2015-20)
- NEO Advisor Invoice Template
- NACSA Principles and Standards, 2018 edition
- NEO Board Meeting Minutes, May 2019
- Authorizer interview, March 19, 2020

A.7 Measure: Authorizer Operational Conflicts of Interest

Guiding Question: *To what degree does the authorizer implement a clear policy to address conflicts of interest in all decision making processes concerning the portfolio of charter schools?*

Performance Level Rating: Level 4-Exemplary

Finding: The authorizer consistently implements a clear policy to address conflicts of interest in all decision-making processes concerning the portfolio of charter schools.

- The AAP and NEO's conflict of interest and school autonomy policy (adopted in May 2012 and revised in October 2018) demonstrates that a clear conflict of interest policy for authorizing exists. The policy states that persons with any actual or perceived conflict of interest shall disclose the same and are excluded from deliberation and voting to ensure that they have no influence over the corporation regarding the compensation for, or business deals of, themselves or related persons.
- NEO follows the policy as outlined in the AAP. According to the AAP, NEO requires each board member, employee, and independent contractor to sign a statement of assurances that he or she has read NEO's conflict of interest policy. The narrative states that the policy is intentionally implemented as each staff member, including independent contractors and board members, is required annually to sign a statement of assurance that they have read the conflict of interest policy. Review of NEO conflict of interest forms demonstrate that board members, employees and independent contractors annually sign a conflict of interest form as set forth in the AAP. In the MAPES Cohort One Charter School Leadership Survey, 68 percent of respondents stated that they were not aware of violations of the conflict of interest policy made by the authorizer, while 32 percent stated that they were aware of a violation. Additionally, 91 percent responded that they have not experienced an authorizer conflict of interest, while 9 percent of respondents replied they had.
- NEO's decision-making is transparent. NEO's conflict of interest and school autonomy policy states that persons with any actual or perceived conflict of interest shall disclose the same and are excluded from deliberation and voting to ensure that they have no influence over the corporation regarding the compensation for, or business deals of themselves or of related persons. Furthermore, in the AAP, NEO explains how the policy will be implemented; they state, at the beginning of each NEO board meeting, board members review the agenda and indicate if there are any agenda items with which they may have a conflict of interest in order to recuse themselves from discussion and/or vote if a real or perceived conflict exists. A review of NEO board meeting minutes from January 2018 and November 2018 finds that there is a standing agenda item for board members to declare any conflicts of interest. The January 2018 board meeting minutes show that two conflicts of interest were declared at the meeting and as a result, both of the affected members abstained from the vote on the approval of a contract for a new school application. It should be noted that MDE received a complaint in 2019 from one of the pre-operational schools within NEO's portfolio explaining that the authorizer had, in their opinion, interfered in the school's operations as a result of a conflict of interest regarding another school in the authorizer's portfolio. A letter dated December 4, 2019 from MDE to NEO's Board Chair states that there is a perception that NEO favored one of its existing schools. The letter points to an email dated April 2, 2019 from NEO's director to the school that "appears to suggest" that the authorizer would withhold approval of the pre-operational school if it impacted the existing school.
- According to review of the signed conflict of interest forms, NEO requires staff to disclose conflicts between reviewers and applicants to ensure that application review and decision-making processes are free of conflicts of interest. Furthermore, the January 2018 board meeting minutes show a board member abstained from the vote on the approval of a new contract given a perceived conflict of interest.

- As stated above, in the MAPES Cohort One Charter School Leadership Survey, 68 percent of respondents responded that they were not aware of violations of the conflict of interest policy made by the authorizer while 32 percent of respondents replied they were aware of violations of the conflict of interest policy made by the authorizer. In addition, 91 percent of respondents indicated they have not experienced an authorizer's conflict of interest while 9 percent of respondents replied they had. As a follow up to the survey, during the school leader interview, participants were asked to describe how the authorizer avoids conflict of interest. Several respondents stated that NEO has a conflict of interest policy and explained that NEO reviews the policy with its consultants to ensure consultants do not have a conflict with schools. In the case of a conflict, the consultant does not work with that school. In addition, respondents stated that NEO's conflict of interest policy is driven by integrity; and NEO does not cross any boundaries.

Key Evidence:

- A.7 Narrative
- AAP
- NEO Signed Conflict of Interest Forms
- NEO Conflict of Interest Policy
- NEO Board Meeting Minutes (January 2018 and November 2018)
- NEO Annual Advisor Meetings and HR (conflict of interest) Training Agendas (SY2015-19)
- MAPES Cohort One Charter School Leadership Survey - NEO
- 19.12-04 MDE Letter to NEO
- Authorizer interview, March 19, 2020
- Charter school leader interviews, April 7, 2020

A.8 Measure: Ensuring Autonomy of the Charter Schools in the Portfolio

Guiding Question: *To what degree does the authorizer preserve and support the essential autonomies of the portfolio of charter schools?*

Performance Level Rating: Level 2-Satisfactory

Finding: The authorizer preserves and supports the essential autonomies of the portfolio of charter schools.

- NEO has a clear policy to ensure school autonomy, stating that it provides monitoring and oversight to its schools, but does not operate them. During the authorizer interview, authorizing staff stated that NEO is very clear with staff and advisors about what it means to “stay in their lane.” For example, they explained that learning walks are used to facilitate discussion around a school’s strengths and areas for improvement related to the performance framework, but not for NEO to dictate what the school should do. As confirmed by review of NEO’s authorizer map, key elements of the learning walk include a focus on non-evaluative “noticings” and “wonderings”.
- In addition to not operating its schools, NEO’s policy indicates that NEO will not contract with schools for the following services: financial management; administration; accounting or auditing services; or lease of space, thus leaving the day-to-day operations to the schools. Additionally, section 10.2 of NEO’s school contract articulates the independent status of the school, stating, “The Authorizer has no authority, control, power, or administrative or financial responsibility over the School.” Furthermore, during the interview, the authorizer provided an example to detail how their method for oversight purposefully respects autonomy over the school’s day-to-day operations, explaining that learning walks include “noticings” and “wonderings” to facilitate discussion and data meetings around strengths and areas for improvement. Finally, as stated in the authorizer map, staff are provided with step-by-step guidance for each authorizer action to ensure consistency; NEO staff follow the same oversight procedures.
- NEO’s practices align with its policy. Per the AAP, the performance framework is central to decision-making and holds schools accountable for outcomes rather than on processes. As articulated in section 3.2(d) of NEO’s school contract, the school and authorizer agree that the school’s operation shall be measured by the school performance indicators set forth in the agreement, including academic outcomes for individual students and for the school as a whole, and standards for governance (including compliance), financial management and school operation. It should be noted that MDE received a complaint in 2019 from one of the pre-operational schools within NEO’s portfolio explaining that the authorizer had, in their opinion, interfered in the school’s operations as it relates to the planned location of their school as well as the choice of school leader. A letter from MDE in December 2019 communicates MDE’s concern regarding NEO’s preservation of the school board’s autonomy for duties related to operating the school, including policy matters related to school personnel. The letter states, “While NEO is charged with oversight of the school’s operations and performance, NEO must respect and ensure appropriate school board decision-making authority.” In the Charter School Leadership Survey, 85 percent of respondents agree or strongly agree that NEO preserves the school board’s autonomy over policy related to operating the school and 9 percent strongly disagree. During the school leader interviews, all participants stated that NEO preserves the school board’s autonomy over policy related to operating the school. For example, they indicated that when they approach NEO with a school-level issue or question, NEO provides guidance and suggestions but does not dictate what the school should do.

- In the narrative, NEO states their policy aligns with nationally recognized quality authorizing standards as articulated in the NACSA Principles and Standards (2018 Edition). More specifically, NEO identifies NACSA's principle and standard that, "[a] quality authorizer conducts contract oversight that competently evaluates performance and monitors compliance; ensures schools' legally entitled autonomy; protects student rights; informs intervention, revocation and renewal decisions; and provides annual public reports on school performance," and indicates that its contract includes all of these pieces (e.g., a comprehensive performance framework; assurance of autonomy). NEO provides additional discussion to explain how NEO's autonomy policy and practices align with five NACSA principles. For example, NEO states that they utilize Epicenter to alert schools to upcoming due dates and submissions expectations; and, therefore, in alignment with NACSA standards, clearly communicates to schools the process, methods and timing of gathering and reporting school performance and compliance. However, while NEO provided contract language and a copy of the new school affidavit to demonstrate that facility related pre-opening decisions were made without overstepping the school's autonomy, it did not submit documentation to show that it did not overstep the authority vested in the charter school board to choose a school leader. Thus, NEO did not ensure the school's legally entitled autonomy, as aligned with NACSA principles and standards.

Key Evidence:

- A.8 Narrative
- AAP
- NEO Conflict of Interest and School Autonomy Policy
- NEO Authorizer Map
- NEO School Contracts
- MAPES Cohort One Charter School Leadership Survey – NEO
- 19.12-04 MDE Letter to NEO
- Authorizer interview, March 19, 2020
- Charter school leader interviews, April 7, 2020
- Authorizer Review and Comment Submission Form 20.5-22 Revised

A.9 Measure: Authorizer Self-Evaluation of Capacity, Infrastructure and Practices

Guiding Question: *To what degree does the authorizer self-evaluate its internal ability (capacity, infrastructure and practices) to oversee the portfolio of charter schools?*

Performance Level Rating: Level 1: Approaching Satisfactory

Finding: The authorizer does not regularly self-evaluate its internal ability to oversee the portfolio of charter schools.

- According to the narrative, NEO regularly evaluates its internal ability to oversee the portfolio of charter schools through the use of an intervention dashboard that monitors its schools' performance. Through the intervention dashboard, NEO identifies schools that are not meeting expectations and uses this to evaluate and adjust the level of monitoring and oversight that it provides in order to support the schools' improvement. Additionally, review of NEO's self-evaluation document (that was completed as part of NACSA's 2019 evaluation), as well as a completed board effectiveness survey and NEO board meeting minutes in 2015, 2017, and 2018, show that NEO evaluates its internal ability. For example, the authorizer self-evaluation form (that was completed as part of NACSA's 2019 evaluation) asks the authorizer to reflect on practices by stating whether they agree or disagree with statements (e.g., we consistently monitor schools' academic, organization and financial performance; and, we encourage the expansion of high-quality schools). Furthermore, as part of the process for achieving the Meets Standards Seal from the Charities Review Council (CRC), NEO's board had to complete a board effectiveness survey that asks members to assign a rank (from one to five) for the board's handling of a variety of issues (e.g., board orientation; goal setting and strategic planning; evaluation; financial management); however, review of the survey shows that it is undated, and it is not clear who completed the survey. Similarly, NEO board meeting minutes in 2015, 2017, and 2018 include action items around the approval of revised policies based on the board effectiveness survey they completed as part of CRC's process to earn the Meets Standards Seal. However, sufficient evidence was not provided to demonstrate that they conducted self-evaluations on a regular (i.e., annual) basis over the review term. During the interview, the authorizer stated that the board effectiveness survey results, as well as feedback collected from school leader surveys following NEO's annual Celebrations of Learning, are used by authorizer staff to identify areas of improvement. Additionally, the authorizer annual reports indicate that NEO holds monthly board meetings to monitor capacity, infrastructure, and practices including implementation of NEO's Business Plan; however, insufficient evidence was provided to verify that the monitoring is occurring monthly. Finally, while NEO stated that the board used the process of engaging the Charities Review Council and NACSA for the purpose of improvement, there is no evidence that NEO develops improvement plans.

Key Evidence:

- A.9 Narrative
- AAP
- NEO Business Plan
- NACSA Authorizer Evaluation Report, September 2014
- NACSA Authorizer Evaluation Report, March 2019
- FY 2016 Authorizer Annual Report – Novation Education Opportunities
- FY 2017 Authorizer Annual Report – Novation Education Opportunities
- FY 2018 Authorizer Annual Report – Novation Education Opportunities
- FY 2019 Authorizer Annual Report – Novation Education Opportunities
- NEO Self-Evaluation, Exhibit 2
- Emails from NEO leadership to NEO board members and school leaders, 2015
- Completed NEO Board Effectiveness Surveys (from the Charities Review Council)
- NEO Celebration of Leading and Learning Training and Survey
- Authorizer interview, March 19, 2020
- Authorizer Review and Comment Submission Form 20.5-22 Revised
- NEO Board Meeting Minutes (August 27, 2015; April 5, 2017; May 31, 2017; October 30, 2018; August 28, 2018; September 25, 2018)

A.10 Measure: Authorizer High-Quality Authorizing Dissemination

Guiding Question: *To what degree does the authorizer disseminate best authorizing practices and/or assist other authorizers in high-quality authorizing?*

Performance Level Rating: Level 4-Exemplary

Finding: NEO consistently disseminates best authorizing practices and assists other authorizers in high-quality authorizing.

- NEO engages with other authorizers to improve the authorizing community of practice. For example, a January 2020 letter from the executive director at the Minnesota Guild of Public Charter Schools (Minnesota Guild; Guild) to NEO demonstrates that NEO's executive director supported the Guild over a 24-month period in refining its practices and procedures. This included guidance around the use of Epicenter and sharing expertise, ideas and lessons learned with a new charter school application work group. Furthermore, according to the AAP and the annual authorizer reports, NEO actively participates in MACSA meetings. An April 2018 email between MACSA and NEO shows MACSA's willingness to interface and collaborate with NEO, recognizing NEO's commitment as a key stakeholder in training authorizers.
- NEO regularly shares best practices and/or provides technical assistance to other authorizers. For example, a schedule for the 2016 NACSA Leadership Conference shows that NEO was a co-presenter for two sessions (Do Your Homework: Strategies for Effective Due Diligence and Strong Start, Strong School). Additionally, NEO served as a co-presenter for a session around building coalitions in a multiple authorizer setting at a NACSA Leaders Program session in August 2016 (as seen in a session agenda). As previously mentioned, NEO's executive director is also an active member of MACSA, and served on MACSA's Executive Committee (which oversees all MACSA initiatives) in SY 2017-18, and as the chair of MACSA's Effective Practices Committee in SY 2018-19, as well as vice president and a member of the Standards and Principles Committee. Review of the role and responsibilities of the Executive Committee indicates that its duties include overseeing all MACSA initiatives, and the duties of the Effective Practices Committee includes the identification and sharing of effective practices through an established protocol (verified by review of the effective practices protocol). For example, an October 9, 2017 email between NEO (on behalf of MACSA's Executive Committee) and MACSA members shows that they discussed new school decision-making. Furthermore, NEO has provided technical assistance to other authorizers, as demonstrated by an email between NEO and Audubon Center of the North Woods (ACNW), in which an ACNW staff member attended a NEO-led session around data systems as part of her onboarding process, as requested by an ACNW supervisor.
- An official letter from the Minnesota Guild to NEO discusses how NEO's assistance was sought out. As previously mentioned, a January 2020 letter from the executive director at the Minnesota Guild indicates that NEO supported the Guild over a 24-month period in refining its practices and procedures. More specifically, the letter outlines several ways in which NEO provided technical assistance to the Minnesota Guild, such as support with the use of Epicenter and participating in a new charter school application work group in order to share expertise, ideas and lessons learned. Additionally, as previously mentioned, ACNW approached NEO about providing training around data systems to a new ACNW staff member as part of her onboarding process.

Key Evidence:

- A.10 Narrative
- AAP
- FY 2016 Authorizer Annual Report – Novation Education Opportunities
- FY 2017 Authorizer Annual Report – Novation Education Opportunities
- FY 2018 Authorizer Annual Report – Novation Education Opportunities
- FY 2019 Authorizer Annual Report – Novation Education Opportunities
- NEO Charter School Sharing and Technical Assistance Tracker
- NEO Board Development Presentation Tracker
- Charter School Sharing and Tech Assistance Document (application and emails)
- Correspondence between Minnesota Guild and NEO (January 2020)
- Authorizer interview, March 19, 2020
- Authorizer Review and Comment Submission Form 20.5-22 Revised
- A.10 Authorizing Dissemination

A.11 Measure: Authorizer Compliance to Responsibilities Stated in Statute

Guiding Question: *To what degree does the authorizer comply with reporting, submissions and deadlines set forth in Minnesota Statutes?*

Performance Level Rating: Level 3-Commendable

Finding: The authorizer regularly complies with the majority of reporting, submissions and deadlines set forth in Minnesota statutes.

- Since the start of the current authorizer term, the authorizer was 98 percent compliant in all of the areas including MDE required training; statement of income and expenditures; new school affidavits; supplemental affidavits; merged charter contracts; new/renewed charter contracts; change in authorizers; and authorizer annual reports.

Key Evidence:

- A.11 Narrative
- MAPES Compliance Data Spreadsheet – Novation Education Opportunities
- Authorizer Review and Comment Submission Form 20.5-22 Revised
- A.11 Authorizer Compliance

Performance Measures A: Rating (25 Percent Weight of Overall Rating)

MAPES Performance Measures A Rating for Novation Education Opportunities is 3.40.

Performance Measures A: Rating Drivers

- NEO has clear organizational goals and timeframes for achievement that are aligned with its authorizing mission and Minnesota charter school statute.
- NEO received the Minnesota Charter Board Development and Training grant which allowed them to present trainings to school leaders and board chairs of NEO-authorized schools, as well as schools in other Minnesota authorizers' portfolios.
- NEO has a resourceful strategy for its staffing plan, using a mix of NEO staff members and contracted advisors with various areas of expertise (e.g., academics, finance, governance).
- NEO strives to align its work with nationally recognized quality authorizing standards, as evidenced by regular participation at NACSA Leadership Conferences and NACSA-sponsored events. Additionally, NEO contracted with NACSA to conduct an evaluation of their practices in 2019.

Performance Measures A: Recommendations

- Conduct a self-evaluation at least annually to assess the internal ability to oversee the portfolio of charter schools.
- Formalize continuous improvement plans to document actions and growth.
- Ensure that professional development attended by authorizing staff and advisors is measured and evaluated.

Performance Measures B: Authorizer Processes and Decision-Making

B.1 Measure: New Charter School Decisions

Guiding Questions: *To what degree does the authorizer have clear and comprehensive approval criteria and process standards to rigorously evaluate new charter school proposals? To what degree did the authorizer's decisions and resulting actions align to its stated approval and process standards and promote the growth of high-quality charter schools?*

Performance Level Rating: Level 4-Exemplary

Finding: The authorizer consistently implements clear and comprehensive approval criteria and process standards to rigorously evaluate new charter school proposals. Additionally, its decisions and resulting actions consistently align with its stated approval and process standards and promote the growth of high-quality charter schools.

- NEO has a comprehensive application process (which has been in place over the duration of the authorizer term) that includes clear application questions and guidance, and fair, transparent procedures, timelines and rigorous criteria. NEO's comprehensive new school application includes questions and criteria around essential areas such as educational program; accountability goals; federal preference priorities; state education priorities; governance and management; parent and community engagement; marketing and outreach; and budget. Additionally, the narrative and NEO's comprehensive new school application guide states that prospective schools must submit an Intent to Apply form between 30 and 180 days prior to submitting the application. From there, there is a four-phase application screening and review process that includes application screening; application review; interview with the founding team; and NEO Board of Directors determination. The application must be submitted by January 2, and must receive an overall rating of 'good' or 'excellent' to be considered for a positive recommendation.
- Affidavits demonstrate NEO's decisions and resulting actions are consistent across the portfolio over the authorizer term. For example, the affidavits show applicant evaluation scores as well as a results summary to show how many points applicants earned per section and total to gain recommendation for approval. Furthermore, according to the narrative (and as confirmed by an email to the review team in January 2020), NEO states that advisors complete inter-rater reliability training before scoring applications to ensure that their evaluations are consistent. The advisors then make a recommendation to the executive director as to whether the applicant's written evaluation scored 'good' or 'excellent' and therefore should move forward to a capacity interview. If there is any discrepancy in evaluation scoring, the NEO executive director and advisors meet to reach consensus (as evidenced by the January 2020 email from the NEO executive director to application reviewers, identifying a central location for a post-review meeting as well as a set of questions for their discussion).
- Review of the comprehensive new school guide, a completed application consensus rubric for The Studio School (FY 2017) and three new school affidavits (Great Oaks Academy FY 2018, Aspire Academy and Innovation Academy in FY 2019) showing evaluation scores, demonstrate that NEO's decisions and resulting actions align with its AAP. For example, the AAP indicates that applications must be rated 'satisfactory,' 'good,' or 'excellent' in all categories in order to be considered for approval, and review of the completed application consensus rubric and new school affidavits finds that the schools earned at least a "satisfactory" rating in each category and were recommended for approval. Furthermore, as demonstrated in the new school application, NEO's application and decision process has required schools to meet a minimum set of requirements for the review term.

- In its 2019 evaluation of NEO, NACSA found that NEO's new charter school application and decision process aligns with nationally recognized quality authorizing standards. More specifically, the evaluation report includes findings such as NEO ensuring evidence-based decision-making aligned with application criteria by providing the board with a recommendation highlighting the key strengths and concerns, all with a focus on the capacity of the applicant.
- According to the narrative, NEO's application and decision process (which has been in place throughout the duration of the authorizer term) reflects a clear strategy to promote high-quality charter schools. For example, NEO states that only proven experts in areas of educational programming, assessment and instruction, finance and facilities, and governance and operations are recruited to evaluate the written applications and conduct the capacity interviews. Additionally, the approval criteria are rigorous and requires applicants to be rated 'satisfactory,' 'good' or 'excellent' in all categories in order to be considered for approval. For example, if all of the sections are rated 'good' but one section is rated 'Inadequate' or 'fair,' the applicant will not be recommended to advance in the process. Review of the application summary finds that over the term, NEO approved 11 new school applications and denied 12 new school applications based on these ratings. Furthermore, while advisors make recommendations, the NEO board of directors retains final decision-making authority for application approval.
- As previously mentioned, NEO's approval criteria and process standards to rigorously evaluate new charter school proposals has been in place over the duration of the authorizer term, as evidenced by the commissioner-approved authorizer application (AAA) and AAP. Additionally, NEO provided evidence to demonstrate that its decisions and resulting actions have been aligned with its stated approval and process standards over the duration of the authorizer term. For example, new school affidavits show that Innovation Science and Technology Academy received an overall rating of 'good' and a 'satisfactory' or 'good' rating in each section, and was recommended for approval.
- In the MAPES Cohort One Charter School Leadership Survey, 100 percent of respondents agreed or strongly agreed that NEO followed its process standards when making decisions about new charter school proposals. Additionally, during the school leader interviews, all participants agreed that the approval criteria and process standards for evaluating new school proposals are clear and comprehensive. Furthermore, participants who had recently completed the new school application process stated that the process is very clear and rigorous, as well as informative and supportive.
- NEO's new school decisions have resulted in high-quality charter schools as evidenced by new schools achieving MDE High-Quality Charter School designation in the current and/or past years including Universal Academy and Star of the North Academy (2017 and 2018) and Sejong Academy (2019 and 2020).

Key Evidence:

- B.1 Narrative
- AAA/AAP
- NEO Comprehensive New School Application Guide
- NEO Attachment C_New School Application
- Completed NEO Application Review (The Studio School)
- NEO New Charter School Affidavits
- NEO Application Summary
- MDE High-Quality Schools Lists (2017, 2018, 2019 and 2020)
- NACSA Authorizer Evaluation Report, March 2019
- MAPES Cohort One Charter School Leadership Survey – NEO
- Emails between NEO leadership and application reviewers
- Authorizer interview, March 19, 2020
- Charter school leader interviews, April 7, 2020

B.2 Measure: Interim Accountability Decisions (i.e., site/grade level/early learning expansions, ready to open, and change in authorizer)

Guiding Questions: *To what degree does the authorizer have clear and comprehensive approval criteria and process standards to rigorously evaluate proposals of existing charter school expansion requests and other interim changes? To what degree did the authorizer's decisions and resulting actions regarding charter school expansion and other interim changes align to its stated approval and process standards and promote the growth of high-quality charter schools?*

Performance Level Rating: Level 3-Commendable

Finding: The authorizer consistently implements clear and comprehensive approval criteria and process standards to rigorously evaluate proposals of existing charter school expansion requests and other interim changes. Additionally, its decisions and resulting actions regarding charter school expansion and other interim changes consistently align with its stated approval and process standards and promote the growth of high-quality charter schools.

- NEO has a comprehensive application process for expansions, transfer of authorization and interim changes that includes clear application questions and guidance, and fair, transparent procedures, timelines and rigorous criteria. For example, NEO's site expansion application must be submitted by August 1, and includes questions and criteria in essential areas such as need and demand; academic performance; financial performance; capacity; and performance framework ratings. Additionally, the narrative states that NEO's site/grade level expansion application as well as its ready to open criteria has been consistent since 2015. Review of NEO's ready to open criteria shows processes are comprehensive, and include guidance; fair, transparent procedures; timelines; and rigorous criteria. Finally, review of NEO's charter transfer application and guide shows the transfer process requires a site visit and interview as well as an application submission.
- NEO's decisions and resulting actions are consistent across its portfolio of schools. For example, Lionsgate Academy and Great River expansion application materials show that they received 'satisfactory' or 'exemplary' rating in each section, and were recommended for approval at the September 2016 NEO board meeting. A review of email communications between NEO and APEX Academy shows that the school lost its approval to open due to the resignation of its school leader and a significant drop in enrollment, which are aligned with NEO's ready to open criteria. As previously mentioned, a complaint submitted by Odaa Academy regarding NEO's ready to open standards and decision-making alleges that NEO favored one of its existing schools over Odaa and tied its ready to open decisions to matters outside of the authorizers oversight responsibility (i.e., staffing and site planning). Although MDE found that NEO complied with applicable standards in determining that Odaa was not ready to open, MDE's response indicates concerns regarding the process and communication around the ready to open checklist.
- The AAP states that a school must achieve a 'satisfactory' rating for each section of an expansion application in order to be considered for approval. Review of expansion application materials for Lionsgate Academy and Great River School finds that they received a 'satisfactory' or 'exemplary' rating in each section, thus demonstrating that NEO's expansion decisions and resulting actions align with its AAP.

- In its 2019 evaluation of NEO, NACSA finds that NEO “institutes an exemplary pre-opening monitoring system,” and its interim accountability processes align with nationally recognized quality authorizing standards. NEO has a comprehensive ready to open process that has been in place since 2015, and schools must meet the established ready to open criteria in order to be approved for opening. In the narrative, NEO indicates (as was verified by emails between NEO and school board members) that if a school does not meet one or more of the criteria, it must submit a plan outlining how they will meet the criteria as well as provide a revised timeline for completion. If the criteria are not met based on the revised timeline, NEO has the right to postpone the opening of the school by one year.
- NEO’s interim accountability processes, which have been in place for the duration of the authorizer term, reflect a clear strategy to promote high-quality charter schools. For example, NEO’s expansion decisions have resulted in the expansion of high-quality charter schools as evidenced by the successful expansion of Great River School, Lionsgate Academy and Sejong Academy.
- NEO’s approval criteria and process standards to evaluate expansion requests and other interim changes have been in place for at least four years in alignment with its AAA and AAP. However, NEO had two supplemental affidavits denied by the commissioner in December 2019: one for Discovery Charter School and one for Star of the North Academy. The letter of denial from MDE for Discovery Charter School notes deficiencies in five areas that were not adequately addressed or resolved in the revised supplemental affidavit. The letter of denial for Star of the North Academy notes deficiencies in two areas that were not adequately addressed or resolved in the revised supplemental affidavit. These denials reflect that the authorizer’s actions were not consistent throughout the term of the review.

Key Evidence:

- B.2 Narrative
- AAA/AAP
- Ready to Open Decision Documents
- Lionsgate Academy Expansion Documents
- Great River School Expansion Documents
- 19.12-04 MDE Letter to NEO
- NEO Board Meeting Minutes, September 2016
- MAPES Cohort One Charter School Leadership Survey – NEO
- NACSA Authorizer Evaluation Report, March 2019
- NACSA Principles and Standards, 2018 edition
- MDE to NEO for DCS Supp Affidavit-Final
- MDE to NEO for SNA Supp Affidavit-Final
- Authorizer interview, March 19, 2020

B.3 Measure: Contract Term, Negotiation and Execution

Guiding Question: *To what degree does the authorizer execute contracts that clearly define material terms and rights and responsibilities of the school and the authorizer?*

Performance Level Rating: Level 1-Approaching Satisfactory

Finding: The authorizer does not consistently execute contracts that clearly define material terms and rights and responsibilities of the school and the authorizer.

- According to MAPES compliance data, not all contracts in NEO's portfolio of charter schools meet current statutory requirements. While NEO indicates that the contract for Midtown Middle School on file with MDE is null and void, the current charter contract for Midtown Middle School is not compliant per MDE's review rubric dated December 18, 2018.

Key Evidence:

- B.3 Narrative
- AAP
- School Contracts
- MAPES Compliance Data Spreadsheet – Novation Education Opportunities
- Authorizer Review and Comment Submission Form 20.5-22 Revised
- B.3 Midtown Middle School Contract

B.4 Measure: Performance Outcomes and Standards

Guiding Questions: *To what degree does the authorizer execute contracts with clear, measurable and attainable performance standards? To what degree does the authorizer hold charter schools in its portfolio accountable to its academic, financial and operational performance outcomes and standards?*

Performance Level Rating: Level 3-Commendable

Finding: The authorizer regularly executes contracts with clear, measurable and attainable performance standards and holds charter schools in its portfolio accountable to academic, financial, and operational performance outcomes and standards.

- According to a review of the contracts between NEO and its schools, all current contracts define clear, measurable and attainable academic, financial and operational performance outcomes and standards, as well as the consequences for meeting or not meeting performance outcomes and standards. Additionally, review of school contracts demonstrates that each school's contract includes a performance framework that outlines goals for academic performance, financial performance, operational performance and compliance.
- NEO's school performance framework is incorporated into the school's contract and defines clear, measurable and attainable academic, operational and financial performance standards, measures, metrics, targets and weightings. The targets in the Performance Framework are finalized using the most updated school performance baseline data available at the beginning of each contract term. The performance framework, which is included in each school's contract, defines clear, measurable and attainable performance outcomes and standards for academic (e.g., the school's proficiency rate exceeds the state average by up to 10 percentage points and/or the school improves its proficiency rate by at least 10 percentage points from the baseline year); financial (e.g., the school's reserve is enough to cover one full payroll as measured by end of year reserves); and operational performance (e.g., the school is compliant with contract and statute, with no more than three infractions, and any infraction is resolved by assigned deadline). As articulated in section 3.2(d) of NEO's school contract, the school and authorizer agree that the school's operation shall be measured by the school performance indicators set forth in the agreement, including academic outcomes for individual students and for the school as a whole, and standards for governance (including compliance), financial management and school operation. Furthermore, review of contracts demonstrates that NEO clarifies consequences for meeting or not meeting performance outcomes and standards. Consequences, for example, include a shorter contract term (e.g., schools that earn 50-70 percent of points possible overall and in each area are eligible for a three- versus a five-year renewal) or nonrenewal (i.e., schools that earn fewer than 50 percent of the points possible overall and in each area are candidates for nonrenewal). A review of MDE renewal rubrics shows that a number of NEO's contracts received feedback for continuous improvement around operational performance. For example, MDE renewal rubrics for New Century Academy and Universal Academy show feedback related to concerns around admissions or enrollment policies. Review of emails (January-February 2020) between NEO and Universal Academy finds that NEO notified the school about the concerns and requested action by a given date (e.g., update the lottery/admissions policy on the website, and make the anti-bullying policy and literacy plan available on the website). Universal Academy did not resolve these issues by the given deadline, thus resulting in a point deduction in the compliance area of the renewal performance framework (verified by review of Universal Academy's renewal performance framework) and ultimately, a three-year renewal (versus a five-year renewal). Similarly, due to unresolved compliance infractions, New Century Academy received a point deduction in the compliance area of the renewal performance framework (verified by review of New Century Academy's renewal performance framework), which led to a three-year renewal (versus a five-year renewal).

- Performance outcomes are consistent (based on baseline data, size of student body, mission/vision specific) across the portfolio of charter schools. According to NEO's FY 2019 annual report, all schools that NEO authorizes have performance frameworks that include measures for proficiency of all students in reading and math. Additionally, NEO sets and monitors progress toward collective school performance goals in the areas of achievement and growth.
- Contracts align with performance standards of its AAP. For example, in alignment to the AAP, the performance framework in the contract includes standard academic performance measures in English language arts (ELA) and mathematics; defines clear, measurable and attainable academic, operational and financial performance standards; and is designed to achieve outcomes that meet or exceed at least one of the expectations adopted by the commissioner (i.e., the five goals of the World's Best Workforce).
- NEO holds charter schools accountable to academic, financial, and operational performance outcomes and standards. According to the NEO Contract Renewal Performance Framework Monitoring Report, renewal terms are informed by the performance framework. For example, the Sejong Performance Dashboard shows its overall renewal rating (157/186 or 84.41 percent), which led to a five-year renewal term. Additionally, as previously mentioned, both Universal Academy and New Century Academy did not resolve a compliance issue by the given deadline, thus resulting in a point deduction in the compliance area of the renewal performance framework (verified by review of the schools' renewal performance frameworks) and ultimately, a three-year renewal (versus a five-year renewal). Furthermore, in the authorizer interview, authorizing staff indicated that schools who are under-performing receive more touchpoints from authorizing staff (e.g., more learning walks and board observations), and this is verified by the intervention tracker. For example, the intervention tracker indicates that schools highlighted in red will receive three learning walks while schools highlighted in green will receive one learning walk.
- In its 2019 evaluation of NEO, NACSA finds that NEO executes contracts that align with nationally recognized quality performance standards. For example, in the evaluation report, NACSA states that NEO's contract "sufficiently details and outlines the responsibilities of the school and the authorizer, as well as the material terms of the program. The performance framework – incorporated into the contract in accordance with best practices – includes measures for academic, organizational and financial performance, as well as school climate (e.g., parent satisfaction)."
- NEO performance standards reflect a clear strategy to promote high-quality charter schools. According to the narrative, no NEO authorized charter schools achieved the High Quality Charter School designation in 2014 or 2015, prior to implementing the performance framework outcomes and standards. Since implementation, several NEO schools have achieved High Quality Charter School designation, including the Achieve Language Academy, Avalon School and Great River School (2016), Lionsgate Academy and Achieve Language Academy (2017), Lionsgate Academy, Universal Academy and Star of the North Academy (2018), Great River School, Star of the North Academy and Sejong Academy (2019) and Great River School and Sejong Academy (2020).
- Level 2 indicators were met for four years but not for the authorizer term to date. During the previous MAPES review, NEO earned a rating of approaching satisfactory for measure B.4 (Performance Outcomes and Standards), which was communicated to the authorizer in June 2015. NEO's accepted AAP, which included a revised performance framework, was submitted on February 2016.

Key Evidence:

- B.4 Narrative
- AAP
- School Contracts
- MAPES Compliance Data
- MAPES Cohort One Charter School Leadership Survey – NEO
- FY 2016 Authorizer Annual Report – Novation Education Opportunities
- FY 2017 Authorizer Annual Report – Novation Education Opportunities
- FY 2018 Authorizer Annual Report – Novation Education Opportunities
- FY 2019 Authorizer Annual Report – Novation Education Opportunities
- MDE High-Quality Schools Lists (2017, 2018, 2019 and 2020)
- Contract Negotiation Materials
- Contract Revision Materials
- 17.11-02 NEO-Urban Academy Renewal Contract Revised Rubric
- 20.03-05 NEO-Urban Renewal Contract Compliance Review Rubric
- 19.07-11 NEO-TEAM Academy Renewal Contract Review Rubric
- 19.07-11 NEO-NCA Renewal Contract Review Rubric
- 18.04-20 NEO-RSTEM Renewal Contract Review Rubric
- 20.02-25 NEO-Universal Renewal Contract Compliance Review Rubric
- Authorizer Review and Comment Submission Form 20.5-22 Revised
- Intervention Tracker
- B.4 Part 1 Performance Outcomes and Standards
- B.4 Part 2 Performance Outcomes and Standards
- B.4 Part 3 Performance Outcomes and Standards

B.5 Measure: Authorizer's Processes for Ongoing Oversight of the Portfolio of Charter Schools

Guiding Question: *To what degree does the authorizer monitor and oversee the charter schools in the areas of academics, operations and finances according to the processes outlined in the contract and the AAP?*

Performance Level Rating: Level 4-Exemplary

Finding: The authorizer consistently monitors and oversees the charter schools in the areas of academics, finances, and operations, according to the processes outlined in the contract and the AAP.

- Review of the narrative and NEO's oversight plan (outlined in NEO's authorizer map) shows that it has clear, comprehensive processes for oversight and monitoring. For example, NEO attends at least two board meetings annually at each of its authorized schools, conducts annual formal site visits to review compliance with applicable laws, and reviews each school's progress and renewal status based on the performance framework, which includes academic, financial and operational indicators.
- NEO's oversight plan includes the evaluation of academic, financial and operational performance. For example, as documented in NEO's authorizer map, NEO reviews each school's performance with school leader(s) at a formal site visit using the performance framework monitoring report, and schools' progress in relation to the performance framework is included in NEO's annual reports. If a school is not meeting a satisfactory level of performance, NEO reviews the performance framework and renewal status more frequently and discusses the school's plan to improve the results and progress. Additionally, review of a Zoom meeting tracker finds that NEO discussed contract renewal and the performance framework with each of its schools, which includes a comprehensive review of academics, finances, operations and compliance. Furthermore, review of the Agamim Classical Academy Oversight Example finds that NEO monitors compliance with applicable laws. For example, during the annual site visit, NEO verifies compliance with statutory requirements such as board member background checks, board composition and training, adherence to open meeting law (via the board meeting observations), standards alignment, etc.
- NEO's oversight activities align with its stated oversight and monitoring processes in its AAP. For example, the AAP states that the authorizer will follow and use the NEO oversight plan and performance framework to monitor and evaluate the fiscal, operational and academic performance of the schools in its portfolio. During the authorizer interview, authorizing staff affirmed that staff and advisors follow the oversight plan to conduct oversight activities.
- In the narrative, NEO states that it follows the oversight plan for each of its schools, which includes a review of the performance framework, demonstrating that its oversight and monitoring practices are consistent across the portfolio of charter schools. The same set of tools (such as the annual site visit checklist and board observation reports) are used with all NEO schools. Furthermore, according to the narrative and confirmed by authorizing staff in the interview, NEO advisors are trained for consistent practices using the NEO authorizer map, which outlines steps to provide directions to prepare for, conduct, document and communicate the expected process.

- According to review of the narrative, NEO evaluated its practices in terms of NACSA's Principles and Standards to determine that their oversight processes align with nationally recognized quality authorizing standards. For example, in alignment with principles and standards, NEO effectively monitors charter board performance through regularly scheduled observations and document reviews; provides technical assistance to school boards as needed to ensure timely compliance; defines and communicates to schools the process, methods and timing of gathering and reporting school performance and compliance data; and, implements an accountability system that effectively streamlines federal, state and local performance expectations and compliance requirements while protecting schools' legally entitled autonomy and minimizing schools' administrative and reporting burdens.
- NEO processes for ongoing oversight of the portfolio of charter schools reflect a clear strategy to promote high-quality charter schools. For example, according to the NEO 2019 Celebration of Leading and Learning agenda, NEO presented some schools with the NEO Stewardship Award in Finance. This is awarded to schools that meet criteria such as having no audit findings, building a healthy fund balance of at least 20 percent, and submitting required documents to MDE and NEO on time.
- The AAA/AAP, which has been implemented over the duration of the authorizer term, includes the oversight plan, which comprehensively lays out the processes for monitoring and overseeing the charter schools in the areas of academics, operations and finances, according to the processes outlined in the contract and the AAP.
- In the MAPES Cohort One Charter School Leadership Survey, 100 percent of respondents agreed or strongly agreed that NEO monitors the schools' academic, financial and operational performance standards as outlined in the contract. Additionally, during the school leader interviews, all participants stated that NEO consistently monitors and oversees their schools' performance in academics, operations and finances toward the goals set forth in the contracts. For example, participants mentioned methods such as site visits, board observations and annual reviews.
- NEO's performance standards, which are monitored through NEO's oversight and monitoring plan, have resulted in high-quality charter schools, as evidenced by several NEO schools having achieved High Quality Charter School designation from MDE (Achieve Language Academy, Avalon School and Great River School [2016], Lionsgate Academy and Achieve Language Academy [2017], Lionsgate Academy, Universal Academy and Star of the North Academy [2018], Great River School, Star of the North Academy and Sejong Academy [2019] and Great River School and Sejong Academy [2020]).

Key Evidence:

- B.5 Narrative
- AAP
- NEO Authorizing Map
- NEO Zoom Meeting Tracker
- 17.11-02 NEO-Urban Academy Renewal Contract Revised Rubric
- 20.03-05 NEO-Urban Renewal Contract Compliance Review Rubric
- 19.07-11 NEO-TEAM Academy Renewal Contract Review Rubric
- 19.07-11 NEO-NCA Renewal Contract Review Rubric
- 18.04-20 NEO-RSTEM Renewal Contract Review Rubric
- 20.02-25 NEO-Universal Renewal Contract Compliance Review Rubric
- Intervention Tracker
- Dashboard Development – School Performance Data Document
- MDE High Quality Charter Schools Lists (2016, 2017, 2018, 2019, 2020)
- NEO 2019 Celebration of Leading and Learning agenda
- Authorizer interview, March 19, 2020
- Authorizer Review and Comment Submission Form 20.5-22 Revised
- Agamim Classical Academy Oversight Example
- B.5 Part 1 Oversight
- B.5 Part 2 Oversight
- B.5 Part 3 Oversight

B.6 Measure: Authorizer's Standards and Processes for Interventions, Corrective Action and Response to Complaints

Guiding Question: *To what degree does the authorizer have clear and comprehensive standards and processes to address complaints, intervention and/or corrective action?*

Performance Level Rating: Level 4-Exemplary

Finding: The authorizer consistently has clear standards and processes in place to address complaints, intervention and corrective action.

- NEO's AAP includes a complaint policy (adopted in 2012 and revised in 2015) which describes clear and comprehensive standards, procedures and processes to address and resolve complaints, interventions and corrective actions. For example, the policy states that NEO can redirect complaints to school leadership in order to resolve complaints with the school before involving NEO. Additionally, the policy indicates that NEO can contract with an external expert in complaint resolution who can serve as a neutral party. Review of a sample complaint communication example finds that NEO follows this policy, as it outlines how NEO contracted with an external expert in order to conduct fact finding and make a determination regarding a complaint against a school. Review of complaints submitted to MDE from SY 2016 through SY 2019 and NEO's responses show that the authorizer implements its policy. For example, a complaint was submitted to MDE in December 2016 regarding concerns at Discovery Charter School and the alleged violation of a board member in regards to training. A letter from NEO in response to the complaint shows that the authorizer investigated the complaint and had sufficient evidence to refute the allegations, which was confirmed by MDE in January 2017. Similarly, a complaint from the Odaa Academy board of directors was submitted to MDE in July 2019 regarding NEO's decision not to open the school in the fall 2019. A July 19, 2019 letter from the office of Ratwik, Roszak & Maloney shows the law firm, representing NEO, provided a response to the complaint.
- Review of an intervention tracker (which includes all of NEO-authorized schools) demonstrates that NEO consistently monitors each of its schools and makes decisions and resulting actions that are consistent across the portfolio of charter schools, and align with its stated standards and processes in its AAP. The intervention tracker includes the academic performance level of each school, which is highlighted in green, yellow, orange and red depending on the level (e.g., red indicates low performance). In the authorizer interview, authorizing staff indicated that schools who are under-performing receive more touchpoints from authorizing staff (e.g., more learning walks and board observations), and this is verified by the intervention tracker. For example, the intervention tracker indicates that schools highlighted in red will receive three learning walks while schools highlighted in green will receive one learning walk.
- Review of intervention correspondence between NEO and one of its schools demonstrates that its decisions are aligned with data generated under oversight and monitoring practices. For example, NEO provides documentation, including email communications and data (SY 2014-18), on an intervention process for Kato Public Charter School, that did not meet the satisfactory level required for pupil performance at the end of the intervention process, and was recommended for nonrenewal.

- In the authorizer review and comment submission form, NEO states that its standards and processes around complaints, intervention and corrective action align with NACSA's Principles and Standards (2018 Edition). For example, NEO identifies alignment with the following standard: "A quality authorizer implements a comprehensive performance accountability and compliance monitoring system that is defined by the charter contract and provides the information necessary to make rigorous and standards-based renewal, revocation, and intervention decisions." As previously mentioned, NEO has a performance framework that is included in the contract, by which it makes decisions around areas such as renewal, revocation, and intervention. In the authorizer interview, authorizing staff indicated that the performance framework is used as the basis for renewal, revocation, and intervention decisions, and performance is regularly monitored through means such as annual site visits and board meeting observations. Additionally, during the school leader interviews, all participants stated that the performance framework informs NEO's renewal, revocation, and intervention actions and decisions.
- In the MAPES Cohort One Charter School Leadership Survey, 90 percent of respondents agreed or strongly agreed that NEO provided clear feedback when there was a concern. Additionally, during the school leader interviews, all participants reported that NEO has clear and comprehensive standards and processes to address complaints, intervention, and/or corrective action. For example, participants reported that NEO sends notices of concern based on their monitoring of the performance framework with an expectation and timeline for resolution. They shared instances of receiving a notice of concern, which included a deadline for resolution, noting that NEO also sometimes provided support and guidance around how to resolve the issue, but ultimately left it up to the school to determine how the issue would be resolved. Additionally, all participants demonstrated awareness of the complaint policy, and indicated that when NEO is alerted of a complaint, they discuss the complaint with the school in order to determine the root cause. They stated that, to the greatest extent possible, NEO encourages and supports the school in resolving the complaint directly with the complainant.

Key Evidence:

- B.6 Narrative
- AAP
- Complaint Communication Example, May 2017
- 16.12-15 NEO Response (Discovery Charter School)
- 10.1.17 MDE Closeout Letter (Discovery Charter School)
- 19.07-19 NEO Response to Complaint (Odaa Academy)
- NEO Intervention Tracker and Intervention Correspondence
- Kato Corrective Action Documentation (SY 2014-18)
- Authorizer interview, March 19, 2020
- Authorizer Review and Comment Submission Form 20.5-22 Revised
- MAPES Cohort One Charter School Leadership Survey – NEO
- B.6 Complaints and Interventions

B.7 Measure: Charter School Support, Development and Technical Assistance

Guiding Question: *To what degree does the authorizer support its portfolio of charter schools through intentional assistance and development offerings?*

Performance Level Rating: Level 4-Exemplary

Finding: The authorizer consistently supports its portfolio of charter schools through intentional assistance and development offerings.

- According to NEO's annual reports, it provides robust feedback to authorized schools through board observations, site visits, and document review, as well as through ongoing communication; facilitates the exchange of best practices among authorized schools; and conducts workshops based on the needs of the schools in its portfolio. In the narrative, NEO states that it provides proactive, intentional technical assistance. For example, NEO offers professional development at an annual Celebration of Leading and Learning. Review of a May 14, 2018 email from NEO to schools shows a guest speaker shared strategies for building donor and non-profit relations. Additionally, in order to support timeliness with reporting deadlines, NEO sends notifications to its schools about upcoming important submissions (e.g., Annual Charter Assurances).
- A review of emails between NEO leadership and its schools and NEO technical assistance presentation materials (included in the charter school sharing and technical assistance document) demonstrates that support and technical assistance are provided in a variety of areas, such as board governance, audits, data analysis, progress monitoring, school culture, etc. Review of the annual report shows that NEO has provided workshops on topics including site expansion, complying with open meeting law, avoiding audit findings, building fund balance, and contract goal-setting.
- A review of completed board observation forms (included in the charter school sharing and technical assistance document) finds that support and technical assistance are provided in a manner to preserve school autonomy. For example, on one board observation form (March 19, 2018), the observer notes that there was not an update on the progress toward the goals for the school leader evaluation, and noted that while it is not required, some boards find it useful to check in regularly instead of once at the end of the year. Additionally, in the narrative and in the authorizer interview, NEO reiterates that it has a school autonomy policy (included in its AAP) that clearly states that NEO will provide monitoring and oversight to its schools, but will not operate them.
- NEO provides support and technical assistance to all of its schools in a consistent manner, as emails between NEO leadership and its schools demonstrates that it offers collective technical assistance (e.g., Celebration of Leading and Learning sessions) to all of its schools, as well as individual technical assistance.
- A review of emails between NEO leadership and its schools and NEO technical assistance presentation materials (included in the charter school sharing and technical assistance document) shows that NEO regularly offers support and technical assistance based on demonstrated need and designed to prevent problems. For example, as seen in agendas and participant lists, NEO hosts an annual Celebration of Leading and Learning for its schools, and has presented several sessions as part of the board development and training grant.
- Review of training agendas finds that support and technical assistance are designed to promote high-quality charter schools, as they include topics such as facilitation of the sharing of best practices (e.g., improving student academic performance, student attendance, graduation rates). As previously mentioned, NEO hosts an annual Celebration of Leading and Learning for its schools, and has also presented several sessions as part of the board development and training grant (as evidenced by agendas and participant lists).

Key Evidence:

- B.7 Narrative
- AAP
- FY 2016 Authorizer Annual Report – Novation Education Opportunities
- FY 2017 Authorizer Annual Report – Novation Education Opportunities
- FY 2018 Authorizer Annual Report – Novation Education Opportunities
- FY 2019 Authorizer Annual Report – Novation Education Opportunities
- Board Development Grant Participant List
- Charter School Sharing and Technical Assistance Document
- 2019 Celebration of Leading and Learning Training and Survey
- Authorizer interview, March 19, 2020

B.8 Measure: High-Quality Charter School Replication and Dissemination of Best School Practices

Guiding Question: *To what degree does the authorizer plan and promote model replication and dissemination of best practices of high-quality charter schools?*

Performance Level Rating: Level 4-Exemplary

Finding: The authorizer consistently plans and promotes model replication and dissemination of best practices of high-quality charter schools.

- In the AAP, NEO outlines an intentional plan for successful model replication and dissemination of best practices and models/practices. NEO indicates that it identifies schools that are achieving exemplary ratings in different performance areas using the performance framework, the NEO Stewardship Award in Finance criteria, document review, and board and site visits. For example, in the narrative, NEO states that it identified Lionsgate Academy for potential model replication after it was identified by MDE as a high-quality school. NEO provided Lionsgate Academy with support related to replication, which has resulted in the opening of an approved replication site, Shoreview. NEO's annual reports explain that the authorizer has disseminated best practices through its annual meetings and Celebrations of Leading and Learning to facilitate the exchange of best practices.
- As previously mentioned, NEO identified Lionsgate Academy as a potential school for replication, and provided the school with support related to replication. As a result, Lionsgate Academy has replicated with the opening of Shoreview. Also, in the narrative, NEO described the facilitation of sharing between Great River School and Lionsgate Academy for a successful CSP grant application process. Additionally, an example of successful dissemination of effective practices includes implementation of the Charter Board Training and Development Grant through presentation (as seen in board training documentation). According to the FY 2016 annual report, NEO encouraged schools leaders who have experience with best practices in high-performing schools to use the CSP grant to replicate and disseminate best practices. The annual report provides the example that Agamim Classical Academy focused on replication of the classical education model.
- NEO has disseminated effective practices to multiple schools. For example, through the implementation of the Charter Board Training and Development Grant (as seen in the board development grant participant list), NEO has presented on effective governance practices to charter board members at its schools as well as to schools in other authorizers' portfolios.

Key Evidence:

- B.8 Narrative
- AAP
- FY 2016 Authorizer Annual Report – Novation Education Opportunities
- FY 2017 Authorizer Annual Report – Novation Education Opportunities
- FY 2018 Authorizer Annual Report – Novation Education Opportunities
- FY 2019 Authorizer Annual Report – Novation Education Opportunities
- NEO Stewardship Award in Finance Criteria
- Storyboard for Sharing Knowledge and Ideas Session Notes, January 2020
- NEO Board Development Grant Participant List
- NEO Master List – School Resources
- MDE High-Quality Charter Schools Lists (2016, 2017, 2018, 2019, 2020)
- NACSA Authorizer Evaluation Report, March 2019
- Authorizer interview, March 19, 2020
- Charter school leader interviews, April 7, 2020

B.9 Measure: Charter School Renewal and Termination Decisions

Guiding Questions: *To what degree does the authorizer have clear and comprehensive standards and processes to make high stakes renewal and termination decisions? To what degree did the authorizer's renewal and termination decisions align to its stated renewal standards and processes and promote the growth of high-quality charter schools?*

Performance Level Rating: Level 3-Commendable

Finding: The authorizer implements standards and processes to make high-stakes renewal and termination decisions that align with its stated renewal standards and processes and promote the growth of high-quality charter schools.

- In the AAP and school contracts, NEO outlines transparent and rigorous renewal standards and processes that allow it to make merit-based renewal and termination decisions based on the school's performance framework. For example, as stated in the AAP, NEO schools must achieve at least a 'satisfactory' rating (50 percent of possible points) to be eligible for a three-year contract renewal and at least an 'exemplary' rating (70 percent of possible points) to be eligible for a five-year contract renewal. Additionally, NEO meets with each of its schools annually to discuss the school's progress on the performance framework and prospects for renewal based on the results.
- Review of NEO board meeting minutes from February 2020 and email correspondence and renewal materials for Sejong Academy demonstrate that NEO's decisions and resulting actions are consistent across its portfolio of charter schools. For example, email correspondence and renewal materials for Sejong Academy show that the school received 84.95 percent of points possible overall, and was given a five-year renewal term. Similarly, Great River School received 61 percent and above in each category for an overall percentage of 75.53 percent, and was recommended for a five-year renewal.
- In the AAP, NEO states that a school can receive either a three- or five-year renewal. As previously mentioned, review of NEO board meeting minutes from February 2020 showed that schools received either three-year or five-year contracts, which aligns with its AAP.
- In its 2019 evaluation of NEO, NACSA finds that NEO's renewal standards and processes align with nationally recognized quality authorizing standards. Specifically, NACSA finds that NEO has "established clearly defined thresholds for full- and short-term renewal" and "regularly measures a school's performance against renewal thresholds and makes this data available to all schools throughout the academic year and charter term."
- NEO's renewal standards and processes reflect a clear strategy to promote high-quality charter schools as evidenced by NEO's high thresholds for renewal that are defined in its AAA/AAP. As previously mentioned, NEO schools must achieve at least a 'satisfactory' rating (50 percent of possible points) to be eligible for a three-year contract renewal and at least an 'exemplary' rating (70 percent of possible points) to be eligible for a five-year contract renewal.
- Level 2 indicators were met for four years but not for the authorizer term to date. During the previous MAPES review, NEO earned rating below satisfactory for measure B.9 (Charter School Renewal and Termination Decisions), which was communicated to the authorizer in June 2015. Although NEO submitted its initial AAP on July 1, 2015, review of the NEO CAAP Review Rubric shows that the authorizer did not sufficiently resolve measure B.9 and therefore the AAP was not approved. NEO's accepted AAP was submitted on February 2016.

Key Evidence:

- B.9 Narrative
- AAA/AAP
- Contract Renewal Documentation (emails, contract renewal performance framework results summary, renewal performance evaluation reports)
- NEO Board Meeting Minutes, February 2020
- MDE High-Quality Charter Schools Lists (2016, 2017, 2018, 2019, 2020)
- Emails regarding closure
- MAPES Cohort One Charter School Leadership Survey – NEO
- NACSA Authorizer Evaluation Report, March 2019
- 15.07-31 NEO CAAP Review Rubric
- Authorizer interview, March 19, 2020

Performance Measures B: Rating (75 Percent Weight of Overall Rating)

MAPES Performance Measures B Rating for Novation Education Opportunities is 3.20.

Performance Measures B: Rating Drivers

- NEO has clear and comprehensive approval criteria and process standards to rigorously evaluate new charter school proposals and existing charter school expansion and other interim changes, and is consistent in its decisions and resulting actions. This is evidenced by seven NEO-authorized schools that have achieved the High-Quality Charter School designation from MDE in the current or past school years.
- NEO has clear and comprehensive standards and processes to make high stakes renewal and termination decisions. This is evidenced by several NEO-authorized schools that have achieved the High-Quality Charter School designation from MDE in the current or past school years.
- All of NEO's protocols and processes are detailed in its authorizer map (e.g., board observation protocol, learning walk protocol), which ensures transparency and consistency in implementation.
- NEO's AAP outlines an intentional plan for successful model and best practice replication and dissemination, and NEO has implemented this plan throughout the duration of the authorizer term. Additionally, NEO hosts annual Celebrations of Leading and Learning for its schools, during which schools share and learn about best practices.

Performance Measures B: Recommendations

- Ensure that all contracts in the portfolio of charter schools meet current statutory requirements.
- Ensure that issues identified in MDE review of affidavits are addressed or resolved.

Appendix A: Authorizer Portfolio Information

Operational Schools: Achieve Language Academy, Agamim Classical Academy, Avalon School, Discovery Charter School, Great River School, Kato Public Charter School, Lafayette Public Charter School, Lionsgate Academy, Nerstrand Charter School, New Century Academy, New City School, North Metro Flex Academy, Rochester STEM Academy, SAGE Academy, Sejong Academy, St. Cloud Math and Science Academy, Star of the North Academy, TEAM Academy, Universal Academy, Urban Academy

Preoperational Schools: Aspire Academy, Enspire Academy, Great Oaks Academy, Innovation Academy, Midtown Middle School, Quantum STEAM Academy, STEAM Academy, The Studio School

Closed Schools: Big Picture Twin Cities

Never Opened Schools: Forten Academy, Odaa Academy of Science and Technology, Open Door Academy, Twin Cities Community School

Schools that have transferred into portfolio: N/A

Schools that have transferred out of portfolio: Blue Sky Charter School

Merged schools over the term of the review period: N/A

Appendix B: Evaluation Methodology

SchoolWorks is committed to ensuring inter-rater reliability and consistency across all MAPES reports. In order to achieve this, SchoolWorks adopts the following methodology.

1. SchoolWorks assigned each authorizer a two-person evaluation team that includes a team lead and team writer.
2. All evaluators then engage in a training with the Minnesota Department of Education (MDE) during which they norm around ratings, evidence and report language.
3. The lead and writer review all submitted documents and rate the evidence submitted by the authorizer.
4. Teams participate in a pre-interview call. During this call, the team comes to consensus, deciding upon initial ratings. Also during this call, team members identify any standards for which they need additional clarification.
5. Team members lead in-person interviews with authorizing staff and representatives from the authorizer's portfolio of charter schools. Following the interview, evaluators may ask for additional documentation to be submitted by the authorizer.***
6. Team members use interview responses and any additional document submissions in alignment with the MAPES standards and, if applicable, revise their initial ratings.
7. Team members participate in a consensus call during which they finalize their ratings.
8. Draft reports are completed and reviewed by a SchoolWorks content editor. The content editor reviews ratings and evidentiary alignment with the MAPES rubric within each individual report, and ensures consistency of ratings across all reports.
9. The SchoolWorks project manager reviews all reports to ensure consistency of ratings and sufficiency of evidence.
10. Draft reports are submitted to MDE for review.
11. MDE shares draft reports with authorizers for factual review. During the factual review, authorizers may submit additional documentation to clarify factual errors.
12. SchoolWorks evaluators review the factual corrections submitted by the authorizer and any accompanying documentation. Based on the authorizer's submissions, they consider whether additional evidence impacts the ratings identified in the final report.
13. Evaluators finalize their MAPES reports and submit to the SchoolWorks project manager.
14. The SchoolWorks project manager reviews all finalized reports.
15. Final reports are submitted to MDE for review.

*** Due to COVID-19, interviews were conducted via videoconference.