

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

**Authorizer Information**

**Authorizer:** Volunteers of America – Minnesota (VOA-MN)

**Authorizer Type:** Charitable Organization

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

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

**Characteristics of the Authorizer**

- Volunteers of America – Minnesota (VOA-MN) Charter School Authorizing Program's mission is to improve all pupil learning and all student achievement with service to others.
- VOA-MN was the first non-profit charter school authorizer in the United States of America.
- VOA-MN requires that each of the 17 schools in its portfolio annually engage in planned and meaningful service-learning activities.
- The VOA-MN authorizing team consists of full-time staff as well as contracted program analysts and peer reviewers. VOA-MN's corporate division assists the authorizing program indirectly on an as-needed basis.

**Overall Performance Rating**

**MAPES Overall Performance Rating for Volunteers of America – Minnesota (VOA-MN) is 2.25 - Satisfactory**

**Ratings Summary**

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

A.1: Authorizing Mission (2.5 percent)*	3
A.2: Authorizer Organizational Goals (1.25 percent)**	1
A.3: Authorizer Structure of Operations (2.5 percent)	4
A.4: Authorizing Staff Expertise (2.5 percent)	2
A.5: Authorizer Knowledge and Skill Development of Authorizing Leadership and Staff (2.5 percent)**	4
A.6: Authorizer Operational Budget for Authorizing the Portfolio of Charter Schools (2.5 percent)	2
A.7: Authorizer Operational Conflicts of Interest (2.5 percent)	4
A.8: Ensuring Autonomy of the Charter Schools in the Portfolio (2.5 percent)	2
A.9: Authorizer Self-Evaluation of Capacity, Infrastructure and Practices (1.25 percent)**	0
A.10: Authorizer High-Quality Authorizing Dissemination (1.25 percent)**	2
A.11: Authorizer Compliance to Responsibilities Stated in Statute (3.75 percent)	0
<b>Total Performance Measures A Rating:</b>	<b>2.25</b>

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

B.1: New Charter School Decisions (11.25 percent)*	2
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)	2
Expansion Requests (3.75 percent)	2
Ready to Open Standards (3.75 percent)	2
Change in Authorizers (3.75 percent)	2
B.3: Contract Term, Negotiation and Execution (7.5 percent)	3
B.4: Performance Outcomes and Standards (11.25 percent)	2
B.5: Authorizer's Processes for Ongoing Oversight of the Portfolio of Charter Schools (7.5 percent)	2
B.6: Authorizer's Standards and Processes for Interventions, Corrective Action and Response to Complaints (3.75 percent)**	2
B.7: Charter School Support, Development and Technical Assistance (3.75 percent)**	4
B.8: High-Quality Charter School Replication and Dissemination of Best School Practices (3.75 percent)**	3
B.9: Charter School Renewal and Termination Decisions (15 percent)	2
<b>Total Performance Measures B Rating:</b>	<b>2.25</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 3-Commendable

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

- VOA-MN states its mission in the narrative and on its website: “Volunteers of America-Minnesota (VOA-MN) Charter Authorizing Program guides its authorized charter schools to improve all pupil learning and all student achievement with service to others.” The mission is fully aligned to Minnesota Statute, section 124E.01, which states that the “primary purpose of charter schools is to improve all pupil learning and all student achievement.”
- The narrative explains that VOA-MN is carrying out its mission by chartering schools that provide students with alternative opportunities for academic success so that they may lead successful lives in their homes and communities. Furthermore, per a provision in the school’s contract, each VOA-MN school is required to include service learning in their education programs to further develop collaboration, compassion, integrity, and respect within students, their school communities, and the world. Review of three VOA-MN school websites demonstrates that the schools incorporate the service learning requirement. For example, the Harbor City International School (HCIS) website states, “In order to promote Global Citizenship in our mission, students are required to take two Service Learning symposiums during their time at HCIS. These courses will spend 60 percent or more of the class time performing acts of service and community building.”
- According to review of VOA-MN documentation, VOA-MN implements the mission from the commissioner-approved authorizing plan (AAP). The mission stated in the AAP, “to improve all pupil learning and all student achievement with service to others at its core,” is the mission listed in the VOA-MN Program Manual, annual reports, the narrative, and on the VOA-MN website.
- The VOA-MN mission is verified internally in practice and in documentation at the authorizing organization. For example, in the narrative, the authorizer explains that the mission is practiced through authorizing schools that provide students with opportunities for academic success. The mission is also posted in the authorizer’s Program Manual and website.
- During the authorizer interview, authorizing staff verified the mission, stating that the mission is to authorize schools to increase all pupil learning and all student achievement with an emphasis on service to others. Authorizing staff also described how the mission is aligned with statute and exemplified through practice. For example, they explained that all schools have a service learning plan and many schools excel beyond expectation. However, there is no evidence that VOA-MN’s mission is verified by external references.

**Key Evidence:**

- A.1 Narrative
- AAA/AAP
- VOA-MN Program Manual
- VOA-MN website (<https://www.voamnwi.org/charter-school-authorizing>)
- FY 2019 Authorizer Annual Report – Volunteers of America-MN
- 20.02.07 Amended Contract FIT
- 15.10.16 Revised Final BGCS Charter Contract\_Final Signed
- Spectrum website (<https://www.spectrumhighschool.org/school-mission/community-outreach/on-campus-service-learning>)
- TrekNorth website (<https://www.treknorth.org/html/servicelearning.html>)
- Harbor City International website (<https://www.harborcityschool.org/apps/pages/symposium>)
- MAPES Cohort One Charter School Leadership Survey – VOA-MN
- Authorizer Interview, March 19, 2020
- Charter School Leader Interviews, April 9, 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 clear organizational goals for achievement that are aligned with its authorizing mission and Minnesota charter school statute; however, the goals do not have clear criteria and timeframes for achievement.

- According to the VOA-MN narrative and Program Manual, VOA-MN identifies five organizational goals, including: 1) high-quality school choice (i.e., build a portfolio of charter schools committed to excellence in education, financial management and governance.); 2) quality school performance (i.e., create and maintain systems of charter school performance reviews that support analysis, reflection and planning, and implementation of continuous improvement measures for the charter schools we authorize); 3) service learning; 4) voice in state public policy-making; and, 5) national presence and collaboration. While the goals are clearly related to charter school authorizing, consistent with the AAA/AAP and while they align with the authorizing mission, the goals do not have clear criteria or timelines for achievement. For example, the plan for measuring and monitoring progress listed in the Program Manual states that the authorizer will use the data it gathers and analyzes in preparation for its annual VOA-MN School Network Performance Reports to determine the extent to which they are “building a portfolio of schools committed to excellence” in academic, finance and board governance. During the authorizer interview, authorizing staff stated that the goals are broad because they are less time-bound.

**Key Evidence:**

- A.2 Narrative
- AAA/AAP
- Minutes-19.08.05 VOAMN Authorizing Team
- Minutes-19.03.11 VOAMN Authorizing Team
- Minutes-18.05.11 VOAMN Authorizing Team Reflection Meeting
- VOA-MN Program Manual
- Authorizer interview, March 19, 2020

### A.3 Measure: Authorizer Structure of Operations

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

**Performance Level Rating:** Level 4-Exemplary

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

- According to the organizational flow chart in the AAP and as stated in the narrative, VOA-MN has a clearly defined structure of duties and responsibilities. For example, the VOA-MN authorizing team consists of the following: a chief executive officer (CEO) (.05 FTE) who signs and approves all legal contracts, approves charter renewal or non-renewal decisions; a chief operations officer (COO) (.10 FTE) who approves and affirms decisions of the charter authorizing program manager; a division director (.25 FTE) whose title changed to Director of Education & Mental Health Services in 2018 and who oversees the work of the senior program manager; a senior program manager (1.0 FTE) who is the primary point of contact and who is responsible for daily operations of the program, including day-to-day leadership and oversight of the analysts; a program management assistant (.25 FTE); three contracted performance analysts (academic, finance and governance [1.3 FTE total]). Additionally, VOA-MN contracts with peer reviewers (as needed) to review new or expansion applications. During the interview, authorizing staff explained that the structure of duties and responsibilities sufficiently meets the needs of the portfolio of charter schools given that the structure supports effective implementation of all authorizing duties. The authorizing staff further explained in the interview and in the narrative that other VOA-MN corporate divisions indirectly support the work of the authorizing program, including those in budget and accounting, human resources, communications, information technology, and law firms that the corporation has on retainer.
- Review of the narrative demonstrates that the VOA-MN structure of duties and responsibilities is updated when necessary. For example, the narrative indicates that a volunteer website designer/manager was added in FY 2018 to develop and maintain the network's collaboration website. A program administrative assistant was added in 2019 to support the senior program manager in planning and implementing the VOA-MN Annual Charter School Network Conference, as conference programming continues to expand. Also, according to the narrative and confirmed in the interviews, a school leadership team, which is comprised of peer-elected school leaders who serve in a volunteer capacity, was added in 2018 to support the design of the annual Network Conference, reach out to new leaders and individuals seeking authorization from VOA-MN, and continue to advance the use and usability of the VOA-MN collaboration website.
- VOA-MN has established policies to appropriately manage, retain and safeguard student information and records relating to authorizing. More specifically, the following three policies are provided in the AAP: Confidential and Proprietary Info, HIPAA Privacy Notice Policy and Employee Data Privacy Policy. According to the List of Training Opportunities, all staff participate in annual HIPAA/Data Protection Training webinars.
- During the interview, the structure of duties, responsibilities and staffing levels were deemed sufficient upon internal verification at the authorizing organization. VOA-MN authorizing staff indicated that while the structure of duties, responsibilities and staffing levels had remained consistently sufficient over the term of review, the structure shifted slightly to evenly distribute duties amongst authorizing team members with clearly-defined roles (e.g., each analyst holds responsibility for one area of oversight: governance, academics or finance). Furthermore, they stated that this staffing structure permits VOA-MN to afford high-quality consultants who are accessible anytime.

- As previously mentioned, VOA-MN provides evidence to demonstrate that it has operated with a clear structure of duties and responsibilities and that this structure is sufficient to effectively oversee its portfolio of charter schools over the duration of the authorizer term. Roles are articulated in the organizational chart and in the program-specific position descriptions listed in the Program Manual as well as in the analysts' contractual agreements. According to authorizing staff, the structure permits staff to sustain ongoing relationships with schools, providing schools with a personal contact and more than one VOA-MN representative. It also increases transparency (e.g., one VOA-MN representative reviews board packets while another focuses on finances).
- In the MAPES Cohort One Charter School Leadership Survey, 97 percent of respondents (n=29 total respondents) agreed or strongly agreed that the staffing level of VOA-MN is sufficient to meet the needs of their school. In addition, 100 percent of respondents agreed or strongly agreed that they are familiar with the appropriate contact at the authorizer when a question or concern arises. During the school leader interviews, all participants indicated that they believe that VOA-MN has sufficient capacity to manage the portfolio. For example, participants explained that authorizing staff members offer each school their time and expertise, while providing consistent oversight. Furthermore, interview participants described the structure of duties, explaining that the senior program manager holds overall responsibility, while one analyst holds responsibility for governance, one for academics, and one for finance.

**Key Evidence:**

- A.3 Narrative
- AAA/AAP
- Program Manual
- Independent contracts (academic, finance and governance analysts)
- FY 2020 Program Assistant Contract
- List of training opportunities
- MAPES Cohort One Charter School Leadership Survey – VOA-MN
- Authorizer interview, March 19, 2020
- Charter school leader interviews, April 9, 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 2-Satisfactory

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

- A review of resumes, licenses and certifications shows that throughout the authorizing term, authorizing staff (including the division director, senior program manager, three performance analysts, and peer reviewers) have appropriate experience, expertise and skills in charter school academics, finance, operations and law. For example, the VOA-MN senior program manager has managed the VOA-MN Charter School Authorizing Program since 2011 and previously served as an education specialist/authorizer liaison for charter schools at the Minnesota Department of Education (MDE). The performance analysts hold expertise in finances (e.g., licensed Certified Public Accountant and financial consultant); board governance and operations (e.g., founder of several charter schools); and academics (e.g., former teacher and district assessment coordinator). Further, as stated in the narrative and as described during the interview, the authorizing program is assisted indirectly by VOA-MN corporate divisions on an as-needed basis for operational support and expertise, including budgeting and accounting, human resources, and the services of an insurance trust company, NIT, which authorizes the use of the Lind Jensen Sullivan and Peterson Law Firm as needed.
- A review of position descriptions, referenced in the AAA/AAP and described in the Program Manual, demonstrates that VOA-MN authorizing staff are able to sufficiently oversee the portfolio of charter schools. For example, the division director provides oversight to ensure that all employees adhere to the VOA-MN corporate personnel policies. Day-to-day management of the authorizing program is the responsibility of the senior program manager, who shares responsibility for oversight of the performance analysts with the division director. Performance analysts, working under independent contracts, evaluate the charter schools' annual performance, including fiscal performance, board governance and academic performance. Further, VOA-MN contracts with peer reviewers to support determinations related to new charter school applications, and expansion and change of authorizer requests. Additionally, during the school leader interviews, all respondents agreed that the authorizer has sufficient capacity to manage the portfolio. Participants explained that authorizing staff members are always available to share their expertise, insight and feedback, and consistently help them to help students.
- While authorizing staff has credentials demonstrating experience, expertise and skills in charter school academics, finance, operations and law, no evidence was provided to show that VOA-MN staff experience, expertise and skills align with nationally recognized quality authorizing standards. During the interview, VOA-MN stated that they evaluate practices to assess alignment with nationally recognized quality authorizing standards through ongoing discussions with the Minnesota Association of Charter School Authorizers (MACSA) and National Association of Charter School Authorizers (NACSA); however, no documentation was provided to demonstrate that these discussions take place or that formal processes are in place.



**Key Evidence:**

- A.4 Narrative
- AAA/AAP
- Program Manual
- Haenke License
- Manders CPA Certificate
- Morris Teaching License
- Olsen Teaching License
- Resumes (Maslowski, Donaldson, Perzel, Morris, Manders, Haenke and Olsen)
- Authorizer interview, March 19, 2020
- Charter school leader interviews, April 9, 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 4-Exemplary

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

- Professional development at VOA-MN is intentional and planned to build the knowledge and skill base of leadership and staff. As stated in the AAP, VOA-MN supports the professional development of staff and contractors, who regularly attend training and meetings coordinated by the MDE, Minnesota School Boards Association, MACSA and NACSA. Further, review of the list of training opportunities indicates that the full authorizing team has attended the VOA-MN Annual Network Conference, where topics addressed include school safety, data to drive school quality, service learning and educator licensing. In addition, various members of the authorizing team have attended MDE authorizer meetings; and, the program manager and analysts have attended the MN School Board Association Workshop where best practices in the area of governance were presented.
- Professional development aligns with the authorizer's operations, mission and organizational goals for overseeing its portfolio of charter schools. For example, the list of training opportunities staff attended included sessions to improve pupil learning (VOA-MN Annual Network Conference) and oversight (MDE and NACSA). According to the narrative and review of conference agendas, members of the authorizing team attend annual VOA-MN Network Conferences, which cover a vast amount of topics related to portfolio oversight, including: board training, data practices, employment, school finance, public relations, health and wellness, school facilities and school safety.
- In alignment with the AAP and as confirmed by review of the list of training opportunities (August 2016-November 2019), the professional development sessions VOA-MN staff attended is sufficient to fulfill commitments in the AAP. For example, staff regularly attend trainings and meetings provided by the MDE, MN School Boards Association, MACSA and NACSA.
- Professional development is attended regularly by authorizing leadership and staff; it is ongoing and occurs more than once a year. For example, according to the FY 2019 annual report, the senior program manager participates in monthly MACSA meetings and the annual national conference of NACSA. She also participated in the Multi-Cultural Awareness and Diversity and Data Practices trainings throughout the year, as well as the two-day VOA-MN Network Conference in January 2019, which was full of professional development opportunities, including sessions on school violence and safety, as well as school diversity. In addition, training certificates and expenditure reports (reflecting approved funds for staff members' participation at the 2018 NACSA conference) provide evidence that authorizing staff regularly attend professional development. For example, certificates demonstrate that two staff members completed training provided by the Minnesota School Boards Association in August 2017.

- Professional development attended by authorizing staff is customized to meet the needs of the authorizer leadership and staff. In the narrative, VOA-MN states that strengths and weaknesses are discussed as part of the annual independent contract renewals for staff. Review of the analysts' annual performance review template shows that space is dedicated to "needed or requested areas for future professional development." Further, review of Ms. Olsen's performance review includes a list of professional development topics, including management versus leadership.
- Professional development is measured and evaluated as evidenced by VOA-MN authorizing team meeting minutes (September 11, 2017) and by satisfaction surveys that are administered following the 2017 and 2018 VOA-MN Network Conference to assess the overall organization and content as well as the relevance of topics and appropriateness of training.

**Key Evidence:**

- A.5 Narrative
- AAA/AAP
- FY 2016 Authorizer Annual Report – Volunteers of America-MN
- FY 2017 Authorizer Annual Report – Volunteers of America-MN
- FY 2018 Authorizer Annual Report – Volunteers of America-MN
- FY 2019 Authorizer Annual Report – Volunteers of America-MN
- Academic Analyst Contract Performance Review template
- List of training opportunities
- Training certificates (17.08.08 Rochel MSBA; 17.08.08 Rod MSBA; VOAMN MSBA reg)
- 18.12.05 Expenditure reports/CSP training grant reimbursement request
- Olsen FY 2019 Review with goals and PD (9.12.19)
- 2017 VOA-MN School Survey PD Responses
- 2018 VOA-MN School Survey PD Responses
- 2019 SLT Conference Survey
- Analyst contractual agreement
- VOA-MN authorizing team meeting minutes (September 11, 2017)
- VOA-MNWI Essentials of Management Training
- Authorizer interview, March 19, 2020

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

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

**Performance Level Rating:** Level 2-Satisfactory

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

- As stated in the authorizer interview and as verified through review of the five-year budget, resource allocations for authorizing are at least consistent with the resources-to-portfolio size ratio the authorizer commits to in its AAP. The AAP notes the maximum portfolio size for the authorizer's term, stating that VOA-MN currently has 17 charter schools in its portfolio and is not planning to add additional charter schools at this time. Consequently, no staff increases are anticipated. The five-year budget referenced in the AAP includes salaries for the division director and senior program manager positions as well as "other professional fees."
- The five-year budget shows that VOA-MN's resource allocations are sufficient to fulfill authorizing responsibilities and are commensurate with the needs and scale (i.e., number and size of the charter schools) of its portfolio. The five-year budget referenced in the AAP includes salaries for the division director and senior program manager positions as well as "other professional fees." Furthermore, in the narrative, the authorizer explains that the budget allocations are directly tied to the cost of authorizing, including salaries and benefits; other professional fees (three contracted analysts, the administrative assistant, and professional membership fees); travel and local transportation; conferences and meetings; rent; and administrative fees (VOA-MN corporate support). The budget shows that resource allocations remained consistent over the review term with no growth in portfolio size; and, therefore, are commensurate with the needs and scale of its portfolio.
- There was no growth in portfolio size during the review term; therefore, there was no need for authorizer staff changes in relation to portfolio size.
- While the five-year budget shows that the Level 2 indicators were met for at least four years, the authorizer provides no evidence to demonstrate that resource allocations align with nationally recognized quality authorizing standards for financial resource commitments.

### **Key Evidence:**

- A.6 Narrative
- AAA/AAP
- VOA-MN Five-Year Budget- MAPES 2020
- Authorizer interview, March 19, 2020

## A.7 Measure: Authorizer Operational Conflicts of Interest

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

**Performance Level Rating:** Level 4-Exemplary

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

- The authorizer's conflict of interest (COI) policy for authorizing, provided in the AAP and the Program Manual, demonstrates that a clear conflict of interest policy for authorizing exists and is intentionally implemented. According to review of the conflict of interest policy, the policy protects the VOA-MN authorizing program's interest when it is considering transactions or arrangements that might benefit the private interests of a responsible person or their immediate family members. The conflict of interest policy states that any employee, contractor or peer reviewer must annually disclose conflicts. Furthermore, according to the Program Manual and review of contractual agreements, contracts include a provision (G) precluding contracted staff from working with schools they may be otherwise affiliated with.
- According to review of the conflict of interest policy, VOA-MN avoids conflicts of interest that might affect its capacity to make objective, merit-based application and renewal decisions. Further, the narrative states that the AAP enables VOA-MN employees, contractors and peer reviewers to remain objective. For example, the conflict of interest policy states, and peer reviewers confirmed during the interview, that peer reviewers must sign a conflict of interest identification and confidentiality form, including disclosure of any actual or perceived conflicts. Finally, the conflict of interest policy (as stated in the Program Manual), indicates that authorizers must take affirmative actions to avoid, minimize or otherwise mitigate the impacts of actual or perceived conflicts of interest.
- VOA-MN provides one fully documented example of how it has successfully implemented its conflict of interest policy. A review of VOA-MN conflict of interest and confidentiality (COIC) forms (signed in August 2019) demonstrates that peer reviewers are required to disclose any conflicts of interest or perceived conflicts prior to engaging in the application review process. The New Century School (NCS) Notice to Reviewers clearly requires peer reviewers to read, sign and return the VOA-MN conflict of interest policy before work begins. During the authorizer interview, authorizing staff explained that the policy is self-explanatory; therefore, reviewing the policy within the handbook (and signing off on the handbook) equates to training. Further, the senior program manager stated that it is her role to discuss the policy if a violation is seen.
- As evidenced by signed conflict of interest forms that reviewers are asked to sign prior to beginning a review, the authorizer ensures that application review and decision-making processes are free of conflicts, and requires full disclosure of any potential or perceived conflict of interest between reviewers or decision-makers and applicants.
- As explained during the interview and articulated in the analysts' contractual agreement, implementation of the conflict of interest policy has successfully prevented or resolved conflicts of interest in a timely, fair and appropriate manner. For example, the senior program manager delegates oversight responsibilities of one high school to an analyst as a means to avoid a potential conflict.
- During the evaluation, MDE did not inquire about a specific conflict of interest.

- In the MAPES Cohort One Charter School Leadership Survey, 97 percent of respondents responded that they were familiar with the conflict of interest policy made by the authorizer. In addition, 93 percent of respondents indicated they have not experienced a conflict of interest involving the authorizer. Finally, during the charter school leader interview, the representatives explained that the authorizer has a conflict of interest policy and they state that it is taken seriously.

**Key Evidence:**

- A.7 Narrative
- AAA/AAP
- Gustafson VOAMN NCS COIC Form
- Mortensen VOAMN NCS COIC Form
- Peterson VOAMN NCS COIC Form
- NCS Notice to Reviewers
- Program Manual
- MAPES Cohort One Charter School Leadership Survey – VOA-MN
- Authorizer interview, March 19, 2020
- Charter school leader interviews, April 9, 2020

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

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

**Performance Level Rating:** Level 2-Satisfactory

**Finding:** The authorizer has a clear policy to ensure school autonomy that preserves and supports the essential autonomies of the portfolio of charter schools.

- According to the AAP and review of the charter school autonomy policy in the Program Manual, VOA-MN has a clear policy to ensure school autonomy. The purpose of the policy is to preserve and support the essential autonomies of VOA-MN authorized charter schools according to MN Statute 124E.09. The policy outlines seven guiding principles and states that VOA-MN oversees the school board's management and operations of the school. Specifically, VOA-MN monitors and evaluates the fiscal, operational and student performance of its authorized schools and holds schools accountable for their performance.
- VOA-MN's charter school autonomy policy states that VOA-MN oversees the school board's management and operations of the school, and does not manage or operate any charter school. Further, sections 3.1 and 11.2 of VOA-MN's contract with the school state that "The Authorizer has no authority, control, power, administrative or financial responsibility over the School."
- As demonstrated through review of annual performance reports, VOA-MN's practices to preserve and support the essential autonomies of VOA-MN authorized charter schools align with policy. For example, the FY 2018 academic performance report demonstrates that the authorizer holds charter schools accountable for performance outcomes and compliance with statute rather than on processes and inputs. More specifically, the FY 2018 report uses information found on the Minnesota state report card to outline each school's performance outcomes (growth, achievement gap reduction, graduation and proficiency on the state assessments) but does not evaluate the school's processes and inputs.
- No evidence was provided to demonstrate that the authorizer's policy aligns with nationally recognized quality authorizing standards.

**Key Evidence:**

- A.8 Narrative
- AAA/AAP
- Program Manual
- 20.02.07 Amended Contract AASC
- 2018 Annual School Survey
- MAPES Cohort One Charter School Leadership Survey- VOA-MN
- Authorizer interview, March 19, 2020
- Charter school leader interviews, April 9, 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 0: Unsatisfactory or Incomplete

**Finding:** The authorizer does not self-evaluate its internal capacity, infrastructure and practices to oversee its portfolio of charter schools.

- According to the narrative, VOA-MN conducts authorizing team meetings on a monthly basis where the agenda contains an item for discussions pertaining to capacity and oversight. While review of the monthly team meeting agendas show authorizing staff provide a brief school report based on monthly oversight visits and may share issues of concern, detail provided does not show that the authorizer engages in discussion or self-evaluation to improve their own capacity and oversight practices. Further, according to the narrative, VOA-MN regularly engages with other authorizers to discuss best practices between peers in order to improve the overall quality of authorizing practices; however, no additional evidence is provided to show how this engagement is used to build the authorizer's capacity to oversee its portfolio of charter schools. Furthermore, as demonstrated in performance reviews and contract renewal review forms, VOA-MN annually assesses each staff member's individual ability to fulfill their job duties; however, these are not clearly associated with a self-evaluation process. Similarly, while the authorizer explained during the interview that school leaders complete an annual school authorizer survey to evaluate the authorizer's work and use the results to both inform budgetary decisions and to report aggregate scores to senior leadership, no documentation was provided to show how VOA-MN uses the surveys to engage in a self-evaluation process.

### Key Evidence:

- A.9 Narrative
- AAA/AAP
- FY 2016 Authorizer Annual Report – Volunteers of America-MN
- FY 2017 Authorizer Annual Report – Volunteers of America-MN
- FY 2018 Authorizer Annual Report – Volunteers of America-MN
- FY 2019 Authorizer Annual Report – Volunteers of America-MN
- 2017 School Authorizer Survey
- 2018 School Authorizer Survey
- 17.09.11 VOAMN Authorizing Team Meeting Minutes
- Annual Contract Renewal Review Forms
- Authorizer interview, March 19, 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 2-Satisfactory

**Finding:** The authorizer disseminates best authorizing practices and assists other authorizers in high-quality authorizing.

- As stated in the authorizer interview, VOA-MN engages with other authorizers to improve the authorizing community of practice. As stated in the narrative, VOA-MN's senior program manager sits on the executive committee and chairs the policy committee at MACSA. The FY 2019 annual report also states that the senior program manager is a member of the Executive Committee of MACSA, and chair of the MACSA Policy Committee, and regularly attends MACSA's monthly meetings. During the interview, the authorizing staff stated that VOA-MN participates in ongoing discussions with MACSA and NACSA.
- According to the annual reports and, as stated by authorizing staff during the interview, VOA-MN shares best practices with other authorizers through its website where tools, reports and documents are made publicly available. While authorizing staff stated that they transparently and constantly support other Minnesota authorizers, they also stated that a tracking system has not been developed to document resource sharing and much of it is hard to track given it is web based. While the authorizer provided a copy of the PowerPoint that VOA-MN shared at the October 2018 NACSA conference, as well as email communication (May 19, 2017) between the senior program manager and authorizing staff at Pillsbury United Communities (PUC) to demonstrate that PUC requested information from VOA-MN regarding site visit processes, insufficient documentation was provided to show that the authorizer shares best practices on a regular (e.g., at least annually) basis.

### **Key Evidence:**

- A.10 Narrative
- AAA/AAP
- 2018 NACSA Presentation
- FY 2016 Authorizer Annual Report – Volunteers of America-MN
- FY 2017 Authorizer Annual Report – Volunteers of America-MN
- FY 2018 Authorizer Annual Report – Volunteers of America-MN
- FY 2019 Authorizer Annual Report – Volunteers of America-MN
- PUC example (May 2017 emails)
- Authorizer interview, March 19, 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 0-Unsatisfactory

**Finding:** The authorizer does not regularly comply with the majority of reporting, submissions and deadlines set forth in Minnesota statutes.

- The MAPES Compliance Data Spreadsheet shows that the authorizer was less than 85 percent compliant in all areas stated in the measure origin. More specifically, the spreadsheet shows compliance in 25/34, or 74 percent, of measures. VOA-MN scores 100 percent in some categories, such as authorizer annual report, supplemental affidavit, new charter contract; but lower in other categories, such as income and expenditures (80 percent) and renewed charter contract (56 percent). VOA-MN states in their narrative that in the past two years, VOA-MN fell behind with amending contracts after MDE review; and have since instituted a process to expedite submission of amended contracts back to MDE.

**Key Evidence:**

- A.11 Narrative
- 20.03-26 MAPES Compliance Data Spreadsheet Master – VOA-MN

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

**MAPES Performance Measures A Rating for Volunteers of America-Minnesota is 2.25.**

### Performance Measures A: Rating Drivers

- Review of resumes, licenses and certifications show that over the authorizing term, authorizing staff (including the division director, senior program manager, three performance analysts and peer reviewers) have appropriate experience, expertise and skills in charter school academics, finance, operations and law.
- VOA-MN policies demonstrate clear understanding and implementation of the conflicts of interest and autonomy.
- VOA-MN practices and policies are consistently verified internally and externally at the authorizing organization and by school representatives. Survey and interview results demonstrate that authorizer practices are consistently deemed sufficient by school representatives.
- No evidence was provided to show that the authorizer's practices align with nationally recognized quality authorizing standards.
- No evidence was provided to demonstrate that the authorizer engages in a self-evaluation process.

### Performance Measures A: Recommendations

- Edit organizational goals to ensure that they include clear criteria and timelines for achievement.
- Design (or adopt) and implement processes to evaluate and document VOA-MN's alignment with nationally recognized quality authorizing standards.
- Continue to institute processes to expedite submission(s) of amended contracts to MDE; and, therefore, demonstrate compliance in all MDE areas.

## 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 2-Satisfactory

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

- Review of the new charter school application process (as provided in the Program Manual) demonstrates that the authorizer's application process is comprehensive (e.g., the process includes a desk review and interview stage); includes clear application questions (e.g., provide an overview of the proposed curricula, tools, methods and instructional techniques that support the educational philosophy) and guidance (e.g., four paper copies and one electronic copy); and includes fair, transparent procedures, timelines and rigorous criteria (i.e., applicants must earn a base score of no less than 95/100 points to be approved, and the highest scoring applications will be approved in a competitive process).
- The authorizer's new school decisions and resulting actions are consistent across the portfolio; VOA-MN did not accept any applications during the review term. As the authorizer stated in the authorizer interview, and as explained in the FY 2017 authorizer's annual report, VOA-MN leadership specifically chose not to open new schools during the review term given its belief in smart-growth as well as its decision to place focus on its existing schools before adding schools to the portfolio.
- According to the narrative and as stated during the authorizer interview, VOA-MN did not accept new applications during the review term. Therefore, the authorizer's decisions and resulting actions align with the AAP; the AAP states that VOA-MN is not planning to add additional charter schools at this time.
- While VOA-MN's application and decision process may reflect a clear strategy to promote high-quality charter schools (as evidenced by VOA-MN's high thresholds for approval), no evidence was provided to demonstrate that the authorizer's new charter school application and decision process aligns with nationally recognized quality authorizing standards.

**Key Evidence:**

- B.1 Narrative
- AAA/AAP
- Program Manual
- FY 2016 Authorizer Annual Report – Volunteers of America-MN
- FY 2017 Authorizer Annual Report – Volunteers of America-MN
- FY 2018 Authorizer Annual Report – Volunteers of America-MN
- FY 2019 Authorizer Annual Report – Volunteers of America-MN
- Authorizer interview, March 19, 2020
- Charter school leader interviews, April 9, 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 2-Satisfactory

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

- Review of the expansion application and Ready-to-Open Standards in the Program Manual shows that VOA-MN's application process is comprehensive (e.g., the process includes a desk review and interview stage); includes clear application questions (e.g., questions pertaining to need and enrollment, academic performance, financial sustainability, leadership capacity, etc.) and guidance; and includes fair, transparent procedures (e.g., application review and applicant interview), timelines (e.g., an application must be submitted by July 15<sup>th</sup> of the year prior to the anticipated expansion) and rigorous criteria (i.e., applicants must earn a base score of at least 90/100 points as well as a 'satisfactory' rating in all categories).
- As evidenced by review of the New Century School and the Harbor City International expansion processes and as described by the authorizer during the interview (explaining how the leadership changes at the school level impacted final decisions), VOA-MN's decisions and resulting actions are consistent across the portfolio of charter schools. More specifically, documentation for each school demonstrates the processes included peer review, applicant interview and adherence to criteria (e.g., HCIS did not achieve a 'satisfactory' rating in each category while NCS did).
- Review of application scoring rubrics indicate that VOA-MN decisions and resulting actions align with its AAP. More specifically, review of the New Century School and Harbor City International application scoring rubrics shows alignment with AAP scoring requirements. For example, the AAP states that an applicant must score a minimum of 90/100 points to be approved; therefore, because the New Century School received >90 points, expansion was recommended.
- While the application and decision-making process reflects a clear strategy to promote high-quality charter schools (as evidenced by VOA-MN's high thresholds for approval that are defined in its AAP), the authorizer provides no evidence that the authorizer's interim accountability processes align with nationally recognized quality authorizing standards.

**Key Evidence:**

- B.2 Narrative
- AAA/AAP
- Program Manual
- NCS Rubric Final Peterson
- NCS Expansion Rubric final KM
- NCS Expansion Rubric final KG
- NCS\_Charter School Expansion Application
- NCS Expansion-beginning to end
- MDE to VOA-MN SuppAff- Approved
- NCS response to peer review
- 19.08.14 Desk Review Notification
- 16.06.18 Official VOA-MN Determination on Expansion
- Authorizer interview, March 19, 2020

### B.3 Measure: Contract Term, Negotiation and Execution

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

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

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

- The compliance data spreadsheet indicates that 100 percent of VOA-MN's contracts in its portfolio of charter schools meet current statutory requirements.
- VOA-MN's contracts include specific language around the rights and responsibilities of the school as well as those of the authorizer. For example, the contracts state that schools reserve the right to amend their annual service learning plan and the authorizer will provide ongoing oversight and evaluate student performance.
- A review of contracts within VOA-MN's portfolio confirms that they consistently define the material terms and rights and responsibilities of the school and authorizer.
- MDE data shows that eight of the fifteen contract execution dates were not provided; however, all executed contracts were submitted to MDE before the deadline.
- A review of contracts between the authorizer and its schools shows that they include language specific to amendments, stating that the contract will be amended as warranted by MDE approval of additional school site(s) and/or additional grade levels served, or significant changes in state law. Additionally, contracts state that they may be amended in the event that both the authorizer and school agree that school-specific academic performance goals are not attainable. An email dated January 6, 2020 from VOA-MN to the Tesfa International School states rationale (i.e., a technical amendment based on MDE's contract review document) for the amendment request as well as a request to sign the renewal contract amendment. The amended contract is signed and dated, January 24, 2020; the contract's expiration date is June 30, 2021. The Naytahwaush Community Charter School's contract includes a similar amendment date and also shows that the amendment was made prior to the contract's expiration date (June 30, 2022). In both of these cases, the amendments were for material changes and not in lieu of conducting a renewal.
- Level 2 indicators were met for four years but not for the authorizer term to date. In June 2015, MDE placed VOA-MN in corrective action due to its MAPES performance rating of 'Approaching Satisfactory', including a rating in B.3: Contract Term, Negotiation, and Execution that fell below 'Satisfactory'. The authorizer exited corrective action in December 2015.

**Key Evidence:**

- B.3 Narrative
- AAA/AAP
- 20.04-29 MAPES Compliance Data Spreadsheet Master-VOA
- Charter Renewal Contract (TNHS, KNSA, HCIS)
- 20.02-07 Amended Contract (TNHS, NCCS)
- 20.02-07 TESFA Amended Charter Contract
- 20.02-07 Amended Contract NCCS
- 20.02-25 VOA- Naytahwaush Renewal Contract Review-REVISED
- TESFA Amended Charter Contract
- TESFA contract amendment email
- 17.10-31 VOA-SFCS Renewal Contract Review Rubric
- 15.06-03 MAPES Notice of Corrective Action – VOA-MN
- 15.12-04 MDE Letter – VOAMN-Out of Corrective Action Status - FINAL
- Authorizer interview, March 19, 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 2-Satisfactory

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

- According to the MAPES compliance data spreadsheet, all contracts in VOA-MN's portfolio of schools have been deemed statutorily compliant by MDE.
- Review of VOA-MN's contracts show they define clear, measurable and attainable academic, financial and operational performance outcomes and standards. They also define consequences for meeting or not meeting performance outcomes and standards. Addendum B (School Accountability and Authorizer Oversight System) in the contract demonstrates, and a review of three contracts (Trek North HS, Kaleidoscope and the Athlos Academy of St. Cloud) shows that VOA-MN holds the schools it authorizes accountable in five major areas: academic performance (e.g., student performance on state examinations in comparison to students at schools students may otherwise attend); fiscal management (e.g., balanced budget and audit findings); board governance (e.g., completion of an annual board self-evaluation); management and operations (through formal site visit report), and legal and contractual compliance (through maintenance of a compliance binder).
- Performance outcomes and standards are consistent across the portfolio of charter schools. According to Addendum B, standards (academic, financial performance, school board governance) are uniform for all charter schools while the authorizer reserves the right to have flexibility to reasonably amend these standards/expectations as needed/warranted (e.g., based on sample size being too small).
- A review of contracts demonstrates that contracts align with the performance standards of its AAP. The AAP states that the primary purpose of VOA-MN authorized charter schools is to align with MN Statute 124E.01 and to improve all pupil learning; the performance framework defines clear, measurable and attainable academic, operational and governance performance standards per Minnesota statute; and the performance framework is designed to achieve outcomes that meet or exceed Commissioner expectations, including the five goals of World's Best Workforce. Further, review of the VOA-MN annual reports (academic, board governance and finance) further demonstrate alignment.
- VOA-MN holds charter schools accountable to academic, financial and operational performance outcomes and standards defined in the contract. Standards are contained in the VOA-MN charter contract, Addendum B, site visit reports and annual performance reports.
- According to the FY 2019 VOA-MN Network Academic Performance Report, standards were guided by performance criterion from the MACSA and NACSA; however, the authorizer provides no evidence to demonstrate that the authorizer executes contracts that align with nationally recognized quality authorizing standards.

**Key Evidence:**

- B.4 Narrative
- AAA/AAP
- 20.04-29 MAPES Compliance Data Spreadsheet Master-VOA
- Addendum B\_Complete
- 20.02-07 Amended Contract AASC
- 20.02-07 Amended Contract TN
- 18.01-24 KCS Signed Renewal Charter Contract
- FY 2018 and FY 2019 VOA-MN Network School Finance Report
- FY 2018 and FY2019 VOA-MN Network Governance Report
- FY2018 and FY2019 VOA-MN Network Academic Performance Report
- MAPES Corrective Action Review Rubric FINAL
- Authorizer interview, March 19, 2020
- Charter school leader interviews, April 9, 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 2-Satisfactory

**Finding:** The authorizer 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.

- As described in the Program Manual and in the authorizer interview, VOA-MN has clear processes for oversight and monitoring. For example, the VOA-MN oversight plan is guided by three essential questions:
  1. Is the school's learning program a success?
  2. Does the school exhibit strong financial health?; and
  3. Is the organization effective and well run?

Further, both the manual and the narrative indicate that each VOA-MN charter school annually receives a formal school site visit report, academic performance report, board governance report and school finance report. Each year, VOA-MN conducts a minimum of two site visits (formal and informal) as well as two school board meeting observations. Additionally, schools are required to complete board packets, share financial information with VOA-MN, and report information contained in the VOA-MN Annual Submission Calendar according to the due dates listed in the document (e.g., updated board information is due on August 5 and December 1).

- According to the FY 2019 annual report and Addendum B of the contracts, VOA-MN conducts charter oversight that competently evaluates academic, financial and operational performance and monitors compliance with applicable law. Addendum B indicates that each school is held accountable for meeting the outcomes adopted by the Commissioner for all public school students under Minnesota Statutes, section 120B.11. Schools must demonstrate compliance with state and federal statutes. VOA-MN's financial standards serve as the basis to monitor member schools' financial health and compliance with state and federal laws, including proper use of public funds.
- A review of oversight documents demonstrates that VOA-MN oversight activities align with its stated oversight and monitoring processes in its commissioner-approved authorizer application (AAA) and AAP. For example, review of the Trek North (TN) High School documentation demonstrates alignment with the AAP; VOA-MN conducted a minimum of two site visits (formal in September 25, 2018 and informal in May 14, 2019) and two school board meeting observations (September 11, 2018 and May 14, 2019). Additionally, TN High School received a contract evaluation report prior to contract renewal.
- VOA-MN oversight and monitoring practices are consistent across the portfolio of charter schools. Consistent practices can be observed in the monthly oversight and financial oversight logs, as well as in the TN High School and the Lakes International Language Academy (LILA) site visit reports.
- The authorizer's processes for ongoing oversight of the portfolio of charter schools reflect a clear strategy to promote high-quality charter schools. According to the AAP, VOA-MN publishes three annual network reports (academic, board governance and finance), and distributes awards in each of the three areas to schools meeting all standards to promote high-quality charter schools. In addition, a review of annual reports from FY 2016 to FY 2019 shows that the academic program analyst (or specialist in FY 2016) held responsibility for publishing the academic performance report for all VOA-MN's operational schools. However, the authorizer does not provide evidence to show that oversight processes align with nationally recognized quality authorizing standards.

**Key Evidence:**

- B.5 Narrative
- AAA/AAP
- Addendum B – School Accountability and Authorizer Oversight System
- FY 2019 TN Formal Site Visit Rubric
- FY 2019 TN Contract Evaluation Reports
- 19.09.10 TN Board Observation
- 15.11.12 TN Board Observation Rubric
- 15.11.12 Formal Site Visit Rubric
- 2018.March\_VOA Governance Monthly Oversight Log\_Haenke
- 2018.December\_VOA Monthly Oversight Log\_Haenke
- 2019.March-May Oversight Log\_Haenke
- 2017.October\_VOA Monthly Oversight Log\_Haenke
- FY 2019 Monthly Financial Oversight Log-June-updated
- FY 2019 Monthly Financial Oversight Log- Nov
- FY 2020 Monthly Financial Oversight Log- September-updated
- FY 2020 VOA submission calendar
- FY 2020 VOA School Pledge of Compliance
- Annual Network Reports
- 19.03.14 FY 2019 LILA Site Visit Rubric
- 17-18 and 18-19 School Annual Report Directions
- Authorizer interview, March 19, 2020
- Charter school leader interviews, April 9, 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 2-Satisfactory

**Finding:** The authorizer has clear and comprehensive standards and processes to address complaints, interventions and corrective action.

- According to the narrative, VOA-MN has a defined intervention rubric and complaint process that it uses to implement clear and comprehensive standards and processes to address complaints, intervention and corrective action. The AAP and the Program Manual include a complaint policy that states that its purpose is to provide a procedure to be used to address complaints. Additionally, the policy states that any authorizing team member or contractor receiving a complaint should advise the division director and senior project manager of the complaint and they will then make an initial determination as to the seriousness of the complaint, to determine whether the matter should be referred to the charter school board, administration, MDE or other authorities. Furthermore, when VOA-MN has a concern about the school, or if the school fails to make adequate progress towards achieving the authorizer's contractual standards/expectations for school performance, or to comply with legal or contract requirements, VOA-MN shall determine the appropriate intervention or corrective action as informed by the "range of interventions" table that is provided in the Program Manual.
- A review of communication between VOA-MN and three charter schools shows that VOA-MN decisions and resulting actions are consistent across the portfolio of charter schools and align with the standards and processes described in its AAP. For example, VOA-MN's communication with the Woodbury Leadership Academy (WLA), the Green Isle Community School (GICS) and the KIPP North Star Academy (KNSA) detail intervention actions that were taken, beginning with providing a notice of concern informing them of determination to place the school in intervention, describing rationale as well as requirements (e.g., training and/or submission of a school performance improvement plan), monitoring, as well as release from intervention status or movement to the next intervention level.
- Decisions made regarding complaints, intervention and corrective action align with data generated under oversight and monitoring practices. For example, the January 6, 2016 letter to KNSA states that signs of further weakening performance were identified through routine monitoring; through implementation, compliance or performance reviews; or by other means, including but not limited to failure to meet annual charter contract academic SMART goals for two consecutive years and a significant pattern of declining enrollment or a high percentage of faculty turnover.
- No evidence was provided to demonstrate that the authorizer's standards and processes align with nationally recognized quality authorizing standards.

**Key Evidence:**

- B.6 Narrative
- AAA/AAP
- Program Manual
- 18.06.04 WLA Notice of Release from Intervention
- 17.06.14 WLA\_Intervention Level
- 17.02.09 WLA Release from Intervention
- 16.07.18 WLA Notice of Intervention Level 3
- 16.07.18 WLA Notice of Intervention Level 2
- 16.17 KNSA pdf
- 16.03-03 GICS Notice of Intervention Level 2
- Authorizer interview, March 19, 2020
- Charter school leader interviews, April 9, 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 4-Exemplary

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

- The VOA-MN authorizing program supports and technical assistance are proactive. For example, the VOA-MN authorizing program hosts an annual conference where information and timely topics (such as diversity, employment law, and school health and wellness) are addressed. The authorizer also hosts an online Charter Collaboration Center where school leaders are encouraged to upload and gather sample policies and updates. In addition, according to the narrative, when needed or requested by a school, VOA-MN authorizing team members provide technical assistance or training (such as a work session training provided at WLA on the school's and board's leadership roles and responsibilities as well as board training requirements, etc.) to a school board free of charge to the school.
- According to agenda review (1.10.20), VOA-MN provides supports and technical assistance in a variety of areas, including but not limited to: education finance board training, mental health in the workplace, responding to trauma, management versus leadership, school facilities, school violence prevention, technology-based data-driven organizations and service learning.
- According to the autonomy policy, the VOA-MN authorizing program provides supports and technical assistance in a manner to preserve school autonomy. For example, the autonomy policy states that any technical assistance offered by VOA-MN to its authorized schools is voluntary. Furthermore, as stated in the authorizing staff interview, while the authorizer will point out concerns that a school must fix, they will not name remedies but may offer suggestions for considerations, including networking with other charter schools in the portfolio and using resources uploaded to the collaborative website.
- The VOA-MN authorizing program provides supports and technical assistance in a manner that is consistent across the portfolio of charter schools. Per contract, all schools are required to attend the annual conference. Also, according to the FY2019 annual report, all schools are provided with annual performance reports in the areas of academics, board governance and school finance to support their own progress monitoring and to know what is working at other schools in the portfolio.
- VOA-MN program supports and technical assistance are regularly offered, based on demonstrated need, and designed to prevent problems. For example, VOA-MN hosts an annual conference (where, according to the February 2020 letter from the National Charter Schools Institute (NCSI), organizations such as NCSI present and facilitate break-out sessions for VOA-MN charter school representatives). VOA-MN also sustains ongoing support and collaboration among schools through the collaboration website. As reported in a February 14, 2020 letter from school leadership at Athlos Academies, school leaders find this website valuable as a tool for networking with other charter schools in the portfolio and for finding sample policies and best practices.
- A review of training agendas shows that VOA-MN program supports and technical assistance are designed to promote high-quality charter schools as they include topics related to the schools' academics, finances and operations, and share best practices on topics such as improving student academic performance, student attendance, graduation rates, etc.

**Key Evidence:**

- B.7 Narrative
- AAA/AAP
- FY 2016 Authorizer Annual Report – Volunteers of America-MN
- FY 2017 Authorizer Annual Report – Volunteers of America-MN
- FY 2018 Authorizer Annual Report – Volunteers of America-MN
- FY 2019 Authorizer Annual Report – Volunteers of America-MN
- Annual VOA-MN Network Conference agendas
- WLA Board Work Session (board minutes 1.10.20)
- NCSI VOA-MN letter
- Athlos Academies Corp letter
- VOA-MN collaboration center website  
(<https://sites.google.com/schoolcraft.org/voamncollaborationcenter/>)
- Authorizer interview, March 19, 2020
- Charter school leader interviews, April 9, 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 3-Commendable

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

- VOA-MN has an intentional plan for successful model replication and dissemination of best practices. According to the AAP and Program Manual, VOA-MN encourages replication through its application process by offering a preference weighting (i.e., extra points/preference) toward approval of expansions of high-quality charter schools as measured through a longitudinal data analysis. Further, the Program Manual states that VOA-MN encourages the dissemination of quality, proven school policies and practices, especially within the portfolio's network. Additionally, as the authorizing staff explained during the interview, in 2018 VOA-MN established the VOA-MN School Leadership Team to support dissemination of best practices via the Collaboration Website (in addition to other roles). VOA-MN also distributes annual performance reports (academic, board governance and school finance) that include recognition as means to support school collaboration and to foster awareness so that schools know what is working well at other schools in the portfolio.
- According to review of the VOA-MN Charter Collaboration Center website, one or more identified practices are moving toward dissemination. Topics on the website include human resource training, procurement, curriculum mapping, equal education opportunity, paraprofessional evaluation, cultural competency, and, due to recent events, COVID-19 resources.
- While school representatives raved about the value added by the website (which is further strengthened through relationships that are nurtured through purposeful networking opportunities that are highly encouraged by VOA-MN authorizing staff), no evidence was provided to demonstrate that models/practices have been disseminated to or realized at one or more schools beyond the original.

### **Key Evidence:**

- B.8 Narrative
- AAA/AAP
- FY 2016 Authorizer Annual Report – Volunteers of America-MN
- FY 2017 Authorizer Annual Report – Volunteers of America-MN
- FY 2018 Authorizer Annual Report – Volunteers of America-MN
- FY 2019 Authorizer Annual Report – Volunteers of America-MN
- VOA-MN Program Manual
- Charter Collaboration Center website (<https://sites.google.com/schoolcraft.org/voamncollaborationcenter/>)
- Authorizer interview, March 19, 2020
- Charter school leader interviews, April 9, 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 2-Satisfactory

**Finding:** The authorizer implements clear and comprehensive standards and processes to make high-stakes renewal and termination decisions. Additionally, VOA-MN's renewal and termination decisions consistently align with its stated renewal standards and processes and promote the growth of high-quality charter schools.

- According to the narrative, which a review of documentation confirms, VOA-MN uses transparent and rigorous standards and processes designed to employ comprehensive academic, financial, operational and student performance data to make merit-based renewal decisions and terminate charter schools when necessary, to protect student and public interests. According to the narrative, the AAP and the Program Manual, a school's rating informs the length of its renewal term. For example, to be eligible for a three-year renewal, schools must achieve at least a 'satisfactory' rating, or 70 percent of possible points in the performance framework overall, in addition to meeting the majority of standards in each performance area. For a five-year renewal term, schools must achieve an 'exemplary' rating or 80 percent of points possible. In the case that a school falls below standards, to receive three-year renewal, they must agree to VOA-MN terms and conditions and correct deficiencies in order to have the term extended to the five-year maximum. Alternatively, termination proceedings will commence when a school is not meeting terms and conditions at the end of the first year of the extension. Further, Addendum B of the contract lists the grounds (4) by which VOA-MN may terminate a contract.
- VOA-MN decisions and resulting actions are consistent across its portfolio of charter schools. While annual reports show that no contracts were terminated in the review term, the TN High School 2019 VOA-MN contract evaluation report, as well as Addendum B, which is part of each school's contract, shows that the renewal process is consistent across the portfolio.
- Contract evaluation reports demonstrate that VOA-MN decisions and resulting actions align with its AAP. For example, the VOA-MN contract evaluation report on Trek North HS (January 20, 2016-June 30, 2019) shows alignment with its AAA/AAP. Further, the Trek North HS rating (87.84 percent of points) led to a five-year renewal term. Additionally, according to review of the Athlos Academy of St. Cloud contract, the school's rating (73.42 percent of points) led to a three-year renewal term.
- Finally, while renewal standards and processes reflect a clear strategy to promote high-quality charter schools, no evidence was provided to demonstrate that the authorizer's renewal standards and processes align with nationally recognized quality authorizing standards.

### **Key Evidence:**

- B.9 Narrative
- AAA/AAP
- Addendum B
- Trek North 2019 VOA-MN contract evaluation report
- 20.03.17 AASC Renewal Contract\_revised
- Authorizer Interview, March 19, 2020

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

### MAPES Performance Measures B Rating for Volunteers of America – Minnesota is 2.25

#### Performance Measures B: Rating Drivers

- VOA-MN policies and practices are clear and consistent across the portfolio of charter schools; they are also verified externally with consistent responses from school representatives.
- VOA-MN holds the schools it authorizes accountable in five major areas: academic performance, fiscal management, board governance, management and operations and legal compliance. Annually, VOA-MN will also annually publish three VOA-MN Charter School Network Reports: Academic Performance, Board Governance and Financial Management.
- VOA-MN provides regular support and technical assistance that is designed to prevent problems; it offers this assistance to its schools based on demonstrated need. VOA-MN has designed and implemented a Charter Collaboration Center to enable charter schools within its portfolio to share resources. School representatives state that VOA-MN strongly encourages networking within the portfolio; and that VOA-MN's purposeful relationship building (e.g., through VOA-MN's annual charter school networking conference) adds great value to resource sharing.
- The authorizer has not provided documentation to demonstrate that the authorizer's practices and/or processes align with nationally recognized quality authorizing standards.
- Contracts in the authorizer's portfolio meet current statutory requirements.

#### Performance Measures B: Recommendations

- Design and implement processes to evaluate alignment with nationally recognized quality authorizing standards.

## Appendix A: Authorizer Portfolio Information

**Operational Schools:** Athlos Academy of St. Cloud, Athlos Leadership Academy, Birch Grove Community School, FIT Academy, Green Isle Community School, Harbor City International, Kaleidoscope Charter School, KIPP Minnesota, Lakes International Language Academy, Naytahwaush Community School, New Century School, Schoolcraft Learning Community, Southside Family Charter School, Spectrum High School, Tesfa International School, TrekNorth High School, Woodbury Leadership Academy

**Preoperational Schools:** N/A

**Closed Schools:** N/A

**Never Opened Schools:** N/A

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

**Schools that have transferred out of portfolio:** Cornerstone Montessori Elementary

**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.