

## Minnesota Authorizer Performance Evaluation System (MAPES) Performance Report

### Authorizer Information

**Authorizer:** Student Achievement Minnesota

**Authorizer Type:** Single-Purpose

**Evaluation Period:** July 2015 – June 2020

**Report Issue Date:** June 12, 2020

### Characteristics of the Authorizer

- The authorizer's mission is to improve student achievement through the quality authorization of charter schools, which it defines as providing schools with the oversight, monitoring and technical support to move them from good to excellent.
- The authorizer's staffing model is small, with a single staff person (the director) as the main point of contact and the use of core consultants to provide targeted technical support around curriculum and instruction.
- The authorizer's goals are to improve student achievement, to grow its portfolio of charter schools, and serve more disadvantaged students.
- The authorizer does not restrict the educational models of the schools in its portfolio but emphasizes academic performance and per pupil academic achievement.

### Overall Performance Rating

**MAPES Overall Performance Rating for Student Achievement Minnesota is 3.53 – 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)**                                               | 1           |
| A.3: Authorizer Structure of Operations (2.5 percent)                                               | 1           |
| A.4: Authorizing Staff Expertise (2.5 percent)                                                      | 3           |
| 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)                        | 4           |
| A.9: Authorizer Self-Evaluation of Capacity, Infrastructure and Practices (1.25 percent)**          | 1           |
| A.10: Authorizer High-Quality Authorizing Dissemination (1.25 percent)**                            | 3           |
| A.11: Authorizer Compliance to Responsibilities Stated in Statute (3.75 percent)                    | 4           |
| <b>Total Performance Measures A Rating:</b>                                                         | <b>3.15</b> |

**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)                                                                                                                   | 4           |
| B.4: Performance Outcomes and Standards (11.25 percent)                                                                                                                       | 4           |
| B.5: Authorizer's Processes for Ongoing Oversight of the Portfolio of Charter Schools (7.5 percent)                                                                           | 3           |
| 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)**                                                                                            | 2           |
| 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)                                                                                                            | 4           |
| <b>Total Performance Measures B Rating:</b>                                                                                                                                   | <b>3.65</b> |

*\*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.

- Student Achievement Minnesota's (SAM) Charter School Program Guide states that SAM is a single-purpose authorizer whose mission is "to improve student achievement through the quality authorization of charter schools." The contract template states that the authorizer's primary purpose is to improve all pupil learning and all student achievement. This is aligned with Minnesota statute Stat.124E.01 Subd. 1 (1).
- The narrative states that the authorizer is carrying out its mission by developing and growing its portfolio. For example, the narrative explains that SAM solicits and considers all authorizer inquiries to verify whether the applicant is compatible with SAM's mission. The narrative also states, and the authorizer confirmed during the interview, that SAM is committed to promoting high-quality schools that meet an identified need and prioritize a commitment to improving student achievement. The secondary focus of the authorizer's mission, as outlined in the contract template and confirmed during the authorizer interview, is to increase learning opportunities for all pupils; encourage the use of different and innovative teaching methods; measure learning outcomes; establish new forms of accountability for schools; and create new professional opportunities for teachers.
- SAM implements its mission from both the commissioner-approved authorizer application (AAA) and commissioner-approved authorizing plan (AAP). The mission as stated within the authorizer's Charter School Program Guide and on its website is the same as that articulated in its AAP.
- During the authorizer interview, respondents verified SAM's mission, stating that its mission is to improve student achievement through quality authorizing, and specifically, with a focus on oversight and monitoring of the schools within its portfolio. When asked how the authorizer defined "quality authorizing," participants explained that quality authorizing means holding schools accountable based on its alignment with state statute, the performance goals set forth in the contract and the authorizer's mission. The authorizer lists its mission on its website, in its program guide and in all its contracts with its schools.
- In the MAPES Cohort One Charter School Leadership Survey, 67 percent of respondents (n=3 total respondents) agreed or strongly agreed that they are familiar with the authorizer's mission. During the charter school leader interview, all participants consistently verified the authorizer's mission and stated that the mission was exemplified through an emphasis on ambitious student academic outcomes within their charter contracts, as well as strong oversight of finance and governance.

**Key Evidence:**

- A.1 Narrative
- Charter School Program Guide
- AAA/AAP
- Fulfilling Mission
- Mission Verification (Contract)
- MAPES Cohort One Charter School Leadership Survey – Student Achievement Minnesota
- Authorizer interview, March 17, 2020
- Charter school leader interview, April 8, 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 1-Approaching Satisfactory

**Finding:** The authorizer has organizational goals aligned with its authorizing mission and Minnesota charter school statute; however, they do not include specific criteria and metrics.

- According to the AAP, the authorizer has three organizational goals with general timeframes for achievement: 1) to improve student achievement on an annual basis; 2) to realize the replication of high-performing models (5 models by 2019); and, 3) to increase the number of disadvantaged students served. However, while the AAP states that its vision is to increase student achievement as a result of quality oversight and monitoring practices, there are not clear and measurable success measures put in place. The narrative states that SAM evaluates the schools in its portfolio by comparing them to the resident district and state averages on state assessments; however, neither the AAP nor the narrative include specific metrics aligned with these comparisons. For example, one of its goals is to increase the number of disadvantaged students served. During the interview and in its narrative, the authorizer describes “disadvantaged” as those students who qualify for free- and reduced-price meals (FRL); however, this definition is not specifically included in the AAP goals.

**Key Evidence:**

- A.2 Narrative
- AAA/AAP
- Goal Implementation
- Charter Openings
- Organizational Goals
- Authorizer interview, March 17, 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 1-Approaching Satisfactory

**Finding:** Although the authorizer operates with a clear structure of duties and responsibilities sufficient to effectively oversee its portfolio of charter schools, safeguards have not been in place at least three years.

- The narrative, AAP and document outlining the authorizer’s organizational structure show that SAM has a board chair, a director (0.4 FTE) and external consultants (0.1 FTE). During the interview, the authorizer stated that it uses external consultants largely to provide technical support to schools. Additionally, the authorizer stated that SAM may use external consultants on an as-needed basis to review applications, specifically when specialized expertise is required in areas such as special education, English language learning (ELL), finance, or a specific educational model (e.g., Montessori, STEM). Job descriptions for the director and consultant duties and responsibilities are clear. For example, the director’s function within the organization is to establish and implement the oversight program for charter schools, while external consultants are tasked with reviewing and analyzing school performance, meeting with school personnel to develop methods resulting in enhanced school performance, and offering evaluative judgments and assessments as it pertains to charter school authorizing.
- In the narrative and during the interview, the authorizer indicated that the structure of duties has remained the same since the submission of both the AAA and the AAP. Additionally, the document outlining the organizational structure shows that staffing has remained the same throughout the term of review.
- Documents show that the authorizer signed data sharing agreements between MDE and SAM in August 2015 and January 2019. SAM’s AAP states that it uses Bitlocker to protect data and files on its computers. While the authorizer provided a screenshot of VeraCrypt, the encryption and security tool it uses to safeguard school and student information, and records relating to authorizing, documentation does not confirm that the authorizer has had this safeguard in place for at least three years.

**Key Evidence:**

- A.3 Narrative
- AAA/AAP
- Organizational Structure
- Security
- MAPES Job Descriptions 031720
- MAPES Consultant Responsibilities 031720
- 19.01-30 SAM Data Sharing Agreement - Executed
- MDE-SAM (2015)
- Authorizer interview, March 17, 2020
- Charter school leader interview, April 8, 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 3-Commendable

**Finding:** The authorizer consistently has appropriate experience, expertise and skills to sufficiently oversee the portfolio of charter schools.

- A review of resumes shows that SAM's current director has 17 years of experience working in charter schools, eleven as a principal/director and five as the director of SAM. Through this work, the director brings experience in school administration. The board chair's resume shows that she has sixteen years of experience as executive director of another Minnesota authorizer, and served as vice president and general counsel for a financial corporation, bringing legal experience, expertise and skills to the position. During the authorizer interview, the participants explained that, while the director is largely responsible for overseeing and monitoring the schools within its portfolio, the core consultants provide technical support to schools. The narrative indicates that SAM consistently works with two external consultants, Lori Magstadt and Dave Bakke, who, according to their resumes, bring experience in curriculum and instruction, as well as in school improvement. There are additional credentials included in the Staff Expertise document for William Henak and Peter Bell, two SAM board members. According to their resumes, Mr. Henak brings financial expertise and Mr. Bell brings experience in financial oversight, human resources, supervisory skills and leadership.
- SAM's staff are able to sufficiently oversee the portfolio of charter schools. As stated above, the authorizer's staff and board members have experience, expertise and skills in charter school authorizing, curriculum, instruction, English language learning, finance, operations and law as evidenced by resumes. Additionally, the authorizer hires external consultants and external reviewers when there are new school applications to provide additional expertise as needed.
- SAM's staff experience, expertise and skills align with nationally recognized quality authorizing standards, as applicable to NASCA standard #1: Agency Commitment and Capacity. This includes expertise and leadership in all areas deemed essential to charter school oversight (i.e., curriculum and instruction, assessment, finance, operations, law, leadership, special education, English language development, and non-profit governance and management). The authorizer also maintains a staffing level that is sufficient to carry out its authorizing responsibilities and commensurate with the scale of its charter school portfolio.
- Authorizing staff possess credentials demonstrating experience, expertise, and skills in charter schools academics, finance, operations and law. SAM's director holds a principal's license as well as an elementary education teaching license from the state of Minnesota. One of SAM's consultants and a board member are licensed as English as a Second Language (ESL) teachers. Documentation shows that SAM has two board members who are Certified Public Accountants, a board member licensed in Emotional Behavior Disorders and Learning Disabilities, as well as Director of Special Education. Finally, the board chair of SAM has an attorney's license.
- Level 2 indicators were met for four years but not for the authorizer term to date. In May 2015, MDE placed SAM in corrective action due to its MAPES performance rating of 'Approaching Satisfactory', including a rating in A.4: Authorizer Staff Expertise that fell below 'Satisfactory'. The authorizer exited corrective action December 2015.

**Key Evidence:**

- A.4. Narrative
- 20.05.22- A.4 MAPES 0520 Narrative
- Staff Expertise
- NACSA SAM Alignment
- Organizational Structure
- MAPES Cohort One Charter School Leadership Survey – Student Achievement Minnesota
- FY 2016 Authorizer Annual Report – Student Achievement Minnesota
- FY 2017 Authorizer Annual Report – Student Achievement Minnesota
- FY 2018 Authorizer Annual Report – Student Achievement Minnesota
- FY 2019 Authorizer Annual Report – Student Achievement Minnesota
- 20.05-22 A.4 0520 Board Member SAM Affiliation
- 20.05-22 A.4 0520 Board Member Finance Expertise
- 15.06-03 MAPES Notice of Corrective Action - SAM
- Authorizer interview, March 17, 2020
- Charter school leader interview, April 8, 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 builds the knowledge base of its authorizing leadership and staff through professional development, which is aligned with the authorizer's operations, mission and goals for overseeing its portfolio of charter schools.

- During the interview, when asked how SAM plans its own professional development, participants stated that they are focused on building their own knowledge base, especially around trends in education. For example, participants described their focus on data-driven instruction (DDI), especially around how to collect data and how to get schools involved in using data more strategically to drive instruction. They also explained that, more recently, they have been attending conferences around how to support growing diversity within schools and sharing information during directors' meetings with both school directors and assistant directors. Meeting agendas from October 2018 and February 2019 show that the authorizer met with the school directors to discuss different aspects of diversity and culture. For example, the October 2019 agenda shows that participants discussed how to advance racial equity within schools.
- SAM's professional development (PD) aligns with its mission to improve student achievement through the quality authorization of charter schools. During the authorizer interview, participants explained (and documents confirmed) that SAM's director has attended the National Association of Charter School Authorizers (NACSA) conference multiple years, attending sessions on authorizer oversight and monitoring, school operations, student learning and contract renewal. The director also regularly attends Minnesota Association of Charter School Authorizers (MACSA) meetings and Minnesota Department of Education (MDE) sessions focused on expanding authorizer practices such as the review process, high-quality schools and data practices. PD is also aligned with the authorizer's three organizational goals. SAM's director has participated in sessions around improving student achievement (e.g., best practices exchange amongst teachers and instructional leaders); realizing replication of high-performing models (e.g., high-quality schools); and increasing the number of disadvantaged students served (e.g., race equity in education).
- According to the AAP, SAM provides PD in three areas: authorizer practices, school operations and student achievement. For example, the Conference Recap document shows that the authorizer participated in PD in all of these areas, including: NACSA sessions on ensuring fair and open enrollment practices (2015), performance management and accountability (2015), strategies for serving English language learners (ELs) (2016), how to monitor a struggling school (2016), preserving school autonomy (2017), oversight tools for authorizers (2018) and family communication strategies (2019).
- Annual reports between FY 2016 and FY 2020 show that the authorizer's leadership attended PD sessions regularly, including those offered by MDE, MACSA and NACSA. Additionally, the authorizer attended joint sessions with Friends of Education, another Minnesota-based authorizer. The authorizer received a federal Charter Schools Program Grant (CSP grant) in FY 2018 and used the funds to attend the Learning and the Brain conference in New York in May 2019.
- There is no documentary evidence to show that PD is measured and evaluated. During the interview, the authorizer stated that, although there is an appreciation for the PD that takes place, SAM does not directly measure the results or impact of the PD on its authorizing practices. Additionally, although the authorizer submitted a reflection to MDE after attending the CSP grant-funded conference, the reflection included intentions for how the professional development would be transferred, but no measures or evaluations.

**Key Evidence:**

- A.5 Narrative
- FY 2016 Authorizer Annual Report – Student Achievement Minnesota
- FY 2017 Authorizer Annual Report – Student Achievement Minnesota
- FY 2018 Authorizer Annual Report – Student Achievement Minnesota
- FY 2019 Authorizer Annual Report – Student Achievement Minnesota
- Conference Recaps
- MDE Grant
- 18.06-06 SA CSP Authorizer Grant
- 19.05-20 MDE SAM Training Reimbursement Request May 2019
- MAPES Director Asst Director Notes 021720
- Authorizer interview, March 17, 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 commensurate with its stated budget, and the needs and responsibilities of the portfolio of charter schools.

- The budget within the AAP projects a growth of schools within its portfolio from three in FY 2016 to a minimum of six in FY 2020, with per school expenditures of approximately \$17,400. SAM's budget shows stable revenue versus expenses between FY 2016 and FY 2019, with three schools in the portfolio. During this time, statutory fees increased due to an increase in pupil enrollment. As a result, personnel expenditures also increased. In FY 2020 SAM reduced its portfolio to two schools, meaning that projected statutory fees decreased by \$15,371. The projected budget for FY 2020 includes a line item for \$15,000 for a donation. A history of donations to SAM in 2016 and 2019 show that reliance on donations is not unprecedented. Based on the current budget, the per school expenditure is approximately \$26,600, which is greater than the proposed budget within the AAP.
- Resource allocations are currently sufficient to fulfill authorizing responsibilities, including technical assistance, and replication and best practice dissemination. Review of income and expenditures between SY 2015 and SY 2019 show that expenditures per school have remained relatively stable, with an increase in spending in SY 2019. During the interview, the authorizer explained that this increase was due to additional technical support for West Side Summit Charter School, which was an underperforming school prior to its closure, and that, without as much intensive need, spending on technical support will decline. The budget confirmed this decreased allocation. In the narrative, the authorizer states that although its resource allocation is small, it can draw upon its partner organization for additional resource support as needed.
- According to the A.3 narrative, SAM's authorizing staff has remained stable at FTE 0.5 over the term of the review. Currently, the director is 0.4 FTE and external consultants represent 0.1 FTE. The budget shows that, over the review term, the authorizer increased expenditures by 35 percent to ensure that schools with increasing enrollments had sufficient support. Although the size of the portfolio (e.g., number of schools) has declined from three to two, student enrollments have increased, which supports the authorizer's decision to maintain its current staffing level.
- The authorizer's resource allocation aligns with NACSA Standard #1, Agency Commitment and Capacity. Based on its narratives (A.3 and A.6) and in alignment with its budget, SAM conducts a frequent review of portfolio needs and authorizer staffing, and does not compromise quality oversight. Charter school leaders verified that the quality of its authorizing practices – especially around evaluation and monitoring – has remained consistent.
- SAM's budget shows that it allocates resources to achieve nationally recognized quality authorizing standards. Between FY 2016 and FY 2020, when anticipating deficits, SAM's budget shows that it re-budgeted and redistributed resources on an annual basis and in contrast to the budget submitted with the AAP. For example, budgeted technical support decreased between 2019 and 2020 with the closure of West Side Summit Charter School. As stated above, the authorizer anticipated less need for intensive technical support for its two operational schools, which are both listed as high-quality by the Minnesota Department of Education.

**Key Evidence:**

- A.6 Narrative
- A.3 Narrative
- AAA/AAP
- Budget
- Income and Expenditures
- Statement of Expenditures 2015-16, 2016-17
- Authorizer interview, March 17, 2020
- Charter school leader interview, April 8, 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 has a clear policy to address conflicts of interest in all decision-making processes concerning the portfolio of charter schools.

- The Charter School Program Guide includes a conflict of interest (COI) policy that: 1) prohibits any individuals to work with the authorizer who have a financial, personal, or other interest; 2) prohibits any individuals from working with both the authorizer and one of its schools in any capacity; and, 3) ensures that any individual who may not be in a position to make an objective, merit-based decision withdraw from the decision-making role. Signed conflict of interest statements by external consultants, as well as interviews with the authorizer and charter school leaders, confirmed that the conflict of interest policy is implemented by SAM.
- SAM's AAP states that the policy will be implemented through written instructions to all reviewers and decision-makers, applicants, or schools. Review of school board meeting notes of Math and Science Academy from January 2017 and October 2019 and a corresponding presentation show that SAM shared its conflict of interest policy with the school's board members. Additionally, signed statements confirm that external reviewers received written instructions in alignment with the conflict of interest policy in the Charter School Program Guide.
- SAM ensures that all application review and decision-making processes are free of conflicts of interest, and requires full disclosure of any potential or perceived conflicts. As stated above, signed conflict of interest statements by external reviewers confirm that the policy has been implemented successfully.
- During interviews, both the authorizer and charter school leaders indicated that they have not encountered conflicts of interest.
- During the evaluation, MDE did not inquire about a specific conflict of interest.
- As stated above, when asked about conflicts of interest, charter school leaders verified that the conflict of interest policy is located in the Charter School Program Guide and that they have no knowledge of any conflict of interest that has surfaced during the review term.

### **Key Evidence:**

- A.7 Narrative
- Charter School Program Guide
- COI Avoidance
- COI Implementation
- Charter School Contract with Math and Science Academy
- Charter School Contract with Northeast College Prep
- Charter School Contract with West Side Summit Charter School
- Authorizer interview, March 17, 2020
- Charter school leader interview, April 8, 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 4-Exemplary

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

- The Charter School Program Guide outlines SAM’s statutory relationship to the charter schools within its portfolio. This includes six clear guiding principles to ensure the autonomy of the schools is safeguarded, including language stating that SAM does not manage or operate any charter school and that any technical assistance offered by SAM and its authorized schools is voluntary and not required. During the interview, the authorizer repeatedly referenced its commitment to ensuring its schools’ autonomy. For example, the authorizer stated that it had offered schools support and training around DDI, but explained that some schools chose not to participate in this technical assistance.
- As stated above, the authorizer’s policy, as outlined in the AAP and the Charter School Program Guide, states explicitly that the authorizer does not manage or operate any charter school nor require schools to engage in technical assistance. Additionally, section 2.2 of contracts with Math and Science Academy, Northeast College Prep and West Side Summit Charter School specifically address the autonomous relationship between SAM and its schools. The language describes the independent status of the schools, stating, “The school is not and shall not be deemed to be a division or part of SAM.” The contract also states, “SAM shall have no authority or control over, and no responsibility for, any aspect of School operations, including operational, administrative, or financial responsibility for the school.” Section 2.3 of each contract confirms that financial obligations are separate between SAM and its authorized school.
- The Charter School Program Guide specifically states that the authorizer oversees the school board’s management and operation of the school, monitors and evaluates the fiscal, operational and student performance of its authorized schools, and holds schools accountable for their performance. Contracts with Math and Science Academy, Northeast College Prep and West Side Summit Charter School state specifically that contract renewal decisions will be based “substantially” on the school’s attainment of its academic outcomes/goals as outlined in the contract. Additionally, contract language waives reporting requirements for high-performing schools, which, according to the Charter School Program Guide and the authorizer during the interview, decrease the amount of unnecessary work for schools. The implementation of this policy was confirmed in an email between the authorizer and Math and Science Academy dated July 5, 2018 confirming that, because of the school’s high performance, they qualified for a contract reporting waiver. Finally, the authorizer regularly collects data from schools, as seen in its monthly reporting documentation such as board meeting minutes and financial reports.
- The authorizer’s policy aligns with NACSA Standard #1: Ongoing Oversight and Evaluation, as the authorizer’s policies respect day-to-day operations and communicate its role with the school. The authorizer requests monthly reports on school performance, financials, operations and compliance, and it conducts regular site visits.
- 67 percent of respondents to the Charter School Leadership survey agreed or strongly agreed that the authorizer preserves the school board’s autonomy over policy matters related to operating the school. One respondent (33 percent) neither agreed nor disagreed. 100 percent of participants agreed with the statement that, in the five past years, they have felt that SAM has supported their school’s autonomy.

- During the charter school leader interview, participants consistently verified that the authorizer has protected the school's autonomy. They explained that the authorizer holds schools to the contract expectations, and when it shares opportunities or ideas for improvement, stresses that decisions should be made by the school and its school board.

**Key Evidence:**

- A.8 Narrative
- Charter School Program Guide
- School Autonomy
- AAP
- Charter School Contract with Math and Science Academy
- Charter School Contract with Northeast College Prep
- Charter School Contract with West Side Summit Charter School
- Abbreviated School Site Visit Prep and Report
- MSA Board and Finance Review 2016
- MSA Board and Finance Review 2017
- MSA Board and Finance Review 2018
- MSA Board and Finance Review 2019
- MSA Board and Finance Review 2020
- MAPES NECP July 2016 Review 031720
- MAPES NECP July 2017 Review 031720
- MAPES NECP July 2018 Review A 031720
- MAPES NECP July 2018 Review B 031720
- MAPES NECP July 2019 Review 031720
- MAPES Cohort One Charter School Leadership Survey – Student Achievement Minnesota
- Authorizer interview, March 17, 2020
- Charter school leader interview, April 8, 2020

## 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:** Although the authorizer self-evaluates some of its internal ability (e.g., capacity and practices), it does not do so in a way that is intentional and planned.

- The AAP states that the authorizer will use criteria and practices to self-evaluate in four areas, including: leadership evaluation, authorizer procedure review, staffing adequacy and internal process. In the narrative, the authorizer stated (and SAM service contract logs confirmed) that SAM’s director and board chair meet on a regular basis to share insight, reflect and problem-solve. Although core consultants completed self-evaluations in 2015, which was noted in the FY 2016 annual report, it is unclear how the authorizer used these self-evaluations to inform or analyze its own capacity. Additionally, documentation shows that the authorizer collected data through a survey regarding a new charter school application review, but the results do not indicate when the survey was administered or how the data collected was used. Annual reports for FY 2017 and FY 2018 state that, in addition to comparing and contrasting their practices with another authorizer in order to better align their processes, the authorizer conducted a needs assessment to identify deficiencies and determine professional development; however, there was no documented evidence of the needs assessment. Furthermore, the annual reports do not provide a detailed explanation as to how SAM self-evaluates its internal authorizing ability. Finally, review of the Continuous Improvement document shows that the authorizer has a system by which to evaluate its schools; however, this document does not relate to the authorizer’s evaluation of its own capacity and infrastructure. During the interview, the authorizer explained that it measures its capacity and practices by how informed it is about what is happening across its portfolio of schools. For example, the authorizer stated that it evaluates its own capacity based on whether it knows when its schools are in crisis, if they are not in compliance, and if there are complaints or grievances that have been submitted.

### Key Evidence:

- A.9 Narrative
- AAP
- Continuous Improvement Practices
- Self-Evaluation
- FY 2016 Authorizer Annual Report – Student Achievement Minnesota
- FY 2017 Authorizer Annual Report – Student Achievement Minnesota
- FY 2018 Authorizer Annual Report – Student Achievement Minnesota
- FY 2019 Authorizer Annual Report – Student Achievement Minnesota
- Authorizer interview, March 17, 2020



## **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 3-Commendable

**Finding:** The authorizer engages with other authorizers to improve the authorizing community of practice.

- Documents, including agendas, emails and presentations, show that SAM’s director engages with other authorizers (locally and nationally) through participation at different conferences, meetings and associations, as well as through informal sharing of practices with other Minnesota-based authorizers. The authorizer participated in national conferences such as NACSA (2016) and monthly MACSA meetings. According to the narrative, SAM’s director was the chair of the MACSA standards group between 2017 and 2018 and was part of the Charter Application Review MACSA Cohort that met regularly.
- SAM regularly shares best practices with and provides technical assistance to other authorizers. Review of MACSA board meeting minutes confirm that SAM’s director attended board meetings regularly and presented on topics including Effective Practices (2020) and Principles and Standards (2018). A NACSA leadership conference session evaluation from 2016 shows that SAM’s director led shared insights on how being a school leader has informed her authorizing. Emails and a hand-written thank-you note from representatives at MDE show that SAM’s director participated in a working group to update the “high-quality charter school” designation methodology in terms of expansion and replication. In the narrative, the authorizer explained (and emails confirmed) that it shared best practices at the Audubon Center of the North Woods in 2017.
- There is no documented evidence to show that SAM is sought out by other authorizers to share best practices and/or technical support.

**Key Evidence:**

- A.10 Narrative
- MACSA Cohort
- MACSA Standards
- MDE Initiative
- FY 2016 Authorizer Annual Report – Student Achievement Minnesota
- FY 2017 Authorizer Annual Report – Student Achievement Minnesota
- FY 2018 Authorizer Annual Report – Student Achievement Minnesota
- FY 2019 Authorizer Annual Report – Student Achievement Minnesota
- Dissemination National Level
- Authorizer interview, March 17, 2020

### **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 4-Exemplary

**Finding:** The authorizer consistently complies with reporting, submissions and deadlines set forth in Minnesota Statute.

- According to MDE, since the start of the current term, the authorizer was 100 percent compliant in all areas including: attendance at MDE trainings; statement of income and expenditures; renewed charter contracts; and, authorizer annual reports.

**Key Evidence:**

- A.11 Narrative
- MAPES Compliance Data Spreadsheet – Student Achievement Minnesota

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

**MAPES Performance Measures A Rating for Student Achievement Minnesota is 3.15.**

### Performance Measures A: Rating Drivers

- SAM has a clear mission for charter school authorizing that is “to improve student achievement through the quality authorization of charter schools.” The mission drives all aspects of SAM’s work, including oversight, monitoring and technical support.
- The authorizer’s staff has experience and expertise in academics, operations, finance and legal matters.
- The authorizer has a clear conflict of interest policy and consistently preserves the autonomy of its charter schools in all aspects of its work, while holding schools accountable to statutory expectations set forth in its contracts.
- The authorizer maintains a budget that is sufficient to oversee and monitor its portfolio of schools, as well as to provide technical assistance and ongoing support.
- While SAM has organizational goals, they do not contain specific and measurable criteria that the authorizer can use to monitor its progress. Its statement of goals also includes vague or missing timeframes. Additionally, while one of the goals includes increasing the number of disadvantaged students served, definitions for this group are not consistent between the AAP, interviews and progress monitoring documents.

### Performance Measures A: Recommendations

- Revise organizational goals to ensure that they include clear criteria and timeframes for achievement (specific, measurable, achievable, realistic and time-bound).
- Create documented processes and mechanisms by which to measure internal capacity, such as school leader and board member surveys and meeting minutes.
- In the budget, plan for contingencies in the event that projected donations are not realized or are not sufficient to fulfill authorizing responsibilities.

## 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 has clear and comprehensive approval criteria and process standards to rigorously evaluate new charter school proposals, and its decisions and resulting actions consistently align with its stated approval and process standards, promoting high-quality charter schools.

- SAM implements a comprehensive, detailed, merit-based and transparent new charter school application process comprised of a written application, capacity interview and other due diligence as required. SAM's new school application requires applicants to complete six sections including an executive summary, description of the school foundation, pre-operational planning, fiscal soundness and other (e.g., additional model-specific information). Additionally, one section is for required attachments. Each section has sub-sections that ask the applicant to describe in detail aspects of their proposed school. For example, in school foundation, sub-sections include need; management organization; vision and mission; purpose, learning program, student achievement, and accountability; school founders; and, info regarding school founders. The authorizer includes instructions and format requirements for new applications, as well as a timeline that guides applicants from submission through approval/denial decision issuance. There is an accompanying rubric by which to rate the application. The capacity interview allows the authorizer to follow-up or receive clarification around the submitted application. Finally, if an application is denied, the authorizer provides reasons for the denial and encourages re-application based on the authorizer's feedback. The application, timeline and the rubric are accessible on the authorizer's website.
- According to narrative and corresponding documents (i.e., emails between the authorizer and applicants), SAM received four new applications in SY 2019 and three new applications in SY 2020. All of these were denied for being incomplete after an initial desk-review. As a result, the authorizer shows consistent application of decision-making in alignment with application expectations.
- The process documented in the Charter School Program Guide and in communications around the new charter school application and decision-making process, review and feedback align with SAM's AAP.
- SAM's application and decision-making process align with NACSA Standard #2 Application Process and Decision-Making. The process is clear and transparent, with clear criteria outlined in the rubric. Additionally, the authorizer does not limit applications by model or type of application (new or existing). SAM has a clear strategy, as shown through their denial of incomplete applications, not to accept new applications with unmet expectations.
- SAM's application and decision-making process reflect a clear strategy to promote high-quality charter schools. For example, the authorizer explained during the interview that the team of external reviewers is comprised of individuals with the expertise necessary to review high-quality schools in the fields of academics, finance, operations and law. An example of the application review process for Sapolo Academy includes an evaluation of the school's ability to improve learning, provide effective school operations and governance, ensure fiscal soundness and successfully implement the model and charter. Additionally, the authorizer is supportive of applicants who seek to replicate existing successful models, and those who can effectively serve disadvantaged students.

- The Charter School Program Guide shows that SAM has maintained the same application process over the term of the review period, although the authorizer did not receive any applications until 2019. No new schools were approved, as all new applicants failed to meet the requirements outlined in the Charter School Program Guide and new school application.
- Survey results from the New Charter School Application Reviewer Survey show that 100 percent of respondents agreed or absolutely agreed that the application was unbiased, had clear questions and had clear training. During the interview, charter school leaders stated that they had not opened new schools during the review term but provided verification of the process and standards that are included in the Charter School Program Guide.
- SAM's new charter school application and decisions have resulted in high-quality charter schools. According to MDE's 2018 High-Quality Charter School List, two of the schools in SAM's portfolio (Math and Science Academy and Northeast College Prep) were recognized as high-quality charter schools.

**Key Evidence:**

- B.1 Narrative
- March SAM Application New School
- Application New School Evaluation Rubric
- Application Orientation
- Application Solicitation
- SAM New Application Instructions and Format
- SAM Charter School Application Timeline
- Application Process
- Application Desk Review
- Application Process Example Sapolo
- MDE High Quality Charter School List (2018)
- Application Survey
- NACSA SAM Alignment
- Minnesota Department of Education website
- Charter school leader interview, April 8, 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 has clear and comprehensive approval criteria and process standards to rigorously evaluate proposals of existing charter school expansion requests and other interim changes, and its decisions and resulting actions regarding charter school expansion and interim changes align with its stated approval and process standards and promote the growth of high-quality schools.

- The authorizer has a different application for grade-level or site expansion, early childhood program expansion, replication and change of authorizer. The Charter School Program Guide outlines application processes for high-quality charter school replication, grade-level or site expansions for existing SAM schools and early learning program expansion for existing SAM schools. Applications for grade-level or site expansion requires applicants to provide detailed explanations in three areas: evaluation of planned growth; evaluation of current school academic and school performance; and, evaluation of legal and fiscal performance. The applications for early learning program expansion require applicants to provide detailed information regarding the program, enrollment process and transition plan, assessments, instructional practice, community-based services, screening and how it will measure program success. Each application includes a rubric by which the application will be evaluated. The application for replication, which is available on the authorizer’s website, collects academic, fiscal and legal performance evidence, and the change of authorizer application, also available on the website, requires applicants to submit evidence on a school’s academic and operational performance and fiscal soundness. All of the applications provide clear application questions and outline transparent procedures, timelines and evaluation criteria.
- SAM received no charter applications for site or grade-level expansion, replication, early learning programs or authorizer transfer during the authorizing term. Additionally, no school openings were scheduled. This was confirmed by annual reports and by the authorizer during the interview. While there was a supplemental affidavit submitted for Math and Science Academy for expansion, that affidavit was retracted. The authorizer confirmed during the interview that the affidavit was submitted in error, explaining that the school’s former authorizer had already received approval for the school’s expansion, and thus, the affidavit was unnecessary. A review of applications for each process shows that, in addition to completion of their application, the authorizer provides a written review of their application, engages in a capacity interview and does due diligence as required. All applicants must also meet “ready to open” requirements, which are detailed in the Charter School Program Guide and contract and include: a pre-opening evaluation to ensure an on-time school opening; a list of required tasks, deadlines, and reporting obligations; a school leader; personnel; financial management; and, enrollment. SAM’s Charter School Start-up Progress Form/Task List, referenced in the program guide and available on the authorizer’s website, includes over 100 tasks to be completed in the following areas: facilities; financial management/business plan; governance and management; learning program; systems; school culture; leadership, personnel and policy development; regulatory issues; services to students (i.e., special education and English learners); enrollment and marketing; accountability; and, community partnerships. This task list also includes significant target dates by which portions of the tasks must be completed.

- SAM's decisions and resulting actions align with its AAP. The AAP outlines the review processes for expansion, early learning programs and change in authorizer/transfer, which are reflected in the authorizer's documents. Additionally, it refers to the "ready to open" process included both in the contract and Charter School Program Guide. Although the authorizer did not have school expansions or changes in authorizer, its initial support of Math and Science Academy's expansion application corresponds with its AAP.
- SAM's interim accountability processes are aligned with NACSA Standard #2: Application Process and Decision-Making, because the authorizer has clear guidance on its website, has rigorous and comprehensive application questions, and states its chartering priorities in its Charter School Program Guide. The authorizer encourages replication, the timeline is reasonable, the process and application are clear and transparent, and the application requires that schools show how they will serve students with diverse needs. The process includes a written review, a capacity review and due diligence of any other items.
- There is a defined and transparent application process for replication and expansion, and the authorizer has a strategy in place for ensuring that it promotes high-quality charter schools. During the interview, the authorizer explained that, although the two schools within its portfolio are high-quality, it is reluctant to support expansion in areas where charter schools already saturate the market. Additionally, it explained that evidence shows declines in performance after expansions, and the authorizer wants to ensure that performance does not erode. A May 2019 correspondence from the authorizer to Math and Science Academy shows that, in response to the school board's discussion about expansion/replication, the authorizer offers to share challenges and successes that other schools have experienced in order to support the process.
- Level 2 indicators were met for four years but not for the authorizer term to date. In May 2015, MDE placed SAM in corrective action due to its MAPES performance rating of 'Approaching Satisfactory', including a rating in B.2: Interim Accountability Decisions that fell below 'Satisfactory'. The authorizer exited corrective action December 2015.

**Key Evidence:**

- B.2 Narrative
- Charter School Program Guide
- SAM High Quality Charter School Replication Application
- SAM Replication Application Instructions and Format Requirements
- SAM Existing Schools/Change of Authorizer Charter School Application & Evaluation Rubric
- SAM Charter School Start-Up Progress Form/Task List
- FY 2016 Authorizer Annual Report – Student Achievement Minnesota
- FY 2017 Authorizer Annual Report – Student Achievement Minnesota
- FY 2018 Authorizer Annual Report – Student Achievement Minnesota
- FY 2019 Authorizer Annual Report – Student Achievement Minnesota
- School Replication
- 15.06-03 MAPES Notice of Corrective Action – SAM
- 15.12-04 MDE Letter – SAM Out of Corrective Action Status - FINAL
- Authorizer interview, March 17, 2020
- Charter school leader interview, April 8, 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 4-Exemplary

**Finding:** The authorizer consistently executes contracts that clearly define material terms and rights and responsibilities of the school and authorizer.

- According to MDE records, 100 percent of the authorizer’s renewal contracts were statutorily compliant. As stated above and confirmed by MDE, the authorizer did not have new charter school applications, change in authorizer contracts, or merger charter contracts. SAM’s charter contracts clearly state that the schools’ primary goal is to improve student achievement in alignment with MN Statute 124E.10 Subd. 1. (11) charter school law.
- Contracts with Math and Science Academy, Northeast College Prep and West Side Summit Charter School all clearly outline the rights and responsibilities of the authorizer and school. For example, Article II of the contracts specifically outlines the independent status of the school; Article III describes the oversight responsibilities of SAM; and, Article VI explains the responsibilities of the school board (e.g., operations and evaluation of student achievement). The contracts describe the responsibilities of the authorizer, which are to conduct oversight, monitor performance and ensure compliance with laws and the contract, including a written evaluation of performance. The contract details performance requirements, processes and procedures for oversight, review and renewal. It also preserves the school’s autonomy while simultaneously ensuring that the school meets performance standards.
- SAM’s contracting practices are consistent across its portfolio of charter schools. The Charter School Program Guide outlines the process for renewal, including an application that includes school performance, proposed goals and other information. The authorizer explained during the interview (and documents confirmed) that the authorizer schedules all compliance responsibilities and sends written reminders to the charter schools prior to September 1<sup>st</sup>, when the renewal application is due. The authorizer explained that it renewed three charter contracts, one in 2018 and two in 2019, using the same process. Documentation from the charter renewal process with Math and Science Academy shows that the school’s renewal process included a review of academic performance, finances, operations and compliance. The authorizer then completed a renewal evaluation that included the proposed term of the renewal contract based on the school’s performance.
- According to the MDE MAPES Compliance Data, the authorizer’s renewal contracts for Math and Science Academy, Northeast College Prep and West Side Summit Charter School were all executed no later than the first day of the renewal period, meeting the deadline.
- Article IX of the contract states that operation and administration of the charter school and the improvement of educational outcomes over time may require an appropriate amendment. Further, it states that change in existing law may also require the contract to be altered or amended. In December 2015, the authorizer amended its contract with Northeast College Prep to replace language related to nationally normed assessments. In September 2019, the authorizer amended its contract with Math and Science Academy to update its admissions policies and procedures. In both of these cases, the amendments were for material changes and not in lieu of conducting a renewal evaluation.
- Level 2 indicators were met for the term to date. SAM’s initial contracts with its schools met statutory requirements and included the rights and responsibilities of the school and authorizer, as did the renewal contracts with Math and Science Academy, Northeast College Prep and West Side Summit.

- During the interview, charter school leaders verified that they have contracts that include clear definitions for the material terms of the contract, as well as the rights and responsibilities of both the school and authorizer.

**Key Evidence:**

- B.3 Narrative
- MAPES Compliance Data Spreadsheet – Student Achievement Minnesota
- Charter School Program Guide
- Charter School Contract with Math and Science Academy
- Charter School Contract with Northeast College Prep
- Charter School Contract with West Side Summit Charter School
- MSA Charter Renewal Process Start to Finish
- NECP Charter Renewal
- MSA Charter Renewal Evaluation
- MSA Amended Contract Approval
- Charter School Contract Amendment – Northeast College Prep
- Charter School Contract Amendment – Math and Science Academy
- Authorizer interview, March 17, 2020
- Charter school leader interview, April 8, 2020

#### **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 4-Exemplary

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

- According to the MDE records, 100 percent of the authorizer’s renewal contracts met the statutory performance standards. Contracts with Math and Science Academy, Northeast College Prep and West Side Summit Charter School show goals for academic performance (including whether the school is improving pupil learning), financial performance, operational performance and legal compliance.
- SAM’s contracts with Math and Science Academy, Northeast College Prep and West Side Summit Charter School define clear, measurable and attainable goals that include absolute proficiency, comparative proficiency, growth for reading and math; achievement gap reduction for math and reading (although student groups are not identified); use of nationally normed assessments; and school (kinder) readiness, when relevant. For example, the absolute proficiency goals for Northeast College Prep state that, by the conclusion of SY 2020 and each year forward, 60 percent of students enrolled for four years at the school will meet or exceed proficiency on the reading MCA. The contracts include goals that meet or exceed expectations for comparative public schools as well (i.e., local public school district). Non-academic goals within the contracts vary with each school. For example, Math and Science Academy goals focus on student attendance, professional development, staff diversity, stakeholder satisfaction and volunteer activity. In addition to the academic and non-academic goals, the contracts include a governance and management plan and an administration and operations plan with specific performance measures aligned with school management and oversight, as well as financial performance goals tied to external audits. The contract outlines remediation steps that will be taken by the authorizer in the event that the school fails to make adequate progress toward achieving its academic outcomes or financial targets, or to comply with applicable law or other requirements. The steps include: providing notice to the school leader or board chair noting areas of concern for correction; providing formal notice to the board chair asking for an improvement plan if the situation remains uncorrected; providing notice to the board of charter revocation/termination to inform of the withdrawal of the charter authorization.
- Review of the authorizer’s contracts with the schools across its portfolio show that the performance outcomes and standards are consistent, including academic, non-academic, financial, operational and legal targets listed above. Sub-goals are similar, with a focus on reading and math proficiency.
- SAM’s AAP refers specifically to indicators in the charter schools’ contracts around academic, financial and operational performance.

- As stated above, the authorizer follows up on performance standards regularly. For example, according to the contract, all schools must meet school reporting requirements, must do monthly board data and finance reporting, complete an annual financial audit and complete an annual site visit. The authorizer completes a report after the annual site visit and creates a summary of major performance indicators. Notices of concern between the authorizer and two of its schools show that the authorizer holds its schools accountable to their outcomes and standards. For example, SAM sent a notice of concern to West Side Summit Charter School in February 2017 regarding a deficit in the FY 2017 operation budget and in the school's failure to meet its academic comparative proficiency and growth targets. SAM sent a notice of concern to Northeast College Prep in December 2019 highlighting the decreasing fund balance and increased operational deficit.
- SAM's contracts with the charter schools in its portfolio align with NACSA Standard #3: Performance Contracting, because they include the performance standards by which they are evaluated, use objective measures such as student proficiency, and define the sources of the data (i.e., Fastbridge). There are academic, financial and operational standards, including those for disadvantaged students, and the authorizer tracks progress regularly against these performance standards via data trackers, school visits and financial audits.
- SAM's performance standards reflect a clear strategy to promote high-quality charter schools. According to the contracts and the authorizer interview, SAM primarily considers academic performance when evaluating a school for renewal. As such, contracts with Math and Science Academy and Northeast College Prep show that academic performance goals are weighted between 50-55 percent. When West Side Summit did not meet the academic performance standards set forth in its contract, SAM limited the renewal contract to a two-year term, and the school ultimately closed when it realized it would not meet the authorizer's outcomes and performance standards.
- Level 2 indicators were met for the authorizer term to date. The authorizer's contracts have generally maintained the same performance standards and expectations since the beginning of the review term, as measured by contracts that date to 2015, notices of concern from 2017 and data trackers beginning in SY 2016.
- During the charter school leader interview, participants verified the different components of the contracts, including academic performance and financial goals, and legal and operational compliance expectations. They provided examples of academic and non-academic goals, as well as expectations around positive fund balances. All participants agreed that they are held accountable to the performance outcomes and standards. Survey results show that 100 percent of respondents strongly agree that the contracts have clear provisions and terms, clearly outline the responsibilities of schools and authorizers, and show that contracts are understood and that performance standards are clear and measurable.
- According to the MDE data, in 2018 both Math and Science Academy and Northeast College Prep were identified as high-quality charter schools.

**Key Evidence:**

- B.4 Narrative
- AAP
- MAPES Compliance Data Spreadsheet – Student Achievement Minnesota
- Charter School Program Guide
- Charter School Contract with Math and Science Academy
- Charter School Contract with Northeast College Prep
- Charter School Contact with West Side Summit Charter School
- Data Tracking Tools
- Major Indicators Summary
- Annual Audit Review
- NECP Site Visit Report
- WSS Notice of Concern
- NECP Notice of Concern
- NACSA SAM Alignment
- MAPES Cohort One Charter School Leadership Survey – Student Achievement Minnesota
- Authorizer interview, March 17, 2020
- Charter school leader interview, April 8, 2020

## **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 AAA/AAP?*

**Performance Level Rating:** Level 3-Commendable

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

- SAM's oversight and monitoring criteria are detailed in its contract with its charter schools. For example, Article III Section 3.1 outlines the oversight responsibilities of the authorizer and Article VI outlines the school's operating requirements. Exhibit M of the contracts provides a detailed explanation of the ongoing authorizer oversight in the areas of academic performance, fiscal performance, operations and legal compliance.
- According to interviews with the authorizer and charter school leaders, and confirmed through documentation, in addition to reviewing each school's annual report, the authorizer conducts annual site visits, financial audits, compliance reviews and performance reviews. It regularly attends meetings of the school's governing board and conducts mandated reporting. The authorizer evaluates each school's academic, operational and financial performance against measures identified in the charter contract. Board and finance reviews have a detailed checklist of items for review such as processes, procedures, data and evidence. Additionally, the site visit reports include a "360 review" which includes academic, financial, operations and compliance reviews. The reviews are used to determine contract renewal, nonrenewal, revocation, or termination.
- SAM's oversight activities align with its stated oversight and monitoring processes in its AAP. Specifically, oversight and monitoring processes outlined in the authorizer's contract with its charter schools, within its Charter School Program Guide and in its reporting and evaluation templates (i.e., site visit reports, board and finance reviews) are consistent with the AAP.
- The authorizer's oversight and monitoring practices are consistent across the portfolio of charter schools. Site visit reports for Northeast College Prep and Math and Science Academy, as well as board and finance reviews for both schools, showed that SAM conducted evaluation and monitoring in the same manner for its schools.
- Documents reviewed align with NACSA Standard #4: Ongoing Oversight and Evaluation because the monitoring systems, which include annual site visits, monthly board meeting oversight, financial audits and required reporting, are comprehensive. The site visits are a "360 review" of schools, which includes curriculum and instruction, parental involvement and school culture. The communication around oversight is also clear and transparent, including multiple notices and a summary in the site visit report. Accountability systems are streamlined with waivers of reporting. Written reports are provided and stated consequences are enforced.
- SAM's processes for ongoing oversight of the portfolio of charter schools reflect a clear strategy to promote high-quality charter schools. The oversight aligns with NACSA standards for high-quality schools, and includes high standards for academics, finance, operations and law. For example, as stated above, the authorizer's site visit reports are color-coded to track annual feedback and ensure that schools are building upon the authorizer's findings, board and finance reports are reviewed by the authorizer on a monthly basis, and the authorizer conducts regular reviews to ensure that its schools are meeting the operational and legal compliance.

- Level 2 indicators were met for four years but not for the authorizer term to date. In May 2015, MDE placed SAM in corrective action due to its MAPES performance rating of 'Approaching Satisfactory', including a rating in B.5: Authorizer's Processes for Ongoing Oversight of the Portfolio of Charter Schools that fell below 'Satisfactory'. The authorizer exited corrective action December 2015.

**Key Evidence:**

- B.5 Narrative
- AAP
- MSA Board and Finance Review 2016
- MSA Board and Finance Review 2017
- MSA Board and Finance Review 2018
- MSA Board and Finance Review 2019
- MSA Board and Finance Review 2020
- MSA Site Visit Report
- NECP Site Visit Report
- NECP Board and Finance Review FY 2017
- NECP Board and Finance Review FY 2018
- NECP Board and Finance Review FY 2019 (part A)
- NECP Board and Finance Review FY 2019 (part B)
- NECP Board and Finance Review FY 2020
- NACSA SAM Alignment
- Charter School Contract with Math and Science Academy
- Charter School Contract with Northeast College Prep
- Charter School Contract with West Side Summit Charter School
- FY 2016 Authorizer Annual Report – Student Achievement Minnesota
- FY 2017 Authorizer Annual Report – Student Achievement Minnesota
- FY 2018 Authorizer Annual Report – Student Achievement Minnesota
- FY 2019 Authorizer Annual Report – Student Achievement Minnesota
- MAPES Cohort One Charter School Leadership Survey – Student Achievement Minnesota
- MAPES Notice of Corrective Action – SAM
- MDE Letter – SAM Out of Corrective Action Status - FINAL
- Authorizer interview, March 17, 2020
- Charter school leader interview, April 8, 2020

## **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 has clear and comprehensive standards and processes to address complaints and corrective action, and clear mechanisms to ensure intervention.

- SAM's complaint process is outlined in the Charter School Program Guide and includes the following steps: 1) a complainant must submit a written notice of complaint; 2) the authorizer provides the complainant with a notice of receipt; 3) the authorizer conducts a reasonable inquiry; and 4) the authorizer provides a response to the complaint. Complaints can be submitted via the U.S. postal system or on the authorizer's website. The Charter School Program Guide also explains its process for corrective action and includes a form by which to communicate the corrective action to the school. According to the Charter School Program Guide and charter school contracts, the authorizer may use corrective action to address areas not in alignment with performance standards in the contract. This includes academic, legal, financial and operational standards. Section 6.7c of SAM's charter school contract with its schools outlines the steps for remediation, and a monthly review of board minutes and financial reports, as well as a review of academic data and site visits, shows that the authorizer has mechanisms in place to provide intervention.
- According to MDE, it did not receive complaints for SAM during the review term. The authorizer did receive a non-compliance complaint regarding a 504 plan at one school. The authorizer instituted corrective action at two of its charter schools for not meeting academic and financial performance, which is confirmed in a tracking document, annual reports and communications. The procedures followed by the authorizer documented in the examples are in alignment with its AAP.
- All documented interventions and corrective actions are aligned with the performance standards. The documented intervention tracker outlines concerns around enrollment, student achievement and finances based on the data generated from SAM's oversight and monitoring practices (i.e., reports, site visits and annual report cards). Documented evidence confirms that the schools have taken steps to address the letters of concern and implemented corrective action plans, which were approved by the authorizer.
- Standards and processes are aligned with NACSA Standard #4: Ongoing Oversight and Evaluation. Corrective Action is outlined in the contract and Charter School Program Guide, and schools are given adequate notice of intervention and corrective action in writing and with reasonable time to respond. Additionally, the authorizer is proactive as it conducts board and financial reviews monthly.
- Charter school leaders explained that when a complaint is submitted to the authorizer, it first notifies the school of the complaint, then follows up with documentation, conducts an inquiry around the school's course of action, and, when it has gathered sufficient evidence, communicates the authorizer's decision to the school and complainant. This is in alignment with the Charter School Program Guide. Participants stated that submitted complaints have involved procedures, and that MDE and the authorizer have found the schools to be in compliance. Neither school has needed to submit corrective measures.



**Key Evidence:**

- B.6 Narrative
- AAP
- Charter School Program Guide
- NECP Intervention Example
- Charter School Contract with Math and Science Academy
- Charter School Contract with Northeast College Prep
- Charter School Contract with West Side Summit Charter School
- FY 2016 Authorizer Annual Report – Student Achievement Minnesota
- FY 2017 Authorizer Annual Report – Student Achievement Minnesota
- FY 2018 Authorizer Annual Report – Student Achievement Minnesota
- FY 2019 Authorizer Annual Report – Student Achievement Minnesota
- NACSA SAM Alignment
- Authorizer interview, March 17, 2020
- Charter school leader interview, April 8, 2020

## **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 2-Satisfactory

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

- During the interview, the authorizer explained (and a review of the Charter Support document confirmed) that it has primarily focused on offering technical assistance through its consultants around improving instruction. For example, the authorizer has offered extensive support and development to its charter schools around data-driven instruction (DDI), and offered support around DDI proactively to schools through PD workshops. The authorizer stated that its 0.1 FTE core consultants' primary focus is to provide technical support to its charter schools around curriculum and instruction. Answers provided by core consultants on the Professional Development Feedback (surveyed in 2015) show that they helped shape the focus of technical assistance. For example, the consultants stressed the need for better support around assessments and DDI, which then became a focus for the authorizer's technical support during the review term.
- During the interview, the authorizer stated that schools in its portfolio have not specifically approached the authorizer to solicit support around finance, governance and operations. The authorizer stated, however, that it intervenes to make sure that schools are following statute or it voices concerns with school boards, while maintaining its schools' autonomy. This was confirmed by charter school leaders.
- Review of the Charter School Support, Development and Technical Assistance document showed (and charter school leaders confirmed) that most of the PD offerings are focused on instruction. An email sent from the authorizer shows that in September 2017 it notified its schools about a charter school board training workshop offered by the Minnesota School Boards Association (required by statute). It also shared information from MDE regarding required reporting and documentation, such as the annual charter school assurances document. Charter school leaders stated that the technical support around instruction provided by SAM is robust and led by experts. They also stated that, while they do not currently receive technical support outside of academics, if they were unable to resolve problems regarding operations, law and finance using their internal resources, they would seek out SAM's director with questions. A review of SAM's annual reports between FY 2015 and FY 2019 states that it provided professional development opportunities to its schools in topics including: Charter School Lease Pricing and Practices (2016), Every Student Succeeds Act (2016), Board of Directors Networking & Best Practice Event (2017, 2018, 2019).
- The authorizer stated, and charter school leaders confirmed, that all technical assistance is offered with the school's autonomy preserved. For example, the authorizer focused some of its technical assistance offerings on DDI and provided opportunities for schools to train their staff on using assessment data more effectively. The authorizer explained that one school declined to participate while another worked with the authorizer around implementing DDI.
- The support and technical assistance provided to schools, which is focused on continually improving academic performance, is aligned with the authorizer's mission. Two of the authorizer's schools have been deemed high-quality and the authorizer was consistent in providing opportunities to both schools. The authorizer explained that West Side Summit Charter School, which did not meet its performance goals and earned a two-year renewal contract, received much more intensive technical assistance in an effort to improve its academic performance before it ultimately closed.

- Although support and technical assistance are regularly offered and based on demonstrated need, there is no documented evidence to show that it is designed to prevent problems. The authorizer stated that it has worked to identify trends to improve academics, such as DDI through annual site visit data, meeting notes between school leaders and SAM's director, as well as consultant surveys. However, while documentation shows that SAM provides feedback from site visits in its reports, there is no documented evidence to show how the authorizer designs its technical assistance to prevent problems.

**Key Evidence:**

- B.7 Narrative
- 20.05-22 B.7 MAPES 0520 Narrative
- Professional Development Feedback
- Charter Support
- FY 2016 Authorizer Annual Report – Student Achievement Minnesota
- FY 2017 Authorizer Annual Report – Student Achievement Minnesota
- FY 2018 Authorizer Annual Report – Student Achievement Minnesota
- FY 2019 Authorizer Annual Report – Student Achievement Minnesota
- NECP DDI
- Technical Assistance Examples
- Website Depository
- MAPES Tech Support Emails 031720
- 20.05-22 B.7 0520 MSA Class Measures Report
- 20.05-22 B.7 0520 Authorizer Identified Need
- Authorizer interview, March 17, 2020
- Charter school leader interview, April 8, 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 has a plan and consistently promotes model replication and dissemination of best practices of high-quality charter schools.

- The authorizer has worked to share and replicate best practices and, through its technical support, instituted a plan for the successful model replication of DDI. SAM's AAP states that it will organize quarterly instructional forums for school staff to share best practices, in addition to spotlighting instructional practices through its website depository. In the narrative and during the interview, the authorizer stated that it regularly meets with directors and assistant directors of its schools to share best practices (i.e., portfolio school director cohort forum); charter school leaders confirmed the quarterly meetings during the interview. The authorizer's technical assistance documents show that, based on feedback from its core consultants in 2015, it offered assistance and support to its portfolio of charter schools to help them implement DDI and effective use of assessment. Charter school leaders stated that the authorizer distributes awards during the summer conference to highlight schools that are exhibiting best practices (e.g., high-quality board meetings or financial practices).
- During the authorizer interview, participants stated that, based on SAM's offer of technical support, Northeast College Prep began to institute DDI as a practice in 2016.
- The implementation rubric for Northeast College Prep confirms that the authorizer worked with the school to monitor its state of DDI and assessment between SY 2016 and SY 2018, achieving an implementation rate of 82.5 of 100 during SY 2018. It should be noted that one of SAM's organizational goals included in its AAP is to realize the replication of five high-performing models by 2019.

### **Key Evidence:**

- B.8 Narrative
- AAP
- School Expansion Replication
- School Replication
- FY 2016 Authorizer Annual Report – Student Achievement Minnesota
- FY 2017 Authorizer Annual Report – Student Achievement Minnesota
- FY 2018 Authorizer Annual Report – Student Achievement Minnesota
- FY 2019 Authorizer Annual Report – Student Achievement Minnesota
- MAPES Best Practices Replication 031720
- Authorizer interview, March 17, 2020
- Charter school leader interview, April 8, 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 4-Exemplary

**Finding:** The authorizer has clear and comprehensive standards and processes to make high-stakes renewal and termination decisions. The authorizer’s renewal and termination decisions consistently align with its stated renewal standards and processes and promote high-quality charter schools.

- The Charter School Program Guide outlines the requirements and process for renewal, which include an application that has schools reflect on their performance aligned with the existing charter contract; proposed goals for a renewal contract; and, other information relevant to renewal. Standards and processes for renewal are included in the authorizer’s contract with its charter schools and its program guide. These include a review of academic performance (i.e., proficiency, growth, district and state comparisons, student groups and MDE awards), an annual site visit, a financial review (i.e., fund balance, audit results, MDE School Finance Award, demonstrated fiscal responsibility), an operational review (i.e., mandated report submission, website postings, monthly board data) and a legal compliance review. Program guide and contract language states, and interviews with the authorizer and school leaders confirmed, that, when determining renewal, the authorizer considers student achievement as the most important factor, although it considers other factors such as financial sustainability. The authorizer stressed that its priority is to improve per pupil performance and student achievement.
- A review of renewed contracts with Math and Science Academy, Northeast College Prep and West Side Summit Charter School shows that the authorizer granted different renewal terms to each of its schools based on each school’s academic, fiscal, operational and/or legal performance. For example, Math and Science Academy received a five-year contract based on meeting its overall academic performance goals, showing financial viability and being consistently compliant. Northeast College Prep received a four-year contract because, while it met some of the academic performance goals, it did not meet all of them as outlined in its previous contract. SAM granted West Side Summit a two-year renewal contract based on the fact that the school did not meet its academic performance goals, despite its financial viability and clean audits. The authorizer explained that, while the school was not meeting its academic performance goals, it was making progress with some of its students and surpassing comparative schools among some students groups, and it wanted to provide an opportunity for the school to improve its practices before terminating the contract. West Side Summit voluntarily terminated its charter contract with SAM effective June 2019, which, emails show, was supported by the authorizer due to its low academic performance and operational ineffectiveness. Based on these three renewals, the authorizer’s decisions are consistent with its AAP.
- SAM’s renewal decisions are consistent with its AAP. As stated above, the Charter School Program Guide and contracts outline the standards that the charter schools must meet in order to be renewed by the authorizer. The different contract terms align with expectations set forth in the AAP, stating that SAM will primarily consider per pupil achievement and schools’ academic performance in its decision-making.

- The authorizer’s standards and processes align with NACSA Standard # 5: Revocation and Renewal Decision Making, because its renewal processes include an evaluation of objective evidence, the authorizer only grants renewals to schools that have met performance goals and measurements and provides a performance report to each school. The authorizer’s standards and processes also align with NACSA Standard #5 in that the authorizer clearly communicates the criteria for revocation in its charter and the charter includes a school closure plan.
- SAM’s renewal standards and processes reflect a clear strategy to promote high-quality charter schools. For example, in the contract, schools are required to set rigorous, ambitious, but attainable charter contract academic performance goals and measurements (Exhibit F). The authorizer is also transparent in expectations, performance and outcomes as set forth in the contract and communications. The processes hold underperforming schools accountable as evidenced by the two-year renewal with West Side Summit Charter School and the intensive technical support provided. West Side Summit Charter School terminated its contract with SAM at the end of the academic year.
- Level 2 standards were met for the authorizer term to date. The Charter School Program Guide, which has been in place since 2015, has outlined the standards and processes for renewal, as have all contracts with schools that have been in place over the term of the review.
- SAM’s renewal decisions have resulted in high-quality charter schools. The decision to provide West Side Summit Charter School with a two-year contract and intensive technical assistance shows that SAM identified concerns regarding the school’s academic performance and intervened in support of student achievement. As stated above, the school terminated its contract with SAM and closed after one year. The two remaining schools in SAM’s portfolio have been identified by MDE as high-quality in terms of academic achievement and financial and operational compliance.
- During the charter school leader interview with representatives from Math and Science Academy and Northeast College Prep, participants consistently verified the standards and processes for charter contract renewal. Survey results show that 100 percent of respondents agree or strongly agree that the authorizer assesses progress towards academic, financial and operational goals with respect to renewal, that they are satisfied with the actions of the authorizer in terms of renewal, that the renewal process is clear and transparent, that the rationale is clear, that the authorizer follows timelines, and that the authorizer’s assessment of renewal is high-quality.

**Key Evidence:**

- B.9 Narrative
- AAA/AAP
- Charter School Program Guide
- Charter School Contract with Math and Science Academy
- Charter School Contract with Northeast College Prep
- Charter School Contract with West Side Summit Charter School
- Renewal Tracker
- School Improvement Meeting
- School Viability Tool
- WSS Termination Clarification
- WSS Termination Process
- Authorizer interview, March 17, 2020
- Charter school leader interview, April 8, 2020

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

**MAPES Performance Measures B Rating for Student Achievement Minnesota is 3.65.**

### Performance Measures B: Rating Drivers

- SAM has a clear and comprehensive application process for new charter schools and existing charter schools that are seeking to expand or replicate. The process includes standards and transparent procedures for decision-making, to ensure that the authorizer supports and promotes the growth of high-quality schools.
- The authorizer's contracting practices are consistent across the portfolio, define the material terms of the contract, and include clear academic, financial and operational performance outcomes and standards. The academic performance goals are rigorous but attainable, in alignment with the authorizer's vision of improving student achievement and closing academic gaps.
- The authorizer regularly and consistently provides monitoring and oversight of the charter schools in its portfolio, through ongoing review of monthly board meetings and financial reports, academic data and annual reports. The authorizer intervenes when a school is not statutorily compliant, or if it has a concern regarding a school's financial viability.
- The authorizer works to disseminate best practices to its portfolio of schools and, as a result, has seen schools adopt its model of data-driven instruction.

### Performance Measures B: Recommendations

- Create a formal process by which to gauge demonstrated need for technical assistance and to proactively prevent problems at the school level.



## Appendix A: Authorizer Portfolio Information

**Operational Schools:** Math and Science Academy, Northeast College Prep

**Preoperational Schools:** N/A

**Closed Schools:** West Side Summit Charter School

**Never Opened Schools:** N/A

**Schools that have transferred into portfolio:** N/A

**Schools that have transferred out of portfolio:** N/A

**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.