

Minnesota Authorizer Performance Evaluation System (MAPES) Performance Report

Authorizer Information

Authorizer: Innovative Quality Schools

Authorizer Type: Single-Purpose

Evaluation Period: January 2016 – December 2020

Report Issue Date: December 7, 2020

Characteristics of the Authorizer

- Innovative Quality Schools' (IQS) mission is to authorize charter schools that are innovative and successful in preparing students to achieve their full potential.
- The authorizer is a single-purpose authorizer. IQS has 30 operational schools and six pre-operational schools, making it one of the larger authorizers in the state.
- The authorizer contracts with StrategicTREC in order to do its authorizing work. In addition to the management leadership team, its staffing model includes "cadres" or contracted non-permanent staff, who are experts in different areas, to oversee each school. Cadres are strategically assigned to schools in order to match their expertise with the school's needs.

Overall Performance Rating

MAPES Overall Performance Rating for Innovative Quality Schools is 2.51: Satisfactory.

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)	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)**	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)	1
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)**	2
A.10: Authorizer High-Quality Authorizing Dissemination (1.25 percent)**	4
A.11: Authorizer Compliance to Responsibilities Stated in Statute (3.75 percent)	3
Total Performance Measures A Rating:	3.00

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

B.1: New Charter School Decisions (11.25 percent)*	3
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)	1
Ready to Open Standards (3.75 percent)	1
Change in Authorizers (3.75 percent)	1
B.3: Contract Term, Negotiation and Execution (7.5 percent)	1
B.4: Performance Outcomes and Standards (11.25 percent)	1
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 overall weight)**	4
B.8: High-Quality Charter School Replication and Dissemination of Best School Practices (3.75 percent)**	4
B.9: Charter School Renewal and Termination Decisions (15 percent)	3
Total Performance Measures B Rating:	2.35

**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.

- The mission of Innovative Quality Schools (IQS), as noted in the commissioner-approved Authorizing Plan (AAP) and the authorizer's annual reports (FY 2016-2019), is "to authorize charter schools that are innovative and successful in preparing students to achieve their full potential..." The authorizer's mission is aligned with Minnesota Statute 124E.01, which states, in part, that "[t]he primary purpose of charter schools is to improve all pupil learning and all student achievement." The IQS Articles of Incorporation explain that the mission, vision and purpose of the authorizer, which are focused on innovation, are aligned with Minnesota Statute 124E.01, which notes that the purpose of charter schools includes the use of different and innovative teaching methods.
- The authorizer carries out its mission by chartering schools that are innovative and seek to improve student achievement. The narrative articulates that IQS focuses on innovation, collaboration, transparency, diversity and transformation for high student achievement and the authorizer's annual reports list innovative practices such as project-based learning and personalized learning that are in place at its authorized schools. The Cadre Handbook lists the authorizer's mission and vision and describes how they align with its strategic initiatives, including: support of innovative practices, alternative means of measuring and oversight focused on student achievement. (It should be noted that the authorizer defines a "cadre" as one person working for the authorizer in an expert capacity for oversight purposes.) The Cadre Handbook also lists innovative schools and their innovations, and details the oversight processes in place to ensure student outcomes. The narrative indicates, and review of the strategic plan, budget document and Management Leadership Team (MLT) Performance Review confirm, that the authorizer conducts a yearly review of its mission and vision and aligns it with the plans for the year.
- The authorizer implements the mission from its AAA/AAP. For example, the AAP (revised in 2019) includes the same mission as what is included in the authorizer's Articles of Incorporation, strategic plan and Cadre Handbook.
- The mission is verified internally in practice and through documentation. All members of the authorizing team confirmed the mission during the interview, explaining that IQS' mission is to charter schools that are innovative and prepare students to achieve their full potential. Additionally, documents and sources such as the authorizer's website, the Cadre Handbook, annual reports, the FY 2019 Annual Report to the Board, a fall training agenda, the new school application and the Annual Budget Document FY 2017-FY2021 include the IQS mission.
- The authorizer's mission is consistently verified externally by school representatives. In the Charter School Leadership Survey, 96 percent of respondents (n=28 total respondents) agreed or strongly agreed that they are familiar with the authorizer's mission. During the school leader interview, all participants articulated IQS' mission as being innovative and student-centered.

- The mission is verified by external references. Screenshots from the websites of BlueSky Online Charter School, Progeny Academy, and the Minisinaakwaang Leadership Academy show that they include the authorizer's mission. Technical Academies of Minnesota's Annual Report from 2019 also includes the authorizer's mission.

Key Evidence:

- A.1 Narrative
- AAA/AAP
- Annual Budget Documents FY17 to FY21
- Cadre Handbook
- IQS: Articles of Incorporation
- FY 2016 Annual Report – Innovative Quality Schools
- FY 2017 Annual Report – Innovative Quality Schools
- FY 2018 Annual Report – Innovative Quality Schools
- FY 2019 Annual Report – Innovative Quality Schools
- IQS New School Application
- IQS Strategic Plan
- IQS Website
- Fall Training Agendas
- MLT Performance Review FY20
- Strategic Plan Framework
- Cadre Assignments
- MAPES Cohort Two Charter School Leadership Survey – Innovative Quality Schools
- IQS MAPES Additional Evidence
- Authorizer interview, September 21, 2020
- Charter school leader interview, September 22, 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 that are aligned with its authorizing mission and Minnesota charter school statute; however, the goals do not include criteria for measuring success or timeframes for achievement.

- Although IQS' organizational goals are clearly related to charter school authorizing and align with state statute, there are no criteria for achievement tied to the goals, nor do they include a specific timeline. The narrative states, and the IQS Strategic Plan and the annual budget document show, that the authorizer has the following strategic initiatives: 1) to design and implement alternative means of measuring student and school success in ways that support innovative instructional practices; 2) to design and implement practices that will ensure that IQS meets and exceeds all performance criteria as determined by the Minnesota Department of Education (MDE); 3) to focus oversight efforts on student achievement; 4) to ensure, through oversight practices, that IQS schools continue to evolve and grow in their commitment to innovation and student success; and 5) to disseminate information on the innovations of IQS schools. However, these strategic initiatives do not consistently include specific metrics, criteria or timelines. In the interview, the authorizer confirmed that it does not have metrics or a timeline.
- The authorizer implements the goals from its AAP. The goals included in the AAP are the same as those in IQS' Strategic Plan. As stated above, two of the goals address innovation, one addresses student achievement and one addresses both innovation and student achievement. The Annual Budget Documents FY 2017 to FY 2021 lists the action steps related to the goals. For example, in 2018, one of the strategic initiatives was to design and implement alternative means of measuring student and school success in a way that supports innovative instructional practices. One of the action steps in the document was to find professional researchers. The NGAPS Year 1 Summary document is evidence that the action item was completed.

Key Evidence:

- A.2 Narrative
- AAA/AAP
- IQS Strategic Plan
- NGAPS Year 1 Summary
- Annual Budget Documents FY 17 to FY 21
- Authorizer interview, September 21, 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.

- The authorizer's roles, responsibilities and duties are detailed in various documents and meet the needs of the portfolio of charter schools. According organizational charts for FY 2016 through FY 2020, Management Leadership Team (MLT) biographies, Cadre Team Lead biographies, and biographies for cadres, the authorizing staff consists of a Board, two members of the MLT, six cadre team leads, and approximately 27 cadres. Cadres and cadre leads are contracted employees and the number of cadres changes based on specific school need. The authorizer assigns five cadres and one cadre lead to each school every year, with members of the MLT assisting as needed. The AAP states that the authorizer has no direct employees and has contracted with StrategicTREC (S-TREC) to serve as the management team. The narrative provides a job description for the MLT that lists responsibilities aligned with the professional experience and expertise of the members. The IQS S-TREC Contract details the oversight duties of the MLT, such as: setting priorities, creating an annual plan with goals, periodic reporting to the board, managing financial operations, managing authorization of new schools, providing oversight, managing cadres, reporting to MDE, leading professional development, and updating the website. The Cadre Leader Contract and the Cadre Contract also list oversight duties such as site visits and annual reports. The organizational charts also show the authorizer's structure of duties. The Cadre Assignments document shows that cadres are thoughtfully assigned to each school based on expertise. The Cadre Handbook, updated annually, contains the roles of the cadres and is reviewed at the start of the school year with all cadres during a training. The fall training agendas and cadre training materials show that the cadres are engaged in regular oversight, with an annual calendar of events, ScoreCards and reports. The authorizer interview confirmed these structures, and stated that five cadres and a cadre lead are assigned to each school. It should be noted that the S-TREC MLT Job Responsibilities attachment in the AAP lists three MLT members through its most recent revision in January 2020, which it only lists two MLT members.
- The authorizer updates structures and responsibilities when necessary. Cadre team leader biographies, as well as the organizational chart for FY 2017, show an addition of a layer of staff in 2017. In 2017, IQS added the Cadre Leader role to help with oversight, and in 2019 the authorizer added a New School Mentor to support new schools, as well as a Cadre on Special Assignment to respond to any issues or trends that surface. The Cadre on Special Assignment document is a job description that includes connecting with school leaders, advising, providing updates and answering questions. The Cadre Leader Contract confirms that this role includes oversight, reports to leadership, meets quarterly with leadership, reviews reports, monitors cadre activities, and meets with school leaders. In 2020, the authorizer added another Cadre Team Leader due to increasing portfolio size, as stated in the narrative and confirmed in the authorizer interview.

- The authorizer appropriately manages, retains, and safeguards school and student information and records. The narrative states that the authorizer manages all data in accordance with the Minnesota Data Practices Act, and that over the term of the authorizing period, IQS received no inquiries or citations related to failing to comply. It should be noted that the authorizer received a data request regarding student discipline at Prodeo Academy in November 2018. While the request was ultimately resolved through an email sent to the complainant by the school on February 6, 2019, MDE issued multiple reminders to the authorizer to fulfill the request in alignment with state statute. The AAP indicates there is a system in place, including a cadre training, to ensure data privacy. In the interview, the authorizer reported that there have been no issues with student privacy. Additionally, the authorizer explained that schools are required to redact any identifying student information when sharing data with the authorizer. Screenshots of the IQS Google Drive, which is used internally at IQS, confirm that the program has permissions set up and access to information is based on each person's role. Finally, in the cadre training materials, the authorizer addresses guidelines for collecting school-based information or evidence, which includes privacy guidelines.
- During the interview, the authorizer verified that the structure of duties, responsibilities and staffing are sufficient. Participants described cadre roles and responsibilities for oversight, confirmed that cadres are assigned to the five key areas included in the authorizer's ScoreCard, and that they meet with the schools several times per year.
- Level 2 indicators were met for the authorizer term to date as seen in the organizational charts from FY 2016 through FY 2020.
- In the Charter School Leadership Survey, 96 percent of respondents agreed or strongly agreed that staffing is sufficient. This was confirmed during the charter school leader interview, when the majority of school representatives verified that the authorizer has a clear structure of duties. Participants described the roles of the cadre, cadre lead and MLT, as well as explained that cadres are assigned by areas of expertise, and that resource allocations are sufficient.

Key Evidence:

- A.3 Narrative
- AAA/AAP
- Cadre Leader Contract
- Organizational Charts FY_15
- Organizational Charts FY_16
- Organizational Charts FY_17
- Organizational Charts FY_18
- Organizational Charts FY_19
- Organizational Charts FY_20
- Cadre on Special Assignment
- Fall Training Agendas
- IQS S-TREC Contract
- MLT Leadership Bios
- Cadre Team Leader Bios
- Cadre Bios
- A.11.1 STREC MLT Job Responsibilities
- MAPES Cohort Two Charter School Leadership Survey – Innovative Quality Schools
- IQS Additional Documents
- Authorizer interview, September 21, 2020
- Charter school leader interview, September 22, 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 appropriate experience, expertise and skills to sufficiently oversee the portfolio of charter schools.

- The authorizing staff has appropriate experience, expertise and skills in academics, finance, operations and law. A review of the MLT biographies shows that the leadership team has experience in education, curriculum and instruction/academics, operations, marketing, school leadership and special populations. One member of the MLT, who has been in place for the entire term, has experience in school leadership, academics, special populations and non-profit management. While there has been some turnover of MLT members over the term, IQS staff experience and expertise has been maintained. For example, several members of the MLT who were in place between 2016 and 2019 brought experience in charter schools, academics and business. Two members who were in place between 2015 and 2017, held experience in charter schools, school leadership, non-profit management and academics; two who were in place from 2019 to 2020, brought experience in school leadership, academics, special populations and charter schools. It is important to note that the MLT had three members from 2015 to 2017 and two members from 2017 to 2020. According to IQS board biographies, the board chair and two other members have expertise in law, one of whom has been in place during the entire term. Several other board members have expertise in academics, business and operations. A review of biographies of cadre team leads shows consistency of experience in curriculum and instruction/academics, evaluation and assessment, finance, school leadership and innovative practices. IQS added cadre team leads in 2018. Furthermore, cadre biographies reflect multiple cadre members' expertise in one or more of the following areas: academics, finance, operations and law.
- The authorizing staff is able to sufficiently oversee the portfolio. As previously noted, IQS created the cadre team leader position in order to oversee cadres and provide general oversight. The IQS Cadre Team Leader Contract, IQS S-TREC Contract, Cadre Assignments, and the Cadre Contract demonstrate that the roles and responsibilities are sufficient for oversight and aligned with the five key areas outlined in the ScoreCard. For example, as stated above, the biographies of the MLT, cadre leads and cadres all show expertise in academics, operations, finance or law. MLT members also bring experience specifically in charter schools. Review of MLT job responsibilities includes: oversight, finance, applications, annual reports, professional development, liaison to Minnesota Association of Charter School Authorizers (MACSA), renewal, contracting, and student performance. The narrative also explains that IQS assigns cadres intentionally to schools based on the cadre's areas of expertise. A review of the cadre assignments verifies this, and also shows that each school has cadres assigned to them with expertise in the key areas of academics, operations, finance, mission and vision. As stated above, the authorizer added several new roles throughout the term in order to provide additional oversight, such as the Cadre Team Lead, the Cadre on Special Assignment and the New School Mentor. In the authorizer interview and the narrative, the authorizer explained that due to the increase in the number of schools, it added cadres and the cadre team leads in order to sufficiently oversee the portfolio.
- Level 2 indicators were not met for at least four years. Although there are cadre members who have experience with finance, IQS did not have a person on staff with the appropriate expertise or skills in charter school finance until 2018.

Key Evidence:

- A.4 Narrative
- AAA/AAP
- IQS Cadre Team Leader Contract
- Cadre Contract
- IQS S-TREC Contract
- Cadre Assignments
- Cadre Team Leader Bios
- MLT Leadership Bios
- MLT Licenses
- Cadre Bios
- MLT Job Responsibilities
- IQS Additional Documents
- Authorizer interview, September 21, 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 consistently builds the knowledge and skill base of its authorizing leadership and staff through professional development. Professional development is aligned with the authorizer's operations, mission, and goals for overseeing its portfolio of charter schools.

- The authorizer intentionally plans professional development to build the knowledge and expertise of staff. During the interview, the authorizer explained that it uses the survey data from cadre trainings as well as informal feedback to intentionally plan professional development. A review of cadre survey results shows that the authorizer asked staff what type of professional development they wanted and planned around the responses. The Summary of Professional Development Opportunities lists each professional development session throughout the term, the topic, and for whom it was planned. For example, the document shows that there were three regular meetings for cadres during SY 2019-20. IQS also facilitated three annual training meetings for cadre members as seen in the fall training (2016) and spring training (2017) documents, as well as MLT reports for August 2016, May 2017, July 2017, October 2017, December 2017, August 2018, November 2018, May 2019, August 2019 and May 2020. Cadre training materials include training on oversight, the IQS ScoreCard, alternative assessments, and reports. The MLT report from 2019 states that the authorizer attended the National Association of Charter School Authorizers (NACSA) conference and a NACSA conference reflections document gives a brief summary of what was learned, including best practices for oversight. The fall training document reviews roles and responsibilities of cadres, including the handbook, and also asks cadres for suggestions for improvement. In the interview, the authorizer described the cadre trainings and topics, including breakout sessions. The authorizer also explained how the spring meeting is used for year-end evaluations. Annual reports and board meeting minutes indicate that the authorizer regularly attended NACSA meetings throughout the entire term.
- Professional development is aligned with the authorizer's goals, mission and vision for oversight. In the AAP, IQS lists professional development goals as: designing and implementing alternative measures for success; designing and implementing practices that meet MDE performance criteria; overseeing student achievement; ensuring that schools evolve and grow in their innovation practices and student success; and disseminating information on innovation. The Next Generation Assessment Portfolio System (NGAPS) Year 1 Summary shows that both professional development and the cadre training agenda from the spring of 2017 aligned with creating alternative measures. This agenda reflects training on reporting, the IQS ScoreCard and oversight. Similarly, the training agenda from winter 2016 includes sessions on charter school law, oversight forms, operations and a review of the annual report. Cadre training materials include information related to innovation, oversight, and best practices for authorizing. IQS holds cadre training three times annually, in alignment with its AAP, as shown in the cadre conference agendas.

- Professional development attended by IQS staff fulfills stated commitments in the AAP. The AAP states that: the IQS MLT Training occurs twice yearly in line with innovations; the authorizer will attend at least bi-annually, state and/or national conferences related to charter school practice; the authorizer will regularly attend MACSA meetings and attend all meetings conducted by the MDE related to authorizer best practices.
- Professional development is attended regularly by authorizing leadership and staff, is ongoing and occurs at least three times per year. Review of agendas and sign-in sheets confirms that IQS management attended MDE trainings between 2016 and 2019. A reimbursement form also shows IQS participated during NACSA conference and Boot Camp in 2019 and a Superintendents Innovation Group training in 2019. One member of the MLT attended cultural competence training as evidenced in the Minnesota Professional Educator Licensing and Standards Board (PELSB) Training document in 2019. MACSA agendas indicate that an IQS representative regularly (e.g., monthly) attended MACSA meetings every year from 2016 to 2020. The Sample Cadre Attendance document shows that multiple cadres attended a meeting in May 2017, and sign-in sheets confirm cadre attendance for May 2016 and August 2016 meetings. IQS MAPES Additional Evidence shows cadre conference attendance from November 2017, May 2018, August 2018, November 2018, May 2019, August 2019, November 2019, and February 2020. Although the Summary of Professional Development Opportunities document indicates that training for MLT, cadres, cadre leaders and board members takes place multiple times per year throughout the term, there is no documented evidence of attendance to confirm this.
- Professional development is customized. Cadres are surveyed after each conference for their feedback on where they need more support, as shown in the cadre conference agendas. As a result, the authorizer designs sessions in the identified areas of need.
- While professional development is evaluated, there is no documented evidence to show that it is measured. Review of reflection notes on what could be improved in 2016, post-cadre conference surveys from 2017, and a survey from 2020, shows that IQS evaluates its professional development offerings in order to improve them. However, there is not documented evidence to show that IQS has measured the impact of its professional development on its authorizing practices and processes.

Key Evidence:

- A.5 Narrative
- AAA/AAP
- Cadre Handbook
- FY 2016 Annual Report – Innovative Quality Schools
- FY 2017 Annual Report – Innovative Quality Schools
- FY 2018 Annual Report – Innovative Quality Schools
- FY 2019 Annual Report – Innovative Quality Schools
- Cadre Survey
- MACSA
- MDE Training – Agendas and sign-in sheets (2016-2019)
- 19.12-27 Authorizer Training Reimbursement IQS December 2019
- NACSA Conference Reflections
- NGAPS Year 1 Summary
- Sample Cadre Attendance
- Spring Training Agenda
- Winter Training Agenda
- IQS Additional Documents
- IQS MAPES Additional Evidence
- Summary of Professional Development Opportunities

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

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

Performance Level Rating: Level 4-Exemplary

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

- IQS' resource allocations for authorizing are consistent with its portfolio size ratio as documented in the AAP. The AAP shows that the authorizer planned an expansion from 22 schools to a maximum of 36 schools. The authorizer currently has 30 operational schools and six preoperational schools. Review of organizational charts shows that in 2017, due to the increase in schools, the authorizer added the Cadre Team Lead position to oversee cadres and build a research and development program. It also added a New School Mentor and a Cadre on Special Assignment. The narrative explains that IQS employs cadres as needed and that each year's cadres are hired on a contractual (not permanent) basis. The annual budget documents (FY 2017 to FY 2021) demonstrate that oversight expenditures increase with the number of schools in the portfolio. As the number of schools in its portfolio increases, funds allocated in the budget for cadres increases as well.
- IQS' resource allocations are sufficient to fulfill authorizing responsibilities and are commensurate with the needs and scale of its portfolio. In the narrative, the authorizer notes that 71 percent of the resources go toward oversight of schools, including cadre and cadre team visits. The aforementioned budget documents show allocations for cadre training, conferences, research and development (e.g., alternative measures for assessment), the website, financial audits, application reviews and fiscal management. The budgets also include a narrative to explain new positions that were added, such as cadre leaders, and how these additions align with the strategic plan. During the interview, the authorizer explained that annual deficits in FY 2019 and FY 2020 were intentional in order to spend down the fund balance and use it on temporary initiatives such as innovation grants.
- IQS staff changes occurred in relation to the portfolio size. According to the authorizer's annual reports, IQS had 22 schools in 2016 and 2017, 25 schools in 2018 and 2019 and was projected to open another five schools in 2020. The authorizer added staff in relation to the portfolio size. For example, as previously noted, in 2017 the authorizer added the Cadre Team Lead and the Cadre on Special Assignment. Annual budgets show that the number of cadres increased from 12 in 2016 to over 30 in 2018, and reflects increasing allocations for cadre compensation. For example, allocations increased from \$365,000 in 2017 to \$430,009 in 2018 in conjunction with the addition of schools.

- Resource allocations align with nationally recognized quality authorizing standards. The authorizer's staffing and financial model align with NACSA's Quality Standard #1: Agency Commitment and Capacity. NACSA states that authorizers should employ personnel at a level appropriate and sufficient to carry out all authorizing responsibilities and commensurate with the scale of the charter school portfolio. As shown above, the authorizer determines its financial needs and devotes sufficient financial resources to fulfill its authorizing responsibilities. The addition of the cadre leadership team and the cadre on special assignment is evidence that IQS allocates sufficient resources particularly when the portfolio size has grown. Additionally, the authorizer allocates funds effectively and efficiently with the public's interest in mind, as funds are directed towards maintaining high performing schools through cadre oversight and leadership, as well as grants and the NGAPS project.
- Level 2 indicators were met for the authorizer term to date as seen in the annual budget documents. The authorizer has maintained staffing levels commensurate with its portfolio of schools, adding staff as needed and in conjunction with the growth of its portfolio.
- The authorizer revises its budgets as necessary in alignment with nationally recognized quality authorizing standards. In the review and comment submission form, the authorizer explains that IQS' finance committee reviews the authorizer's budget on a monthly basis and that the board takes formal action to accept or revise the quarterly financials. Review of IQS board meeting minutes from October 15, 2019 shows that the financials were presented, and that the authorizer's director explained changes made to the projected year-end revenues and expenditures for FY 2020 were tied to new school enrollment shortfalls. According to the minutes, the authorizer adjusted expenditures to compensate for reduction in revenue. As a result, the FY 2020 budget was revised from a year-end projection of \$436.10 net income surplus to \$3,954.90 net income deficit.

Key Evidence:

- A.6 Narrative
- AAA/AAP
- Annual Budget Documents FY17 to FY 21
- B.6 IQS Alignment with NACSA
- Cadre on Special Assignment
- Organizational Chart FY_16
- Organizational Chart FY_17
- Organizational Chart FY_18
- Organizational Chart FY_19
- Organizational Chart FY_20
- Authorizer interview, September 21, 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 1-Approaching Satisfactory

Finding: The authorizer does not consistently implement a clear policy to address conflicts of interest in all decision-making processes concerning the portfolio of charter schools.

- The authorizer has a clear conflict of interest policy that is intentionally implemented. According to the AAP, Article III, Section 1 of IQS by-laws state that “no acting director may be a board member, administrator, teacher, employee or independent contractor engaged on a full time basis by or for any Minnesota chartered school nor have any contract...[to] provide services to any school to be sponsored by [IQS].” Signed statements confirm that board members review the conflict of interest policy annually. The conflict of interest policy is also contained in both S-TREC (MLT) and cadre contracts. It verifies that neither the cadre team member nor their family members have had a potential conflict of interest in the past two years, and that the cadre team member will not have a financial relationship with a charter school with which the cadre member has had a relationship for at least one year after the end of the annual contract. Additionally, the S-TREC contract indicates that the contracted leadership of IQS is bound to the same conflict of interest policy as the board of directors. A review of contracts confirmed that they are signed annually. A reference to the conflict of interest policy is contained in the IQS contract, and a review of school contracts confirms that this reference is consistent throughout the contracts.
- The authorizer works to avoid conflicts of interest that might affect its capacity to make objective, merit-based application and renewal decisions. The narrative states that IQS requires the review of new school applications by at least three members of the MLT or the cadre leadership team. A member of the MLT who is not participating in the review will select reviewers. There are two criteria for reviewer selection, one of which is avoiding a conflict of interest. It should be noted that the authorizer’s MLT currently has only two members (versus the three specified) conducting new school application reviews. Additionally, review of the Change in Authorizer Request Review Rubric for City Academy revised by MDE on January 3, 2019 highlights that the proposed school’s director also serves as a Director of IQS and member of its MLT. This is also confirmed by the MLT biographies document. The authorizer provided an example of how it worked to avoid this conflict of interest. According to documents, IQS tried several solutions to resolve the conflict, including removing the member of the MLT from any oversight duties and creating a firewall between the authorizer and the school. Yet, feedback from MDE in January and March of 2019 reiterated that the proposed solutions did not resolve the conflict of interest. Specifically, the Change in Authorizer Request Review Rubrics from these two dates describe in detail the different ways in which the staffing structure might lead to a perceived or actual conflict of interest, including, but not limited to, the charter contract representing a financial interest between the authorizer and the school, as the school pays an authorizing fee. Further, MDE states that the authorizer’s proposed resolutions do not mitigate the potential for a conflict of interest. MDE denied the change of authorizer requests for City Academy twice (January 2019 and March 2019). Eventually the member of the MLT resigned from her position at IQS in June 2019, ultimately resolving the issue. MDE approved the transfer of City Academy into the authorizer’s portfolio on January 31, 2020.

- The authorizer provides at least one fully documented example of how it implemented its conflict of interest policy; however, implementation was not successful. In the IQS Letter to TLC School of the Arts, the authorizer summarizes the conflict of interest policy implementation. The IQS Letter to TLC School of the Arts demonstrates that IQS, collaborating with the school, responded to MDE requirements for more information in a timely and appropriate manner. For example, IQS submitted an affidavit to MDE, MDE noted deficiencies in the affidavit and requested additional evidence that no conflict exists. In the IQS response to TLC School of the Arts document, MDE asked IQS to clarify the relationship between the partner and the school. In its response, IQS cites the schools' conflict of interest policy and certifies that no board member has a position with TLC. IQS then reviewed the contract between TLC Arts and the Dakota school and requested that TLC Arts provide a list of roles and responsibilities for those assisting the Dakota school board. In the interview, the authorizer stated that it was MDE, not the authorizer who perceived this conflict of interest, and that it was resolved by TLC School of the Arts by ending its relationship with the school (Dakota Arts). However, a letter dated May 8, 2019 from MDE to IQS informs the authorizer that MDE is unable to approve the new school affidavit, citing the unresolved conflict of interest between TLC and the school's management company as one identified deficiency.
- The authorizer does not consistently ensure that the application review and decision process are free of conflicts of interest and require full disclosure of any potential or perceived conflicts. Review of the New School Affidavit Rubric for TLC School of the Arts dated May 8, 2019 describes in detail several conflicts of interest, including between the school and its management company, as well as the fact that two of the founders are "immediate family", which violates state statute. The authorizer did not disclose the conflict of interest between the two individuals; however, this was flagged by MDE. As noted above, the May 8, 2019 letter from MDE to IQS informs the authorizer that MDE is unable to approve the new school affidavit for TLC School of the Arts due, in part, to these unresolved conflicts of interest.

Key Evidence:

- A.7 Narrative
- AAA/AAP
- Cadre contract
- IQS School Contract
- MLT Leadership Bios
- MAPES Cohort Two Charter School Leadership Survey – Innovative Quality Schools
- Cadre Roster School Leader Roster
- IQS Letter to TLC School of the Arts
- IQS Response to TLC School of the Arts
- MDE rubric related to TLC School of the Arts
- 19.05-08 MDE to IQS for TLC New School Affidavit
- 19.05-08 IQS-TLC New School Affidavit Rubric REVISED
- 19.05-08 MDE to IQS for TLC New School Affidavit - FINAL
- 19.01-03 IQS-CA CIA Request Review Rubric-FINAL
- 19.01-03 Commissioner letter re IQS-CA CIA Request
- 19.03-04 IQS-CA CIA Request Review Rubric-INITIAL
- 19.03-26 MDE to IQS for City Academy CIA Request - FINAL
- IQS Additional Documents
- Authorizer interview, September 21, 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 consistently preserves and supports the essential autonomies of the portfolio of charter schools.

- The authorizer has a policy to ensure school autonomy. The AAP indicates that the authorizer has a policy to ensure school autonomy, which is found in section 8.2 of the contract. A review of IQS' contracts with its schools confirms that they each contain language related to IQS Authority/Autonomy. Specifically, and in alignment with the AAP, the contract states that the authorizer does not have "authority, control, power or administrative or financial responsibility over the school." It should be noted that although preservation of school autonomy is included in documents such as the IQS contract and the Cadre Handbook, there is no stand-alone policy within the AAP.
- The authorizer recognizes the school's authority over academics, financials and operations and respects the school's autonomy over day-to-day operations. According to the AAP, and as the Cadre Handbook confirms, the authorizer's responsibility is to create clear expectations for school operation, student achievement, budget and finance and board governance, as well as to provide guidance and oversight in alignment with those expectations. Review of the contract shows that IQS includes clear expectations for academic, financial and operational performance. It should be noted that, according to the narrative and the Cadre Assignments document, and as confirmed by the authorizer interview, there are five cadres assigned to each school, each of which visits the schools three times per year (i.e., fifteen visits per year). During the interview, school leaders articulated that these visits and meetings are supportive and do not infringe on their autonomy.
- The authorizer's practice aligns with policy and it holds schools accountable for student outcomes and compliance rather than processes and inputs. The AAP and school contract indicate that the authorizer is responsible for ensuring that schools meet outcomes related to the performance framework, rather than inputs. For example, it indicates that the ScoreCard will identify the goals of the school in each of five (5) critical performance areas. The Cadre Handbook, Cadre Contract and Fall 2019 Cadre Conference materials detail the responsibilities of the cadre as oversight and guidance (and not as giving directives). The job function slides from the Fall 2019 Cadre Conference shows that cadres are intended to maintain schools' autonomy. The school annual report template discusses the oversight processes and criteria for annual reviews, with emphasis on outcomes. It also includes a space for strengths and opportunities for improvement in relation to the five areas for review. The narrative noted that IQS does not have schools submit data to them, but rather collects the information during school visits or via the school's website.

- The authorizer’s policy aligns with nationally recognized quality authorizing standards. According to NACSA, a quality authorizer: honors and preserves the core autonomies crucial to school success; assumes responsibility not for the success or failure of individual schools, but for holding schools accountable for their performance; minimizes administrative and compliance burdens on schools; and focuses on holding schools accountable for outcomes rather than processes. The IQS School Contract, Section 5, indicates that IQS, in its oversight, focuses on the outcomes in the following areas: mission and program model implementation, governance, student and school performance and finance and operation of the school. The authorizer also holds schools accountable for their performance via ScoreCards, annual reports and the renewal process. Criteria for renewal, including roles and outcomes, are outlined in the contracts and in the yearly ScoreCards. The authorizer uses the ScoreCard as well as the Contract Renewal Evaluation Form for most of their compliance and reporting, which minimizes administrative burdens on the schools but also ensures performance. As previously stated, the authorizer does not ask the schools to submit documents to the authorizer, but gathers them during one of its fifteen school visits and through the school’s website.
- In the Charter School Leadership survey, approximately 86 percent of respondents agreed or strongly agreed that the authorizer preserves the school board’s autonomy. In the interview, the majority of school leaders described the authorizer as being very supportive but not directive. They indicated that the authorizer respects their autonomy as well as their roles and responsibilities. It should be noted that some school leaders did describe instances in which they felt their autonomy was being infringed upon. However, most school leaders identified preserving autonomy as an area of strength for the authorizer.

Key Evidence:

- A.8 Narrative
- AAA/AAP
- Cadre Handbook
- IQS Contracts
- A.8 Alignment with NACSA
- Fall 2019 Cadre Conference
- School Annual Report Template
- ScoreCard
- MAPES Cohort Two Charter School Leadership Survey – Innovative Quality Schools
- Authorizer interview, September 21, 2020
- Charter school leader interview, September 22, 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 2-Satisfactory

Finding: The authorizer self-evaluates its internal ability (capacity, infrastructure and practices) to oversee the portfolio of charter schools.

- The authorizer regularly evaluates its internal ability to oversee the portfolio of charter schools. According to the AAP, self-evaluation is reflected in IQS' value to "transform for educational excellence." The authorizer conducts training three times per year for cadre members and collects feedback, which is used to improve the organization through strategic planning. For example, a review of MLT documents indicates that the board conducts annual evaluations of the management team. Furthermore, annual school surveys and annual cadre surveys (FY 2016 and FY 2020) demonstrate that the authorizer asks for feedback on their authorizing practices. Review of the Management Leadership Report, which IQS submits to its board, discusses improvements to new school applications, responding to late payments from schools, budget fund balance, implementing alternative measures and ScoreCard changes, among other issues and information. The authorizer confirmed in the interview that the board does a yearly evaluation of the MLT, and that the MLT collects annual surveys from cadres and conducts an evaluation during the spring meeting with cadres.
- The annual survey and feedback from cadres, as well as the school leader meeting materials, confirm that IQS conducts self-evaluations that are intentional and planned to build capacity, infrastructure and practices. As noted above, annual budget documents and management leadership reports illustrate that IQS implements feedback from cadres and school leaders to help build the capacity, infrastructure and practices.
- Although the authorizer develops a continuous improvement plan, there is no documented evidence to show that the plan is implemented. In the narrative, the authorizer refers to the strategic planning that its board has conducted. Review of Board Strategic Planning Meeting PowerPoint presentation confirms that the IQS' board engaged in strategic planning, from which they adopted in February 2016 the strategic initiatives included in the budget document. Yet, there is no documented evidence that the authorizer implements these initiatives. While the authorizer's annual budget document states that the board will review its strategic initiatives and adjust them as deemed necessary, there is no documented evidence to confirm that this takes place. While the FY 2017 authorizer annual report includes the strategic initiatives, FY 2018 and FY 2019 annual reports do not include information regarding implementation of the strategic initiatives or progress towards meeting them. Moreover, review of the strategic planning presentations from April 2019 and April 2020 show that the primary focus of these meetings was to evaluate the authorizer's budget (e.g., spending priorities). The topics (e.g., website development, cadres and cadre team leaders, trainings and meetings, research and development) do not align with the strategic initiatives within the FY 2017 annual report and Annual Budget Documents FY 2017 to FY 2021.

Key Evidence:

- A.9 Narrative
- AAA/AAP
- FY 2016 Annual Report – Innovative Quality Schools
- FY 2017 Annual Report – Innovative Quality Schools
- FY 2018 Annual Report – Innovative Quality Schools
- FY 2019 Annual Report – Innovative Quality Schools
- IQS Board Self-Evaluation 2020
- Annual Budget Documents FY17 to FY21
- IQS Additional Documents
- Authorizer interview, September 21, 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 4-Exemplary

Finding: The authorizer consistently disseminates best authorizing practices.

- IQS collaborates with other authorizers to improve the authorizing community. In the narrative, IQS indicates that its staff regularly attends MACSA meetings, which is confirmed by MACSA agendas from 2016 through 2020 and annual reports. Additionally, IQS representatives serve on MACSA's board of directors and executive committee, including a member of the MLT serving as secretary for 2020-2021. 2019-2020 MACSA Officer Executive Committee documents shows that an IQS staff member serves as an Executive Committee Member, and MACSA Minutes from 2016, 2017, 2018 and 2019 demonstrates regular attendance at meetings. MDE documents show that IQS attended the NACSA conference in 2016, 2017 and 2018, and a Superintendents Innovation Group training in 2019. Additionally, they show that an IQS representative attended the NACSA Conference and Boot Camp in 2019. The narrative noted that the authorizer participates in MDE trainings and meetings, which is confirmed by MAPES Peer Review (2020) and meeting sign-in sheets.
- The authorizer regularly shares best practices with or provides technical assistance to other authorizers. According to the narrative, and as a review of emails during the COVID-19 crisis in 2020 confirms, the authorizer created a distance learning plan, which it shared with its schools and other authorizers. Emails from March of 2020 confirm dissemination of the distance-learning plan and an invitation to other authorizers and leaders to a training focused on distance-learning. The plan template includes planning for vulnerable populations such as English language learners and students receiving special education supports. The authorizer also shared best practices in 2020 during remote learning by making a state-required cultural competency training virtual through Google Classroom. A review of screenshots of teachers and leaders accessing the materials, as well as MDE certificates, confirm that the training was completed. Finally, a board training document shows that in July 2019, IQS provided training to other authorizers on accessing data, maintaining privacy, and leading open and closed meetings.
- Best practices and/or technical assistance are sought out by other authorizers. Emails from 2019 and 2020 show that representatives from other authorizers requested specific information from IQS. Specifically, an email from October 2019 shows that an out-of-state authorizer requested information from IQS regarding the multi-measurement initiative (i.e., NGAPS) that IQS is engaged in. An email from July 2020 shows that a Minnesota authorizer asked IQS for examples of its accountability system as it worked to revamp its own processes.

Key Evidence:

- A.10 Narrative
- AAA/AAP
- FY 2016 Annual Report – Innovative Quality Schools
- FY 2017 Annual Report – Innovative Quality Schools
- FY 2018 Annual Report – Innovative Quality Schools
- FY 2019 Annual Report – Innovative Quality Schools
- Google Classroom
- MDE Training – Agendas and sign-in sheets (2016-2019)
- MAPES Peer Review
- NACSA Membership
- NACSA Bootcamp
- NACSA Conference Reflections
- MACSA
- PELSB training
- IQS Additional Documents
- IQS MAPES Additional Evidence
- Authorizer interview, September 21, 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 3-Commendable

Finding: The authorizer regularly complies with reporting, submissions and deadlines set forth in Minnesota Statutes.

- According to MDE, since the start of the review term, the authorizer was at least 97 percent compliant in all the areas stated in the measure origin. IQS was 100 percent compliant in meeting submission deadlines for its authorizer annual report, statements of income and expenditures, new school affidavits, change in authorizer documents and contracts, renewed charter contracts, merger charter contracts and required attendance at MDE trainings. IQS was 92 percent compliant in the submission of supplemental affidavits and 83 percent compliant on the submission of new charter school contracts. According to the MDE compliance spreadsheet, Prodeo Academy did not meet its compliance deadline in 2017 for the supplemental affidavit, the Journey School did not meet the new charter contract execution date in 2016, and Progeny Academy did not meet the new charter contract submission deadline in 2017.

Key Evidence:

- A.11 Narrative
- MAPES Compliance Data Spreadsheet – IQS

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

MAPES Performance Measures A Rating for Innovative Quality Schools is 3.00.

Performance Measures A: Rating Drivers

- The authorizer executes its mission of promoting innovative schools by seeking out schools with innovative practices to authorize, by disseminating innovative practices and models and by highlighting schools within its portfolio during technical assistance.
- IQS has a clear and innovative structure of duties and responsibilities, including the flexible staffing of cadres, which is sufficient to effectively oversee its portfolio of charter schools.
- Resource allocations are commensurate with the budget and are adjusted based on the needs of schools.
- Although the authorizer has a clear conflict of interest policy, it is not consistently implemented and in alignment with the AAP.
- The authorizer regularly disseminates best practices to authorizers and regularly assists other authorizers as IQS staff are members on the MACSA board and the authorizer has increased its efforts during the COVID-19 crisis, providing additional assistance.
- While IQS has strategic initiatives, there are no criteria or timelines associated with them.

Performance Measures A: Recommendations

- Create a strategic plan that includes interim benchmarks as well as criteria and timelines. Using specific data, follow-up on progress regularly.
- Ensure that all authorizer staff refer to and implement every aspect of IQS' conflict of interest policy to ensure that all parties avoid a perceived or actual conflict of interest.

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 3-Commendable

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 regularly align with its stated approval and process standards and promote the growth of high-quality schools.

- The application process is comprehensive and includes clear application questions, fair and transparent procedures and timelines and rigorous criteria. The narrative and AAP describe, and the new school application and website confirm, that the new school application process has four parts: a letter of intent (optional); assignments of cadres and an initial review; a review by the management team, who makes a recommendation to the board; a board review followed by the submission of affidavit to MDE. Board meeting minutes confirm that the board approved or denied new school applications based on recommendations throughout the term of the review. During the interview, the authorizer confirmed the process and indicated that a member of the MLT is assigned as a coach throughout the application process to ensure that all questions are answered. The application also has rigorous criteria and components, as well as clear application questions and guidance. The narrative states, and review of the new school application confirms, that applicants must address innovation, curriculum and instruction, governance, operations and finance. A review of new school applications for Journey School (2016), Progeny Academy (2017), St. Paul School of Northern Lights (2018), Liger Leadership Academy (2018) and RISE Academy (2020) confirms these components, questions and guidance. For example, application reviews are aligned with the authorizer's ScoreCard, which has criteria for the five key areas listed above and show consistency of process in the scoring amongst reviewers, recommendations to the board and general comments. The timeline for the application is also clear, and is confirmed on the authorizer's website.
- The authorizer's decisions and resulting actions are consistent across the portfolio. In the narrative, the authorizer states that it consistently uses a rubric to evaluate new school applications, and review of completed ScoreCards for new school applications (listed above) confirm this. Board meeting minutes demonstrate that the authorizer's management team presented substantial information to the board in alignment with the authorizer's criteria. Finally, the Summary of New School Applications indicates whether the authorizer approved each applicant over the period of 2016 through 2020, and gives reasons why an application may have been denied, such as finances.

- The authorizer's decisions and resulting actions consistently align with its AAP. The AAP describes the aforementioned process for the review of new school applications. It further indicates that the application must align with Minnesota statute and contain all the required components such as vision/mission, performance components, financial plan, governance plan, innovative aspects, description of instructional model, alignment with state standards, plans for special populations, operations plan, facilities plan, plan for hiring staff and professional development and plans for marketing and outreach. A review of ScoreCards contained within new school applications between 2016 and 2020 confirms the inclusion of these components. Additionally, the Summary of New School Applications lists the outcome of every application over the review term, and reasons for denial. Board meeting minutes from March 2017 and 2020 include evidence of the decision-making process. The AAP states that the website asks for requests for proposals, and that the authorizer seeks out applications via community events, and at MACSA and other sites. It also states that the board will consider the number of schools in the portfolio, consider a variety of options for authorizing, and consider a variety of models, which the authorizer reaffirmed during the interview.
- The authorizer's new charter school application and decision process are aligned with nationally recognized quality authorizing standards. IQS' new school application process aligns with NACSA Quality Standard #2: Application Process and Decision-Making. As described above, IQS states its chartering priorities and has a comprehensive application process that includes clear questions and guidance and rigorous criteria, this is confirmed by a review of the new school applications for Journey School (2016), Progeny Academy (2017), St. Paul School of Northern Lights (2018), Liger Leadership Academy (2018), and RISE Academy (2020). It also provides clear guidance and requirements regarding the application content and format while also explaining evaluation criteria. NACSA indicates that quality authorizers consider diverse educational philosophies, approaches, and school models. On the website, IQS states that it welcomes all kinds of applicants and models.
- The application and decision process is rigorous and intentional and reflects a strategy to promote high-quality charter schools. The application itself must include names of school founders, the mission statement, the school purpose, a program design, a financial plan, and the governance and management structure. Additionally, the application must describe the need for the school and include an executive summary, accountability goals, strategies for special populations, recruitment strategies, calendar and schedule. The review process includes three reviewers as well as approval from the Board, and all reviewers must adhere to strict criteria within the new school application rubric. Board meeting minutes from March 2017 and March 2020 demonstrate that the Board reviews the viability of each proposed school, as well as the planning process for designing its program. The minutes also reveal that discussions take place around whether the proposed school could be high-quality.
- Level 2 indicators were met for the authorizer's term to date. The processes and practices previously described have been in place since January 2016 and have been consistently utilized by the authorizer over the term of the review. It should be noted that the authorizer submitted an initial new school affidavit for Great Plains School of Technology and Information and a review of the new school affidavit rubric shows that MDE requested clarification regarding IQS' review and approval process. According to the authorizer's review and comment submission form, the school withdrew its application; therefore IQS never submitted revised documentation to MDE. Thus, the initial affidavit is still on record with the department as being out of alignment with IQS' AAP.
- The authorizer's decisions have not consistently resulted in high-quality schools. Review of MDE's identified high-quality schools between FY 2016 and FY 2020 show only four out the 30 IQS schools have been rated as high-quality. None of these four schools maintained their rating consistently. Additionally, review of annual reports for FY 2016 through FY 2020 reveal inconsistent performance, with some schools in the portfolio scoring above the statewide average and some scoring below.

Key Evidence:

- B.1 Narrative
- AAA/AAP
- FY 2016 Annual Report – Innovative Quality Schools
- FY 2017 Annual Report – Innovative Quality Schools
- FY 2018 Annual Report – Innovative Quality Schools
- FY 2019 Annual Report – Innovative Quality Schools
- Innovative Quality Schools Website
- IQS New School Application
- March 2017 Board Meeting
- March 2020 IQS Board Meeting
- Liger Leadership Academy and Progeny
- St. Paul School of Northern Lights Application
- Summary of New School Applications
- 18.07-11 GPSTI New School Affidavit Rubric-INITIAL
- B.1 Alignment with NACSA Standards
- IQS Additional Documents
- Authorizer interview, September 21, 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 1-Approaching Satisfactory

Finding: While the authorizer has clear and comprehensive approval criteria and standards to rigorously evaluate proposals of existing charter school expansion requests and other interim changes, its resulting actions regarding charter school expansion and other interim changes are not consistent across its portfolio of charter schools.

- The authorizer’s application processes for expansion and changes are comprehensive and include clear application questions and guidance and rigorous criteria, and transparent procedures and timelines. The AAP describes in detail the process for site/grade level school expansion, including: evidence of need for expansion, a longitudinal record of demonstrated student academic performance and growth; a history of sound school financial sustainability; and board capacity and an administrative and management plan to implement the expansion. The site visit expansion application is comprehensive, requiring applicants to complete four parts (e.g., executive summary, school foundation and learning program, financial performance, board capacity). The application includes a rubric with four rating levels, ranging from “does not meet expectations” to “exceeds expectations.” The application notes that a school applicant must meet a cumulative average of at least 80 percent of points to be recommended for consideration by the IQS board. The AAP also includes information regarding a change of authorizer or transfer request. A process document included in the AAP provides a detailed explanation of the steps needed to apply for a change of authorizer. The authorizer has rigorous criteria for both processes, as seen in the application rubrics and as confirmed by reviews of the BlueSky expansion application and the City Academy CIA transfer application. All applicants must complete a Ready to Open checklist, and the same checklist is consistently used for both transfer and expansion applicants. The AAP describes processes and standards for transfer and expansion, and the website contains detailed applications, processes, timelines and criteria for both transfer and expansion. It should be noted that IQS revised its applications in 2019.

- The authorizer’s decisions and resulting actions are not consistent across the portfolio of charter schools. The Accountability Decisions document charts all decisions made for expansions, transfers and early learning throughout the term. For example, a review of BlueSky Expansion Affidavit document shows that the authorizer requested a description of need, progress on performance, financial information, and governance and management performance. It also includes the review from two cadre members and the management team and a recommendation. The BlueSky Expansion Application Review shows that the authorizer reviewed the application against a rubric to score it as well as draft the recommendation. Yet, as mentioned previously, a letter from MDE to IQS dated December 31, 2018 explains that after a review of seven supplemental affidavits, MDE noted areas of concern and deficiency, particularly regarding a lack of evidence demonstrating alignment with statutory requirements, MDE guidance, and IQS’ AAP. According to the letter, and verified by a review of the supplemental affidavits, the authorizer revised and resubmitted the seven affidavits. Yet, according to MDE, IQS “failed to demonstrate, in the form and manner requested by the commissioner, that IQS had reviewed the affidavits consistent with the review process outlined in the IQS AAP.” While a review of transfer applications and MDE review rubrics for Minisinaakwaang Leadership Academy (2017), St. Paul City School (2017), City Academy (2019) show that the authorizer uses a consistent process for transfer schools, there no documented evidence to confirm whether IQS’s decisions are consistent for schools transferring into the portfolio. Further, the City Academy IQS Board Action documents lists five Ready to Open Checklists that were reviewed, four of which were approved by the board in July of 2019; however, there is no other documentation to confirm that the authorizer used these checklists across its portfolio.
- The authorizer’s decisions and resulting actions align with its AAP. A review of the narrative confirms the same process and criteria for expansions, transfers and other changes as is included in the AAP. For example, the BlueSky Grade Expansion Application and the City Academy CIA document describe the cadre process and require schools to show how they are innovative, performance history, enrollment, finances, board capacity, alignment to IQS, and show the process described in the AAP. The AAP also states that IQS will utilize a comprehensive checklist to determine whether or not a school is ready to open. The City Academy IQS Board Action documents lists five Ready to Open Checklists that were reviewed, four of which were approved by the board in July of 2019, showing alignment with AAP.

Key Evidence:

- B.2 Narrative
- AAA/AAP
- FY 2016 Annual Report – Innovative Quality Schools
- FY 2017 Annual Report – Innovative Quality Schools
- FY 2018 Annual Report – Innovative Quality Schools
- FY 2019 Annual Report – Innovative Quality Schools
- B.2.2 Site Expansion
- B.2.3 Pre-K School Expansion
- B.2.4 Transfer-Process
- BlueSky Expansion Affidavit
- BlueSky Expansion Application Review
- BlueSky Grade Expansion Application
- City Academy CIA
- Ready to Open Checklist
- City Academy IQS Board Action
- Interim Accountability Decisions
- IQS website
- IQS MAPES Additional Evidence
- IQS Additional Documents
- Authorizer interview, September 21, 2020
- Charter school leader interview, September 22, 2020

B.3 Measure: Contract Term, Negotiation and Execution

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

Performance Level Rating: Level 1-Approaching Satisfactory

Finding: The authorizer executes contracts that clearly define material terms and rights and responsibilities of the school and the authorizer; however, not all executed contracts are in compliance with state statute.

- The majority of contracts in the authorizer’s portfolio of charter schools meet current statutory requirements. Review of the IQS Contract template demonstrates that more than half of IQS’ contracts meet statutory requirements. This includes a declaration of the additional purpose(s) that the school intends to carry out and a statement of admission policies and procedures. The MDE Compliance Spreadsheet shows that all of the authorizer’s new school contracts met statutory requirements. The IQS contract contains a total of eight addenda to support the body of the contract language and to ensure compliance with all aspects of the law. The AAP dictates the timeline for contract drafting/negotiations (45 days) and approval (20 days), as well as charter board approval (10 days). The revised IQS contract shows that IQS implemented revisions in 2019, as requested by MDE. Yet, eight of the authorizer’s 28 renewal contracts submitted over the term of the review remain out of statutory compliance, including those for Cyber Village Academy (2017), Jane Goodall Environmental Sciences Academy (2020), Level Up Academy (2020), Minisinaakwaang Leadership Academy (2017 and 2018), Minnesota Excellence in Learning Academy (2020) and Success Academy (2020). It should be noted that as of December 7, 2020, a revised contract for Prodeo Academy, which was formerly out of compliance, was under review by MDE and two new school contracts (Kalon Academy and Kandiyohi Academy) were still under review by MDE.
- Contracts state the rights and responsibilities of both the school and the authorizer. A review of contracts shows that they state the rights and responsibilities of the school and authorizer. For example, the contract states in section 5.1 that the authorizer’s role is for oversight of the five areas (mission, finance, school performance, governance and management). Section 5.2 outlines additional duties of the authorizer such as sharing best practices and facilitating collaboration between schools. The school’s role includes governance (4.1), management and administration (4.2), finance (4.3), performance and enrollment (4.7) and reporting (4.8). Addendum 5 includes assurances and Addendum 6 is the renewal evaluation form. A review of IQS contracts with Success Academy (2020) and BlueSky Expansion Contract Amendment (originally agreed to in 2017), shows the inclusion of clause 8.3, which outlines the rights of the school and authorizer. Specifically, it indicates that, except as otherwise provided by the agreement or applicable law, IQS has no authority, control, power or administrative or financial responsibility over the school. In the school leader interview, participants confirmed that the contract stated the rights and responsibilities of the school and authorizer.
- A review of the authorizer’s contracting practices shows that they are consistent across the portfolio. For example, the City Academy Contract from 2020 includes the rights and responsibilities of the school and the authorizer as described above. The IQS contract with Modern Montessori dated October 2018 includes all of the same statute alignments and roles and responsibilities, as well as all the sections outlined in the AAP. The IQS contract with Success Academy from July 2020 includes role and responsibilities, shows compliance with Minnesota statute, and also aligns with all required sections in the AAP. In the school leader interview, participants confirmed that the contracting practices are consistent.

- According to MDE’s compliance spreadsheet, all IQS contracts were executed no later than the first day of the renewal period.
- Level 2 indicators were not met for at least three years. As noted above, according to MDE (as of the submission of the MAPES report on December 7, 2020), the authorizer had non-compliant contracts for 2017, 2018, 2019, and 2020. It should be noted that, in its authorizer review and comment submission form, the authorizer stated that it has been in full compliance with Minnesota statute throughout the term and that MDE, with its internal staffing changes, has shifted its expectations over time. IQS noted that it made changes to its contract form in March 2019 and that subsequent contract for FY 2020 and FY 2021 have utilized this new template. IQS writes that, “In spite of the agreed upon changed in language, the MDE continues to identify changes in contract language that give the appearance that IQS contracts, and contract renewal processes, are out of compliance with the Minnesota statute. They are not.”

Key Evidence:

- B.3 Narrative
- AAA/AAP
- IQS Contract
- City Academy CIA
- City Academy CIA Request
- City Academy Contract
- City Academy IQS Board Action
- IQS Contract With Modern Montessori
- IQS Contract with Success Academy
- BlueSky Expansion Contract Amendment
- Revised IQS School Contract
- MAPES Compliance Data Spreadsheet - IQS
- IQS Additional Documents
- Authorizer interview, September 21, 2020
- Charter school leader interview, September 22, 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 1-Approaching Satisfactory

Finding: The authorizer does not consistently execute contracts with clear, measurable and attainable performance standards.

- Contracts in the authorizer’s portfolio of charter schools do not meet current statutory performance standards. A review of MDE’s Renewal Contract Compliance Reviews indicates that IQS’ contracts do not consistently meet Minnesota Statutes, section 124E.10, subdivision 1(a)(3) by including a description of the school program and the specific academic and nonacademic outcomes that pupils must achieve. For example, MDE’s renewal contract compliance reviews for St. Paul City School, Jane Goodall Environmental Sciences Academy and Success Academy note that “the IQS ScoreCard...does not indicate the clear, specific and measurable target performance goals that [the school] will be expected to achieve.” It should be noted that, in its factual response, IQS refers to MDE’s “inconsistency and ever-changing criteria in their own review process.” Yet, contract compliance rubrics for Minisinaakwaang Leadership Academy (2018 and 2020) both include feedback that the contract does not provide a measurable target and goals are not specific. Additionally, feedback in these review rubrics as well as those for Prodeo Academy (2019) and Technical Academies of Minnesota (2020) include feedback that the authorizer should include the School Improvement Plan within the contract to ensure transparency.
- While the authorizer’s performance standards are consistent, performance outcomes are inconsistent across the authorizer’s portfolio of charter schools. A review of contracts shows that performance standards (i.e., generalized standards across the portfolio) are contained in the ScoreCard, but that performance outcomes (e.g., specific student academic and non-academic outcomes that pupils must achieve as well as outcomes which are indicative of school performance) are set with each school outside of the contract. For example, not all schools have specific metrics for section 3b of the ScoreCard (MCA Proficiency Comparison Groups). According to the MDE Compliance Contract Review Rubric for Venture Academy, the contract does not indicate the clear, specific and measurable target performance goals (or outcomes) that the school will be expected to achieve. Additionally, a review of the authorizer’s contracts with its schools and MDE Contract Compliance Review Rubrics demonstrates that school-specific goals are not set forth and data is not identified and agreed upon by both parties at contract signing in a way that is consistent across the portfolio. Measurable school-specific student outcomes are also not consistently included in the ScoreCard within the contract. When asked about performance measures during the interview, school leaders explained that they were not able to set performance outcomes at the time of contracting without an awareness of who the students are that they will serve.
- Contracts align with the performance standards of IQS’ AAP. The AAP states that each contract contains performance standards as required by Minnesota Statute 124E.10. IQS’ contracts all include the ScoreCard, which the authorizer uses to monitor annual progress. The ScoreCard measures performance in five areas, including innovation, curriculum and instruction, governance, operations and finance. The AAP also states that school-specific benchmarks are set during the contracting process, with the exception of those required by MDE which are consistent across the portfolio of schools.

Key Evidence:

- B.4 Narrative
- AAA/AAP
- IQS Contracts
- 16.11-04 IQS - Beacon Academy Renewal Contract Rubric -FINAL
- 17.08-30 IQS -Progeny NEW School Contract Review Rubric -FINAL
- 18.03-06 IQS-DPSA Renewal Contract Review Rubric-REVISED
- 19.03-21 IQS-Modern Montessori New Contract Compliance Review Rubric
- 20.05-27 IQS-City Academy CIA Contract Compliance Review Rubric
- 20.05-28 IQS-Venture Renewal Contract Compliance Review Rubric
- 20.09-04 IQS-JGESA Renewal Contract Compliance Review Rubric
- 20.09-04 IQS-SPCS Renewal Contract Compliance Review Rubric
- 20.09-04 IQS-Success Renewal Contract Compliance Review Rubric
- Level Up Academy Contract Renewal
- IQS Additional Documents
- Authorizer interview, September 21, 2020
- Charter school leader interview, September 22, 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 regularly 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.

- The authorizer has clear processes for oversight and monitoring. The narrative explains that each member of the cadre focuses their oversight on a particular area of expertise (e.g., mission, student performance, finance, operations, governance). A review of cadre assignments shows that each school has five cadres assigned to it, who are aligned with each of the key areas. Additionally, Section 5 of the IQS contracts with schools indicates that IQS will implement a plan to provide oversight, including the extent of the effectiveness of the school's mission and program model implementation, governance, student and school performance, finances and operations. The narrative also discusses the process for oversight by each cadre, including at least three different visits per year in a variety of formats, a mid-year report and an annual report. A review of cadre reports shows that all visits and reports are aligned with the ScoreCard and, as such, each of the key five areas. Furthermore, the Cadre Handbook indicates that cadres must complete at least three observations annually for each category and submit a written report following each, and these observations are used to complete the mid-year and annual reports. The contract notes that all schools are required to create a school improvement plan, and this, along with the mid-year and annual reports, forms the basis for feedback, which is given through observations. An observation can take many forms, such as on-site visits, virtual visits, or online reviews.
- The authorizer conducts charter oversight that competently evaluates academic, financial and operational performance and monitors compliance with applicable law. In the narrative, the authorizer states that cadres conduct observations multiple times per year in the following categories: school vision, mission and program; school governance; school/student performance; school finance; school operations. A review of reports confirmed that, for each category, the cadre includes observed areas of positive performance and areas of opportunities to improve. All observations and mid-year and annual reports are aligned with the authorizer's ScoreCard (included as part of the contract), which evaluates academic, financial, governance and operational performance and compliance. Schools are also required to complete a school improvement plan aligned with the ScoreCard. A review of mid-year reports, cadre observations, annual reports and school improvement plans confirmed that these take place. A review of mid-year reports shows that they include a year-to-date summary of observations in the following categories: school vision, mission and program; school governance; school/student performance; school finance; school operations. Each category includes observed areas of positive performance and areas of opportunities to improve. Review of Duluth FY20 School Improvement Plan (academic), Echo FY19 Mid-year Report (academic, financial, operations), Level UP Academy Contract Renewal (2020 – academic, financial, operations) and Technical Academies of Minnesota FY18 School Improvement Plan (September 22, 2017 – academic, financial, operations) demonstrate the authorizer's oversight of academic, financial and operational performance. In the charter school leader interview, participants confirmed the oversight practices, describing cadre visits, mid-year reports, annual reports and school improvement plans.

- The authorizer’s focus on the aforementioned areas of oversight included in the ScoreCard align with the AAP, which lists the areas as the school’s mission and program model implementation, governance, student and school performance, finances and operations. The AAP states that cadres will provide oversight of each category of the ScoreCard through site visits, interviews and an online examination of performance metrics. Cadre assignments, the Cadre Handbook and fall training agenda show that the authorizer assigns cadres based on area of expertise, and that they are trained in the ScoreCard and oversight duties. The annual reports, mid-year reports and cadre visits also summarize these visits.
- The authorizer’s oversight and monitoring practices are consistent across the portfolio. All site visits, observations, reports and renewal processes are aligned with the ScoreCard. According to the Cadre Handbook and fall training agenda, cadres are trained each year on the ScoreCard and oversight duties. According to the narrative, each school is required to create annual school improvement plans based on the mid-year and annual report, and every school uses the authorizer’s Renewal Evaluation form, which is an addendum to the contract, as part of the renewal process. A review of cadre observations, mid-year reports and annual reports confirms that practices are consistent across the portfolio of schools. During the charter school leader interview, participants confirmed the oversight practices, describing cadre visits, mid-year reports, annual reports and school improvement plans. School leaders also stated that each year cadres follow-up with schools using the data.
- The authorizer’s oversight process aligns with nationally recognized quality authorizing standards. In alignment with NACSA Quality Standard #4: Ongoing Oversight and Evaluation, the authorizer implements a comprehensive performance accountability and compliance monitoring system (e.g., site visits, mid-year reports, annual reports, school intervention plans) that is defined within the charter contract and aligned with the authorizer’s ScoreCard.
- The authorizer’s processes for ongoing oversight reflect a strategy to promote high-quality charter schools. The ScoreCard, to which contracts, oversight, reporting, renewals and interventions are aligned, is rigorous and aligned with the five key areas of oversight (academics/school performance, mission/vision, governance, operations and finance).
- Level 2 indicators were met for the authorizer’s term to date. The monitoring and oversight processes and practices previously described have been in place since January 2016 and have been consistently implemented by the authorizer over the term of the review.
- Although the majority of school leaders confirmed the oversight practices, describing cadre visits, mid-year reports, annual reports and school improvement plans, the authorizer practices have resulted in only five high-quality schools (18 percent of operational schools within its portfolio) over the term as identified by MDE. These include Beacon Academy (2016, 2017), Cyber Village Academy (2017), International Spanish Language Academy (2016, 2017, 2018), Nasha Shkola (2018), and STEP Academy (2016, 2017, 2018, 2019, 2020).

Key Evidence:

- B.5 Narrative
- AAA/AAP
- Duluth FY20 School Improvement Plan
- Echo FY19 Mid-year Report
- Level UP Academy Contract Renewal
- TAM FY18 School Improvement Plan
- Cadre Handbook
- Fall Training Agenda
- Fall School Leader Meeting
- IQS School Contract
- ScoreCard
- B.5 Alignment with NACSA
- 2016 High-Quality School List – Final
- 2017 High-Quality School List – Final
- 2018 High-Quality School List – Final
- 2019 High-Quality School List – Final
- 2020 Initial Eligibility List for Charter School Expansion - Final
- IQS Additional Documents
- MAPES Cohort Two Charter School Leadership Survey – Innovative Quality Schools
- Authorizer interview, September 21, 2020
- Charter school leader interview, September 22, 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, intervention and corrective action.

- The authorizer has clear and comprehensive standards and processes to address complaints, intervention and corrective action. The AAP outlines IQS' complaint process, indicating two areas: 1) student/parent conflict with the school; and 2) alleged violations of Minnesota Statute. The AAP states that to address student/parent complaints, the authorizer maintains contact phone numbers on its website for members of its MLT, who are to serve as mediators between the school and the complainants. Although the narrative details the process for complaints—listen, investigate, contact people involved, collect data, write a report and forward a letter of deficiency to the school if appropriate—there was no additional documentation to confirm this. In the event of an alleged violation of state statute, the AAP states, "IQS will become directly involved and conduct a thorough review of all facts related to the incident. If the school has been in violation of the rule of law, IQS will then initiate its range of interventions." The AAP, as well as Addendum 7 of the IQS contract, describe the range of interventions, including: letter of commendation; letter of concern; letter of deficiency; notice of probationary status; notice of unscheduled charter review; notice of scheduled charter contract renewal review; and, specific performance evaluation to be conducted for contract renewal purposes. The authorizer's ScoreCard addresses complaints and tracks them each year in the observations/visits, and mid-year and annual reports. They are also included within the renewal evaluation form. A review of school improvement plans confirms that all schools are required to complete a plan, based upon annual reports, which include areas of strength and growth, and conversations with cadres. It should be noted that MDE data provided multiple examples, including complaints filed for Minnisinaakwaang Leadership Academy, STEP Academy, Prodeo Academy and Cyber Village Academy, where IQS did not follow up with a response to the department or provide requested information to MDE regarding specific complaints.

- The authorizer’s decisions and resulting actions are consistent and align with the AAP. In the AAP, the authorizer states that it views parent complaints as the responsibility of the school and will act to serve as a mediator, but will become directly involved if the complaint involves a violation of statute, in which case it will immediately begin its intervention process. If complaints trigger an intervention, the complaint is documented so as to be reviewed during the renewal process. As examples, in 2018, IQS sent a letter of intervention to Level Up in May 2019 for not notifying IQS of a potential change to the school’s by-laws, and it sent a letter of concern to STEP Academy (following a letter from MDE to the authorizer) noting concerns around employment termination. In this notice, the authorizer asked for “a full and complete response” to the questions included in the notice. This process is aligned with the AAP. Additionally, in the four example complaint documents, including a complaint submitted by a family, a complaint submitted to MDE, and two inter-school complaints, the authorizer uses data, reminds the school of policy, and asks for a response and/or action steps. The documents show that complaints were handled consistently, using the process detailed in Addendum 7 (Range of Interventions) and in the contract. Finally, they show that the authorizer used a consistent process across schools in alignment with its AAP. IQS MAPES Additional Evidence also shows that the authorizer used a consistent process across schools in alignment with its AAP to address and resolve complaints for Success Academy and Technical Academies of Minnesota. Finally, a review of complaints for Minisinaakwaang Leadership Academy revealed that MDE received a complaint on December 3, 2017 regarding concerns about special education programming. MDE notified IQS, then conducted a special education audit, and uncovered a violation of statute in 2018. IQS MAPES Additional Evidence document show that this complaint for Minisinaakwaang Leadership Academy was resolved, and also show that there is a consistent process in place to address complaints, interventions and corrective action for Success Academy and Technical Academies of Minnesota.
- Decisions made regarding complaints, intervention and corrective action are aligned with data generated under oversight and monitoring practices. All schools are required to create an annual school improvement plan, which is based on the annual report written by the cadre, which centers around the ScoreCard. For example, in the IQS Additional Documents, the SIP for Technical Academies of Minnesota is aligned to its annual report. The interventions and related actions taken by IQS involve further data/evidence gathering by IQS. For example, the Annual Report 2016 document details a situation where the school had an issue regarding school operations, reporting, and instructor licensing requirements, and so the authorizer issued a Letter of Deficiency on June 9, 2016. The school’s response was to develop a School Improvement Plan for the coming year to ameliorate the stated deficiencies. The documentation of complaints in the Family Complaint, Inter-School complaint and the MDE complaint all show that the first step was to gather more data, whether it was conversations with more people, school improvement plans or ScoreCards.

- IQS standards and processes align with NACSA standards. For example, the IQS Contract states the conditions that may trigger intervention. The B.6 Alignment with NACSA document details these standards and processes. For example, the authorizer establishes and makes known to schools the intervention policies. Interventions are listed in the contract in Addendum 7 and in Section 8. Additionally, complaints are addressed via mid-year and annual reports. Cadres and the MLT use their professional discretion before they go to the intervention steps. The authorizer also gives schools clear, adequate, evidence-based, and timely notice of contract violations or performance deficiencies. One of the first steps in an intervention is a Letter of Deficiency that contains a minimum timeline of ten days. The list of interventions in Addendum 7 of the IQS School Contract preserve autonomy and responsibility, and there are three levels of interventions which range from letters of concern to placing the school on probation. For example, as outlined in the B.6 Alignment with NACSA document, IQS has made available through its grant program funds to its schools to acquire the services of a professional outside facilitator to assist in remedying a situation. The interview with the authorizer confirms this process as well as obtaining legal counsel when necessary.
- During the interview, most school representatives confirmed that the authorizer has clear and comprehensive standards and processes to address complaints, intervention and corrective action. For example, some participants described going through a complaint shared by MDE line by line with IQS and discussing the steps that needed to be taken to resolve the complaint. They described how the authorizer helped them resolve another difficult complaint. The majority of school leaders agreed with these examples. Additionally, some participants referred to intervention, describing corrective action in the form of a school improvement plan.

Key Evidence:

- B.6 Narrative
- AAA/AAP
- IQS School Contract
- ScoreCard
- Letter of Intervention
- Family Complaint
- Inter-School Complaint
- B.6 Alignment with NACSA document details these standards and processes
- 17.12-08 Re Minisinaakwaang Leadership Academy Complaints
- 18.03-12 Re Complaint Status Update
- 18.04-26 Dan Mott regarding Minisinaakwaang
- 18.05-31 Re Complaint Status Update -STEP and MLA
- 19.11-26 TAM Letter of Deficiency and Probationary Status Nov 2019
- 19.09-25 IQS Success Complaint Response Sept. 12, 2019
- 19.09-12 MDE Letter to IQS re Success Academy Complaint
- 20.05-22 STEP Academy Probationary Status
- IQS Additional Documents
- IQS MAPES Additional Evidence
- MAPES Cohort Two Charter School Leadership Survey – Innovative Quality Schools
- Authorizer interview, September 21, 2020
- Charter school Leader interview, September 22, 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 support and technical assistance the authorizer provides is proactive. Review of school leader conference presentations from May 2016, August 2016, May 2017, August 2017, spring and fall 2018 (no dates provided), May 2019 and August 2019 confirms that IQS holds regular, semi-annual conferences for the schools within its portfolio to provide technical assistance. For example, topics at the meetings have ranged from the IQS ScoreCard, Every Student Succeeds Act (ESSA), open meeting law and the operations of governing boards, improving school performance and alternative measures of student and school success. In addition to the fall and spring conferences, presentation documents for 2017, 2018 and 2019 show that IQS also hosts School Leaders' Workshops in November of each year. For example, in November 2017, the agenda included: annual report to the IQS board; new initiatives; and school-board best practices. Additionally, IQS invited schools to participate in the Groves Literacy Partnership, a partnership between a private school for children with learning disabilities and schools within its portfolio that focus on teaching phonics at an early age.
- The authorizer provides support and technical assistance in a variety of areas. As described in a summary of professional development opportunities and as noted above, the authorizer provides assistance in areas such as: school board training, ESSA, alternative measures and distance-learning best practices. In addition, the Groves Literacy Partnership document shows that IQS partnered with a private school to provide technical assistance related to literacy, and the NGAPS Year 1 Summary document also shows that IQS provided support related to implementing alternative assessments. A Google Drive screenshot shows that IQS offers support around cultural competency, and a distance-learning template shows support for remote learning during COVID-19. Furthermore, emails from March 2020 confirm dissemination of the distance-learning materials and invitations for school leaders to a distance-learning training. Annual reports show that the authorizer provided technical support in areas such as: alternative assessments (2017, 2018, 2019), school law and finance (2017, 2018) the ScoreCard (2017), the School Improvement Process (2017) and the sharing of best practices (2017). In the interview, school leaders confirmed being offered and attending cultural competency training, receiving distance-learning resources, attending board member trainings and learning about the Next Generation Assessment Portfolio System.

- Support and technical assistance preserve school autonomy. According to the narrative and the AAP, all technical assistance is voluntary and not required. The NGAPS Year 1 Summary document shows that six schools participated in the alternative assessment summary and the authorizer indicated that five schools participated in the Groves Literacy Partnership. In the interview, a majority of school leaders confirmed that technical assistance and support is offered regularly by the authorizer, but it is not required. There is no documented evidence that school leaders and board members are required to attend the trainings provided by IQS, thus preserving school autonomy.
- Support and technical assistance are provided in a manner that is consistent across the portfolio of charter schools. During the charter school leader interview, participants reported that technical assistance is offered to all schools. As noted above, the cadre assignments show how schools are thoughtfully assigned cadres according to cadres' areas of expertise and the school's need. Additionally, a cadre may provide special assistance to the school if asked. Annual reports (FY 2016-FY 2019) confirm that technical assistance is offered to all school leaders. For example, all schools are invited to participate in semi-annual school leader meetings.
- Support and technical assistance are regularly offered, based on need, and they are designed to prevent problems. As stated in the interview, and as confirmed by a review of the surveys, the authorizer uses the annual cadre survey data, as well as the annual school survey feedback, to plan technical assistance. A review of the summary of professional development opportunities documents indicates that the authorizer also offers several opportunities annually for schools to share best practices and receive technical support on various topics. The school leader training presentation materials confirm that IQS holds two to three meetings each year with school leaders on topics such as NGAPS, school board training, finances and reports to the authorizers. Because cadres align their reports and visits with the ScoreCard, and each year schools are required to create a school improvement plan, cadres offer technical assistance to schools based on their specific needs. During 2020, the authorizer shared a distance-learning template and training, as well as a way to share best practices through Google Drive, all based on demonstrated need.
- Support and technical assistance are designed to promote high-quality charter schools. The NGAPS Year 1 Summary, the Groves Literacy Partnership, and the Innovative Grant Application Guidelines all are evidence that technical assistance is aligned with improving student outcomes and increasing all student performance. Assessment data from the Groves Literacy Partnership shows increasing student achievement in grades 1-3 for IQS schools who participated in the program, especially high-risk students. In the school leader training materials, there are multiple instances of sharing best practices, showcasing innovations at schools, and other trainings to promote high-quality schools, such as board governance and finance training. In the Charter School Leadership survey, 75 percent of respondents stated that yes, the authorizer provides technical assistance to their school, and 71 percent of respondents agreed or strongly agreed that the authorizer provided quality technical assistance.

Key Evidence:

- B.7 Narrative
- AAA/AAP
- FY 2016 Annual Report – Innovative Quality Schools
- FY 2017 Annual Report – Innovative Quality Schools
- FY 2018 Annual Report – Innovative Quality Schools
- FY 2019 Annual Report – Innovative Quality Schools
- Groves Literacy Partnership
- Cadre Bios
- Summary of Professional Development Opportunities
- Distance Learning Template
- Board Training
- Cadre on Special Assignment
- Cadre Assignments
- GoogleDrive
- PELSB Training
- IQS Additional Documents
- MAPES Cohort Two Charter School Leadership Survey – Innovative Quality Schools
- Authorizer interview, September 21, 2020
- Charter school leader interview, September 22, 2020

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

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

Performance Level Rating: Level 4-Exemplary

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

- The authorizer has an intentional plan for successful model replication and dissemination of best practices; and models and practices have been identified. According to the AAP, IQS seeks to promote model replication of schools currently focused on instructional innovations including: project-based learning; school-wide application of the multi-tiered system of supports (MTSS) of instruction; experiential learning, and language immersion. The AAP also indicates that IQS seeks to include operational innovations including teacher-led schools and models that employ multi-site school governance. IQS' plan in the AAP for model replication further describes: establishing an electronic network to be able to share best practices; identifying multiple measures of school success, and including new innovations within the school improvement plans. Dissemination of best practices is planned through annually spotlighting schools, school conferences and an annual report. The IQS Strategic Plan includes intentional model replication and dissemination and review of the annual budget documents confirms that budget allocations are aligned with the authorizer's strategic initiatives. The narrative states that the authorizer has given over ten innovation grants to schools to explore new innovative practice, and review of the IQS Innovation Grant Recipients document shows that it provided grants for topics such as leadership, the Groves Literacy Partnership, and social-emotional learning. Finally, during the interview, the authorizer explained (and review of the documents and screenshots confirmed) that IQS spotlights schools and creates opportunities for schools to share best practices, including through the set-up of the Google Drive as an electronic network, through school improvement plans and through school leader training materials.
- The authorizer has at least two models or practices that are moving towards replication or dissemination. As stated above, the NGAPS program is now being implemented at six schools and five IQS schools are involved with the Groves Literacy Partnership, as confirmed by the award letters. For example, according to an article in the MinnPost from November 2018, first-graders at Prodeo Academy made significant gains after adopting some of the literacy practices learned through the Groves Literacy Partnership. The Google Classroom document shows that IQS disseminated the cultural competency training to all schools, and screenshots confirm that teachers and school leaders accessed the files. Several certificates from MDE show that teachers and school leaders have completed the training.
- One or more identified models/practices have been disseminated to one or more schools beyond the original. The Groves Literacy Partnership has been shared at five schools and the NGAPS alternative measures has been shared at six schools, as confirmed by award letters and attendance at training documents. According to IQS, Prodeo Academy was the first school to participate in the Groves Literacy Partnership, but they have since been joined by St. Paul City School in 2018, Minnesota Excellence in Learning Academy in 2019 and Success Academy and The Journey School, currently in their first year.

Key Evidence:

- B.8 Narrative
- AAA/AAP
- IQS Strategic Plan
- Grove Literacy Partnership
- NGAPS Year 1 Summary
- Annual Budget Documents FY17 to FY21
- Distance Learning Plan Template
- Google Classroom
- IQS Additional Documents
- MAPES Cohort Two Charter School Leadership Survey – Innovative Quality Schools
- Authorizer interview, September 21, 2020
- Charter school leader interview, September 22, 2020

B.9 Measure: Charter School Renewal and Termination Decisions

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

Performance Level Rating: Level 3-Commendable

Finding: The authorizer regularly uses clear and comprehensive standards and processes to make high-stakes renewal and termination decisions. The authorizer’s renewal and termination decisions are aligned with its stated renewal standards and processes and promote the growth of high-quality charter schools.

- The authorizer has transparent and rigorous standards and processes designed to use comprehensive academic, financial, operational and student performance data to make merit-based renewal decisions and terminate charters when necessary. IQS’ school contract contains provision 5.3 that clearly defines the required school performance to justify renewal. Section 6.1 of the Contract delineates the grounds for non-renewal and termination. IQS’ AAP describes scoring on the ScoreCard and the Renewal Evaluation form. The Scorecard, which is included as an addendum to the contract and used for all observations, visits, reports and school improvement plans, details performance expectations of schools for mission, program model, governance, school and student performance, finance, and operations. The Renewal Evaluation Form, also included as an addendum to the contract, describes the standards by which schools will be evaluated for renewal. For example, if there is an average score below 2, the school is placed on probation, recommended for one year renewal, and required to do a School Improvement Plan. Alternatively, if the average score is above 3, the school will receive a five year renewal.
- The authorizer’s decisions and resulting actions are consistent across the portfolio. The AAP states, “If a school receives an average score above 3.0 in all five (5) of the performance categories, the length of the contract will be five (5) years.” A review of renewal documents shows that these decisions are consistent with the scoring in the AAP. It should be noted that both Prodeo Academy and International Spanish Language Academy received an average score above 3 in all five performance categories and, according to the contract, IQS was planning to grant both schools a five-year term; however, both schools requested a three-year renewal contract, which IQS granted. Additionally, STEP Academy had one category that was below a 3 (Governance scored a 2.9), and IQS granted renewal due to the school’s history of high student performance, which they believed outweighed the tenth of a point difference.
- The authorizer’s decisions and resulting actions align with its AAA/AAP. The AAP states that the school must demonstrate satisfactory performance in all the indicators to be renewed, and that the ScoreCard will be used to determine renewal. The AAP also details strict scoring criteria for renewal. If a school received an average score below 2.0 then the school is recommended for a one-year contract and must complete a school improvement plan. Schools that earn a score of 2.0-3.0 earn a probationary contract (no more than three years) and must complete an improvement plan. Those schools that earn a 3.0 or above in all five performance categories are awarded five-year contracts. As noted above, some schools (Prodeo Academy and International Spanish Language Academy) elected for a three-year contract even though the school was eligible for a five-year contract. Although STEP Academy scored below the threshold by 0.1 in one area, IQS granted them a five-year contract renewal based on the school’s history of high performance.

- The authorizer’s renewal standards and processes align with nationally recognized quality authorizing standards. For example, the B.9 Alignment with NACSA Standards document lists alignment to several standards for renewal. The document shows that the authorizer has a transparent and rigorous process for termination and renewal that uses academic, financial and operational performance data. IQS bases renewal on objective evidence defined in the contract as it uses the ScoreCard for annual reports, and the Renewal Evaluation Form, both of which form the basis for the renewal decisions. The authorizer also revokes a charter during the term if there is evidence of underperformance, as seen in the MLA Intervention and Termination document. The authorizer grants renewal only to schools that have achieved the standards and targets: this is seen in the scoring guidelines in the AAP and in the renewal contracts. The ScoreCard and Renewal Evaluation form, in addition to annual and mid-year reports, are also evidence that renewals are not based on political or community pressure. Criteria for charter revocation is communicated in Cadre Meetings and school leader meetings as confirmed by the school leader training materials and the cadre meeting materials in the IQS Additional Documents. The authorizer communicates renewal or termination decisions to the school community, as confirmed by emails in the IQS Additional Documents. The MLA Intervention and Termination document shows that the authorizer explains in writing any rights of legal or administrative appeal.
- Level 2 indicators were met for the term of the review as evidenced by the AAP, Renewal Evaluation Form and ScoreCard.
- The authorizer’s renewal standards and processes reflect a clear strategy to promote high quality charter schools. The scoring mechanism outlined in the AAP and in the Renewal Evaluation Form shows that schools that do not show evidence are not renewed. The narrative also states that schools that meet the expectations of the contract receive a five-year renewal, and those that do not receive less than a five-year renewal. The MAPES Cohort Two Charter School Leadership Survey as well as the Annual School Survey FY16-FY20 also show a clear strategy to promote high quality charter schools. For example, 100 percent of respondents agreed or strongly agreed that the authorizer explained high quality charter schools.
- The authorizer’s decisions have not consistently resulted in high quality charter schools. The authorizer practices have resulted in only five high-quality schools (18 percent of operational schools within its portfolio) over the term as identified by MDE. These include Beacon Academy (2016, 2017), Cyber Village Academy (2017), International Spanish Language Academy (2016, 2017, 2018), Nasha Shkola (2018), and STEP Academy (2016, 2017, 2018, 2019, 2020).

Key Evidence:

- B.9 Narrative
- AAA/AAP
- FY 2016 Annual Report – Innovative Quality Schools
- FY 2017 Annual Report – Innovative Quality Schools
- FY 2018 Annual Report – Innovative Quality Schools
- FY 2019 Annual Report – Innovative Quality Schools
- IQS School Contracts
- ScoreCard
- B.9 Alignment with NACSA Standards
- Contract Renewal Evaluation Form
- MLA Intervention and Termination
- Charter Renewal Evaluation Form
- 20.090-01 MLA Letter of Delay
- 20.11-17 IQS MAPES Compliance Data Spreadsheet
- IQS Additional Documents
- IQS MAPES Additional Evidence
- 2016 High-Quality School List – Final
- 2017 High-Quality School List – Final
- 2018 High-Quality School List – Final
- 2019 High-Quality School List – Final
- MAPES Cohort Two Charter School Leadership Survey – Innovative Quality Schools
- Authorizer interview, September 21, 2020

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

MAPES Performance Measures B Rating for Innovative Quality Schools is 2.35.

Performance Measures B: Rating Drivers

- IQS' new charter school application is rigorous with clear and transparent processes, and its decisions have been consistent over the portfolio of schools.
- Oversight processes are consistent and rigorous, with expertise being applied appropriately. Furthermore, all schools are monitored through mid-year and annual reports and school improvement plans.
- The authorizer consistently promotes innovative model and practice replication. Specifically it highlights and connects schools to promote innovative practices.
- Although the authorizer holds charter schools in its portfolio accountable to academic, financial and operational performance standards through its ScoreCard, contracts do not have clear and consistent school-specific performance outcomes that are agreed to before the contracts are signed.
- The authorizer has clear processes in place to address complaints, intervention and corrective action. This includes use of a school improvement plan that is tailored to a school's individual needs.
- Renewal decisions consistently align with the authorizer's AAP and are consistent across the portfolio.

Performance Measures B: Recommendations

- Check contracts and affidavits for statutory compliance prior to submission to MDE. Create a process by which to systematically revise and update contracts and affidavits in alignment with MDE continuous improvement feedback.
- Ensure that all contracts have clear performance outcomes with metrics in all appropriate sections, which can be agreed to before the contract is signed. Consider including School Improvement Plans within contracts with schools.

Appendix A: Authorizer Portfolio Information

Operational Schools: Bdote Learning Center, Beacon Academy, BlueSky Online Charter School, City Academy, Cyber Village Academy, Duluth Public Schools Academy, ECHO Charter School, Edvisions Off Campus School, International Spanish Language Academy, Jane Goodall Environmental Sciences Academy, Level Up Academy, Metro Tech Academy, Minisinaakwaang Leadership Academy, Minnesota Excellence in Learning Academy, Minnesota New Country School, Modern Montessori Charter School, Nasha Shkola, Notre Ecole, Paladin Career and Technical High School, Prodeo Academy, Progeny Academy, St. Paul City School, St. Paul School of Northern Lights, STEP Academy, Success Academy, Technical Academies of Minnesota, The Journey School, Upper Mississippi Academy, Venture Academy, Watershed High School

Preoperational Schools: Academy of Construction and Engineering Science, Aim Academy of Science and Technology, Cross River Charter School, Gentry Academy, Kalonn Academy, Kandiyohi Academy

Closed Schools: East-West International Education Academy, Flex Academy, MILROY Area Charter School

Never Opened Schools: N/A

Schools that have transferred into portfolio: BlueSky Online Charter School, City Academy, Minisinaakwaang Leadership Academy, St. Paul City School

Schools that have transferred out of portfolio: N/A

Merged schools over the term of the review period: Saint Paul City School

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.