

Minnesota Authorizer Performance Evaluation System (MAPES) Performance Report

Authorizer Information

Authorizer: Osprey Wilds Environmental Learning Center

Authorizer Type: Charitable Organization

Evaluation Period: January 2016 – December 2020

Report Issue Date: December 7, 2020

Characteristics of the Authorizer

- Osprey Wilds Environmental Learning Center's (OWELC) mission is to "ensure quality academic and environmental literacy outcomes for Minnesota students through effective charter school authorizing." Its focus on environmental education is at the forefront of the authorizer's work and present in its application materials, evaluation and renewal processes, and in its technical assistance and support.
- OWELC has maintained a portfolio of 34 operational schools throughout the term of the review. Its portfolio consists of schools throughout Minnesota dedicated to four authorizer-specific priorities: incorporating environmental programming; establishing governing boards that include youth; utilizing personalized or individualized learning as central component of the academic program; and committing to bringing together students of different backgrounds, including socioeconomic, ethnic and cultural.
- The authorizer's practices reflect its commitment to the continuous improvement of charter schools. Through its application process, oversight and evaluation processes, and within its contracts, the authorizer provides extensive and intentional feedback and clear corrective actions to improve all aspects of school performance.

Overall Performance Rating

MAPES Overall Performance Rating for Osprey Wilds Environmental Learning Center is 3.81: Exemplary

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

A.1: Authorizing Mission (2.5 percent)*	4
A.2: Authorizer Organizational Goals (1.25 percent)**	4
A.3: Authorizer Structure of Operations (2.5 percent)	3
A.4: Authorizing Staff Expertise (2.5 percent)	3
A.5: Authorizer Knowledge and Skill Development of Authorizing Leadership and Staff (2.5 percent)**	3
A.6: Authorizer Operational Budget for Authorizing the Portfolio of Charter Schools (2.5 percent)	4
A.7: Authorizer Operational Conflicts of Interest (2.5 percent)	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)**	1
A.10: Authorizer High-Quality Authorizing Dissemination (1.25 percent)**	4
A.11: Authorizer Compliance to Responsibilities Stated in Statute (3.75 percent)	4
Total Performance Measures A Rating:	3.25

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

B.1: New Charter School Decisions (11.25 percent)*	4
B.2: Interim Accountability Decisions (11.25 percent: 3.75 percent for expansion requests; 3.75 percent for ready to open standards; 3.75 percent for change in authorizers)	
Expansion Requests (3.75 percent)	4
Ready to Open Standards (3.75 percent)	4
Change in Authorizers (3.75 percent)	4
B.3: Contract Term, Negotiation and Execution (7.5 percent)	4
B.4: Performance Outcomes and Standards (11.25 percent)	4
B.5: Authorizer's Processes for Ongoing Oversight of the Portfolio of Charter Schools (7.5 percent)	4
B.6: Authorizer's Standards and Processes for Interventions, Corrective Action and Response to Complaints (3.75 percent)**	4
B.7: Charter School Support, Development and Technical Assistance (3.75 percent 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)	4
Total Performance Measures B Rating:	4.00

**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 narrative states that the Osprey Wilds Environmental Learning Center's (OWELC) mission is to "ensure quality academic and environmental literacy outcomes for Minnesota students through effective charter school authorizing." It should be noted that the authorizer changed its name on July 1, 2020 from Audubon Center of the North Woods (ACNW). An email from the authorizer to its portfolio of schools dated July 1, 2020 announced this name change, yet stated that its mission statement remained the same. OWELC's mission aligns with Minnesota Statute, section 124E.05 Subd. 4(1).
- The narrative states that the authorizer carries out its mission through its contracting, which includes both academic outcomes and environmental goals; its new school application, which requires applicants to include both academic goals focused on student achievement and an explanation of how the school will incorporate students' environmental awareness; and other applications (e.g., grade and site level expansion, change of authorizer, renewal) that require evidence of sound academic programs and a commitment to develop the environmental literacy of all students. Review of the authorizer's annual report template shows that it requires schools to report on both academic achievement and its environmental education activities.
- Review of OWELC's Approved Authorizing Plan (AAP), which was revised on December 20, 2019, confirms that the authorizer's mission aligns with its AAP. Despite the change in name of the authorizer over the term of the review, it has retained its former mission.
- The authorizer's annual report for FY 2019-20 includes its current mission. Additionally, a screenshot of the Minnesota Association of Charter Schools (MACS) website directory listing for OWELC confirms that its mission is posted publicly.
- OWELC's mission is verified internally with consistent responses from interviewed individuals. During the interview with the authorizer, participants verified the mission, stating that it is to ensure quality academic and environmental outcomes for Minnesota students through effective authorizing. They noted that OWELC is unique in its focus on environmental education and that schools must have environmental programming in order to be authorized by OWELC. Furthermore, they stated that the authorizer is focused on academic outcomes and that they support environmental education as a mechanism to ensure those outcomes.
- The authorizer's mission is verified by external references. For example, the annual report for North Shore Community School from SY 2018-19 includes the authorizer's mission.
- OWELC's mission is consistently verified externally by school representatives. During the interview, school leaders stated that the authorizer's mission is to create a portfolio of schools that are committed to quality academic instruction and quality environmental education for all students. Additionally, participants explained that, in addition to its focus on academic outcomes and environmental education programming, OWELC is focused on financial and operational accountability to ensure that the schools in its portfolio are viable and in compliance with applicable law.

Key Evidence:

- A.1 Narrative
- AAA/AAP
- 2020.07.01 OW Leaders Retreat Update
- Osprey Wilds MN Association of Charter Schools
- OW FY20 WBWF & Annual Report Guidelines FINAL
- NSCS Annual Report and WBWF 2018-19 Submitted 11.05.2019
- Authorizer interview, September 14, 2020
- Charter school leader interview, September 14, 2020

A.2 Measure: Authorizer Organizational Goals

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

Performance Level Rating: Level 4-Exemplary

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

- The authorizer has clear organizational goals, criteria and timeframes for achievement. According to the narrative (which the ACNW 2016-18 strategic plan for the charter school division confirms) the authorizer has seven organizational goals (i.e., outcome statements) with specific measures and strategies, which it has been implementing. Each of the outcome strategies has timelines (e.g., July 1, 2015 through July 18, 2018) and each strategy has a timeframe (e.g., summer 2017). According to the narrative (and as a review of the OW Strategic Plan and CSD Work Plan confirms), while the authorizer was without a formal strategic plan in FY 2019, its charter school division continued to implement the 2016-2018 plan until it adopted a new strategic plan in the fall of 2019 for FY 2020-2025.
- OWELC implements organizational goals from its AAP. The authorizer's outcome statements align with the goals in its AAP. For example, the AAP outlines four primary goals, including: 1) authorizing high-quality new schools; 2) authorizing high-quality/high-performing existing schools; 3) improving performance of current authorized schools in areas of academic performance, environmental education, financial performance and operations; and 4) closing schools that are not meeting contractual or statutory expectations. Notes from the Strategic Plan Meeting in 2017 show that outcome statements are directly aligned with the above goals, including the strengthening of the authorizer's charter school portfolio, implementing its AAP with fidelity and consistency, improving academic performance of students, increasing environmental literacy and improving the performance of schools in areas of finance, governance and compliance.
- The authorizer's organizational goals align with its authorizing mission. In addition to aligning with the primary goals of the AAP, the strategic plan includes outcome goals around improving academic performance and environmental education, in alignment with OWELC's authorizing mission. For example, the third outcome statement in the strategic plan states that the authorizer's schools will improve the academic performance of its students and the fourth outcome statement states that the authorizer's schools will increase the environmental literacy of their students, faculty, staff and school community.
- OWELC is actively measuring progress on its organizational goals. The Going Forward, Looking Back PowerPoint presentation shows that the authorizer tracked its progress in alignment with its strategic plan for FY 2016, FY 2017, and FY 2018. Review of the FY 2019 annual report shows that the authorizer continued to review its goals in alignment with its strategic plan around areas of charter school academic, operational, and financial performance, as well as schools' implementation of environmental education.
- OWELC evaluates its work regularly against its authorizing mission and organizational goals and implements plans for improvement. The FY 2019 annual report states, and governing board meeting minutes from November 23, 2019 show, that OWELC engaged in strategic planning for FY 2020-25, which, according to the authorizer during the interview, required self-evaluation of the FY 2016-18 strategic plan in order to set new goals for the upcoming five-year period. Annual reports show that the authorizer evaluates its work on an annual basis against its goals, which are aligned with its mission, as well as the FY 2020-25 strategic plan. Additionally, the aforementioned documents confirm that OWELC is implementing a plan for improvement.

Key Evidence:

- A.2 Narrative
- AAA/AAP
- FY 2016 Annual Report – Osprey Wilds ELC
- FY 2017 Annual Report – Osprey Wilds ELC
- FY 2018 Annual Report – Osprey Wilds ELC
- FY 2019 Annual Report – Osprey Wilds ELC
- 2017.02.13 ACNW CSD FY16-FY18 Strategic Plan Meeting Notes
- 2018.08.22 ACNW CSD Strategic Planning Retreat Agenda
- ACNW Strategic Plan 2016-18
- ACNW CSD FY-16-FY18 Strategic Work Plan 06.07.2015
- FY20-25 Strategic Plan CSD Work Plan 01.27.2020
- OW Strategic Plan 2020-25
- 2019.11.16 Going Forward, Looking Back
- ACNW Board Meeting Minutes_11.23.2019
- Strategic Plan Monitoring, FY16-21
- Authorizer interview, September 14, 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 3-Commendable

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

- A clear structure of duties and responsibilities is defined and charted, and it sufficiently meets the needs of OWELC's portfolio of charter schools. The staff organization table shows that the authorizer has five staff, including a Director of Charter School Authorizing, an Associate Director, an Authorizing Specialist, a Data and Communications Coordinator as well as an Administrative Assistant who supports the contracting process and the execution of financial performance data. The table indicates a list of primary and additional responsibilities for each position, and job descriptions for four out of five positions also outline each staff member's duties.
- The authorizer's structure of duties and responsibilities is updated when necessary. The narrative describes, and review of OWELC's staffing history confirms, that staffing structures have evolved in order to better meet the needs of the schools within the authorizer's portfolio. The staffing history table shows that, although OWELC's portfolio has remained consistent at 34 operational schools, in 2018 and 2019, it had two pre-operational schools, and in 2020 had one pre-operational school. Over the term, the authorizer's full time employee (FTE) level grew from 4.1 FTE in 2016 to 5.3 FTE in 2020, with the addition of a 0.3 FTE finance analyst in 2017 and 1.0 FTE Minnesota GreenCorps member in 2020, which, according to the narrative, is a position that supported schools in the implementation of effective environmental education. Moreover, the staffing history table shows that OWELC has grown its external contractor pool from three contractors in 2016 to ten contractors in 2020.
- OWELC appropriately manages, retains, and safeguards school and student information and records relating to authorizing. Review of the data sharing agreement between the Minnesota Department of Education (MDE) and the authorizer from May 2015 confirms that it agreed to de-identify student data in its capacity as an authorizer. In the narrative, the authorizer states that it uses Dropbox for Business for the cloud storage of digital files as well as Epicenter, which was confirmed through a screenshot the schools in OWELC's portfolio in Epicenter. Epicenter invoices between 2015 and 2019 confirm that the authorizer has had safeguarding systems in place since the beginning of the review term.
- The authorizer's structure of duties, responsibilities and staffing levels were verified internally as being sufficient. During the interview with the authorizer, participants explained that the organization currently has four full-time and one part-time staff members, including a director, who ensures that the authorizer's work is aligned with its AAP and strategic plan, oversees interventions and takes the lead on financial issues; an associate director, whose primary function is to oversee formative and summative evaluations, especially around academics and environmental education; an authorizing specialist, who leads the evaluation process; and a data and communications coordinator (formerly the GreenCorps member), who focuses on compliance as it relates to Epicenter, adherence to bylaws and board membership.

- The authorizer’s practices are consistently verified externally by school representatives as being sufficient. In the MAPES Cohort Two Charter School Leadership Survey, 78 percent of respondents (n=23 total respondents) agreed or strongly agreed that the staffing level of the authorizer is sufficient to meet the needs of their school, while 22 percent disagreed or strongly disagreed. During interviews with charter school leaders, respondents described different experiences working with OWELC. They explained that each school is assigned a point of contact from the authorizing staff who is their primary contact. While some respondents explained that OWELC is responsive to their questions and needs, others stated that they have experienced delays in getting answers or feedback from OWELC. Respondents indicated that there was significant staff turnover with the former director’s departure, but now that the new staff is in place, they are beginning to see stability and responsiveness.
- Although the authorizer’s current staffing model has a clear structure of duties and responsibilities and sufficiently meets the needs of the portfolio of charter schools, due to significant staff turnover between 2018 and 2019 described by school leaders during the interview, level 2 indicators were not met for the term of the review. During interviews, charter school leaders stated that during the staffing transition, there was a period during which staffing gaps limited the authorizer’s capacity to sufficiently meet the needs of its portfolio of charter schools, including responding to inquiries and providing consistent support.

Key Evidence:

- A.3 Narrative
- AAA/AAP
- OW CSD Staff Organization 05.30.2019
- OW CSD Staffing History
- Director of Charter School Authorizing, 2019
- Associate Director of Charter School Authorizing, 2018
- Authorizing Specialist, 2019
- Administrative Assistant, 2020
- ACNW_MDE Authorizer Data Sharing Agreement Executed 05.12.2015
- Dropbox Security Whitepaper_2019
- Epicenter Features and Functionality
- Epicenter Datacenter Security Summary 01.23.2020
- Schools in OW Epicenter
- OW Dropbox Invoices, 2016-20
- Authorizer interview, September 14, 2020
- Charter school leader interview, September 14, 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: 3-Commendable

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

- OWELC staff has appropriate experience, expertise and skills in charter school academics, finance, operations and law. Review of resumes shows that OWELC's staff, including contractors, bring experience and expertise in academics, including licensure as superintendent, K-12 principal, and teaching in areas of life sciences, elementary education, English as a second language (ESL) and early childhood education. Additionally, the Associate Director brings operations experience from a K-8 charter school. A resume and certificates of service show that Sandra Schmidt, a contractor with OWELC, has experience in finance. Aaron Seligman, a current OWELC board member, has a law license in the state of Wisconsin. As stated previously, OWELC experienced significant staff turnover between FY 2016 and FY 2018, during which time the authorizer's director departed the agency, as did three of four staff members. Review of the staffing history table for OWELC (formerly ACNW) shows that the current staffing structure has been in place for two years. Documentation (e.g., resumes, licenses) for former employees, including David Greenberg (former Director), Mike Schultz (former Performance and Accountability Manager), and Rhianon Sargent (former Charter School Authorizing Specialist) shows that the previous staff held experience and expertise in charter school academics, operations and finance.
- Authorizing staff are able to sufficiently oversee the portfolio of charter schools. In the Charter School Leadership Survey, 78 percent of respondents agreed or strongly agreed that the authorizer's staffing level is sufficient to meet the needs of their school, 13 percent disagreed, and 9 percent strongly disagreed. During the interview with charter school leaders, participants stated that the current staff have sufficient experience in charter schools to support their needs. They further explained that, in cases when the staff does not have the knowledge, they will seek out external guidance or support to ensure that schools receive the information that they need. This includes connecting schools with each other in order to share information.
- Authorizing staff experience, expertise and skills align with nationally recognized quality authorizing standards. OWELC's current staffing aligns with NACSA's human resource principle of employing "competent personnel at a staffing level appropriate and sufficient to carry out all authorizing responsibilities in accordance with national standards, and commensurate with the scale of the charter school portfolio." As stated above, the core staff at the charter school division bring extensive experience around academics and environmental education. One of its board members brings law expertise and knowledge specific to charter schools, and while interview participants explained that OWELC's director provides significant guidance around finance to schools, resumes confirmed that OWELC also contracts with an external contractor to provide financial guidance. OWELC's staff to school ratio has remained consistent at approximately 1:8 over the term of the review.

- Level 2 indicators were not met for the authorizer term to date. As stated above, although the authorizer's current staffing model brings appropriate experience, expertise and skills in charter school academics, operations, and finances, due to significant staff turnover between 2018 and 2019, level 2 indicators were not met for the term of the review. During interviews, charter school leaders indicated that during the staffing transition, there was a period during which staffing gaps limited the authorizer's capacity to sufficiently oversee its portfolio of charter schools.

Key Evidence:

- A.4 Narrative
- AAA/AAP
- OW Staff Expertise Summary
- Staff Resumes (Washington, Anderson, Ewer, Palme, McCutcheon, Greenberg, Schultz, Sargent)
- Evaluator Resumes (Hodge, Seligman, Lewis, Yesak, Gill, Johnson, Jett Greenberg, Aguilar, Grigsby-Harris, Haenke, Schmidt)
- Evaluator Licenses (Nyembwe, Gonzalez, Johnson, Jett, Greenberg, Aguilar Grigsby, Wehman)
- OW CSD Legal Expenses, 2016-2020
- 6 Sandra Schmidt BS Diploma & Certificates
- 5 WI State Bar Screenshot Aaron Seligman
- MAPES Cohort Two Charter School Leadership Survey – Osprey Wilds ELC
- Authorizer interview, September 14, 2020
- Charter school leader interview, September 14, 2020

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

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

Performance Level Rating: Level 3-Commendable

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

- Professional development is intentional and planned to build the knowledge and skill base of authorizing leadership and staff. The professional development spreadsheet shows that OWELC staff participated in intentional professional development from 2015 through 2020. The spreadsheet indicates trainings (e.g., NACSA Conference, UMN Equity Learning Sessions) and those areas addressed through the training (e.g., academic, finance, operations, law, environment).
- Professional development aligns with authorizer's operations, mission, and organizational goals for overseeing its portfolio of charter schools. In addition to ensuring that the trainings are planned to build knowledge and skills around charter school authorizing, the spreadsheet includes information about which of the four organizational goals were addressed through the training, including increasing and improving the academic performance of schools within its portfolio and strengthening schools' environmental literacy, both of which are aligned with OWELC's mission.
- Professional development attended is sufficient to fulfill the commitments provided in the authorizer's AAP, which states that the authorizer will: 1) send staff to specific mission- and vision-aligned conferences, workshops, and trainings in Minnesota and nationally; 2) engage staff in job-embedded PD; 3) set and evaluate annual professional development goals aligned with the authorizer's operations, vision, and goals as part of the staff evaluation process; 4) network with authorizing colleagues in Minnesota and nationally; 5) engage in state and national charter school task forces, work groups and other initiatives; and 6) provide training for authorizer board and charter school committee members. As stated above, authorizer staff attended trainings in alignment with its mission and organizational goals. Additionally, review of its onboarding framework demonstrates that the staff engaged in job-embedded training (e.g., readings, drafting of agendas, check-ins), networked with colleagues through regular attendance at Minnesota Association of Charter School Authorizing (MACSA) meetings and National Association of Charter School Authorizing (NACSA) annual conferences, and engaged in work groups such as the Minnesota Regional Turnaround Strategy Group and the Bush Foundation Learning Journey. Review of a sample employee performance evaluation form shows that the listed goals are aligned with the authorizer's mission and strategic plan, including training around qualitative evaluation, developing an intervention process for environmental education, and building relationships with entities throughout the state in pursuit of educational equity and environmental literacy in areas underserved by charter schools. Review of authorizer annual reports how that members of the charter school division staff provided training of OWELC board members at committee meetings and board meeting. Topics included an overview of the school expansion process (FY 2017), school performance as it relates to charter school contracts and state assessments (FY 2018), and how OWELC evaluates school performance (FY 2019).

- Professional development is attended regularly by authorizing leadership and staff, is ongoing and occurs more than once a year. The authorizers Professional Development spreadsheet for shows that OWELC's leadership and staff attended trainings on a regular basis between FY 2016 and FY 2020. This includes monthly attendance at MACSA meetings, the NACSA conference, OWELC board retreats, regional strategy group sessions, and internal trainings related to environmental education, academic instruction, and law.
- Professional development attended by authorizing leadership and staff is customized to meet the needs of the authorizing leadership and staff. According to the authorizers annual reports from FY 2016, FY 2017, FY 2018, and FY 2019, staff are evaluated at least once a year, during which they identify professional development needs. The authorizer then dedicate resources to ongoing professional development. Review of the Employee Performance Evaluation Form includes questions about completion of required trainings (e.g., CPR, First Aid, AED), and what supplemental trainings the employee has completed, and employee growth opportunities, as well as long-term career goals and desired training.
- Professional development is not measured and evaluated. Although review of both the training pre-approval request from September 2018 and the reimbursement request from January 2019 show that the authorizer described the importance of the NACSA conference and sessions attended, there is no documented evidence that the authorizer measures or evaluates its professional development. During the authorizer interview, participants explained that OW evaluates professional development through their individual performance evaluations and during staff meetings; however, there is not documented evidence to show how the authorizer is measuring the impact of professional development on their capacity as an authorizer.

Key Evidence:

- A.5 Narrative
- AAA/AAP
- FY 2016 Annual Report – Osprey Wilds ELC
- FY 2017 Annual Report – Osprey Wilds ELC
- FY 2018 Annual Report – Osprey Wilds ELC
- FY 2019 Annual Report – Osprey Wilds ELC
- OW Professional Development, 2016-20
- ACNW Authorizing Specialist Onboarding Framework 10.21.2019
- OW Employee Evaluation Form
- 2018.09.18 ACNW NACSA Authorizer Training Pre-Approval Request
- 2019.01.10 ACNW Authorizer Training Reimbursement Request NACSA-signed
- Staff Eval Notes 06.29.2018 Redacted

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

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

Performance Level Rating: Level 4-Exemplary

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

- OWELC's resource allocations for authorizing are at least consistent with resources to portfolio size ratio committed in its AAP. The authorizer's budget shows that its operational schools have remained consistent at 34 schools between FY 2016 and FY 2020, and that the authorizer added two pre-operational schools in FY 2018 and FY 2019, and one in FY 2020. The budget indicates that revenues have grown over the term of the review from approximately \$450,000 to approximately \$594,100. The resources to portfolio ratio was approximately \$13,230 per school in FY 2016 and grew to approximately \$17,000 per school in FY 2020.
- The authorizer demonstrates that resource allocations are sufficient to fulfill authorizing responsibilities and are commensurate with the needs and scale of its portfolio (e.g., income, expenditures and number and size of the charter schools in the portfolio). The budget shows that the bulk of revenues come from charter school authorizer fees. According to the narrative and as reflected in its budget, the authorizer's expenditures were primarily allocated toward Epicenter (approximately \$35,000 annually) and trainings, meetings, and professional development for schools, which increased over the review term from approximately \$16,000 in FY 2016 to approximately \$22,700 in FY 2020. During the Charter School Leader interview, participants stated that the authorizer focuses on giving schools the resources that they need, including providing leaders training opportunities and access to a community of experts.
- OWELC staff changes occurred in relation to its portfolio size. As stated above, the authorizer's FTE grew from 4.1 in FY 2016 to 5.3 in FY 2020, with the addition of a 0.3 FTE finance analyst in 2017 and 1.0 FTE GreenCorps member in 2020. During the interview, the authorizer explained that the GreenCorps position has since been converted to a FTE 1.0 and that the current staff FTE is 4.3. As such, the authorizer has maintained a ratio of authorizing staff to school of 1: 8.3 in FY 2016 and 1:8.4 in FY 2020. According to the A.4 narrative, the staffing growth changes align with the authorizer's mission and respond to the increased number of pre-operational schools.
- Resource allocations align with nationally recognized quality authorizing standards for financial resource commitments. The authorizer's staffing and financial model align with NACSA's Quality Standard #1: Agency Commitment and Capacity. As stated above, the largest expenditures from the authorizer's budget are on Epicenter and on trainings, meetings and professional development for schools, which ensures that it is committing its financial resources to conducting its authorizing duties effectively. 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. It should be noted that NACSA suggests that authorizers with portfolios of under 50 schools should aim for a 1:6 ratio (authorizing staff to school). As stated above, in FY 2016, the authorizer had a staff to school ratio of 1:8.3 and in FY 2020 the staff to school ratio was 1:8.4.
- Level 2 indicators were met for the authorizer term to date. Review of the authorizer's projected budget and actual budget between FY 2016 and FY 2020 shows that the budget submitted with the AAP was within 10 percent of anticipated revenues and expenditures.

- The authorizer allocates resources to achieve nationally recognized quality authorizing standards, revising budgets as necessary. In alignment with NACSA's Principles and Standards, OWELC determines the financial needs of its authorizing office and devotes sufficient financial resources to fulfill its authorizing responsibilities, as shown above. Furthermore, a comparison between the projected budget submitted with the AAP and the authorizer's actual budget shows that it revised its budget to reflect changes in portfolio size, revenues, staffing and other expenditures between FY 2016 and FY 2020.

Key Evidence:

- A.4 Narrative
- A.6 Narrative
- AAA/AAP
- OW CSD Budget to Actual FY16-20
- ACNW FY16-FY21 AAP Budget_07.01.2016
- Statements of Income and Expenditures – FY 2016, FY 2017, FY 2018, FY 2019
- Authorizer interview, September 14, 2020
- Charter school leader interview, September 14, 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: Although the authorizer has a clear policy to address conflicts of interest, it does not implement the policy in all decision-making processes concerning the portfolio of charter schools.

- While the authorizer has a clear conflict of interest policy for authorizing, it is not intentionally implemented. The authorizer has a clear conflict of interest policy that states that all individuals involved in any aspect of charter school oversight and decision-making at OWELC, with any actual, potential or perceived conflict of interest with any authorized charter school or applicant shall disclose the same. Furthermore, it states that individuals must review, sign and date the policy when first contracted, hired or seated and then on an annual basis thereafter. While the OW Signed COI Forms FY21 document indicates that the authorizer's board members, charter school committee members and staff signed conflict of interest statements for FY 2021, there is no documented evidence that the authorizer required all individuals within its policy (i.e., Charter School Division staff, contracted evaluators, OWELC's Executive Director, members of the Charter School Committee, and member of OWELC's Board of Directors) to sign conflict of interest statements on an annual basis as specified in its policy. Moreover, an email sent from the authorizer to two contractors on January 9, 2019 asks each of them to return the signed conflict of interest policy as part of the new school application review process; however, there is only a signed conflict of interest statement from one contractor (Bondo Nyembwe) and not the second (Cynthia Gonzalez). Review of the Charter School Leadership Survey shows that although 70 percent of respondents agreed or strongly agreed that they are familiar with OWELC's conflict of interest policy, 30 percent disagreed or strongly disagreed.
- The authorizer does not ensure that application review and decision-making processes are free of conflicts of interest, nor does it require full disclosure of any potential or perceived conflicts of interest between reviewers or decision-makers and applicants. As stated above, in 2019, the authorizer requested that its two new school application evaluators submit conflict of interest forms; however, documents only include one. Furthermore, although the school appears to have pre-operational schools in FY 2018, FY 2019 and FY 2020, there is no documented evidence of all reviewers (2018 and 2019) having signed conflict of interest forms.

Key Evidence:

- A.7 Narrative
- AAA/AAP
- OW CSD Conflict of Interest Policy 03.12.2020_AW
- OW Evaluator COIs, 2016-20
- OW Signed COI Forms FY21
- OW CSD Conflict of Interest Policy-AW Submitted 03.12.2020
- 2019.01.09 Email to New School Application Evaluators
- 2019.06.17 DJ CCS Request
- 2020.02.13 Dan Jett COI Disclosure
- 2019.01.08 COI Training
- MAPES Cohort Two Charter School Leadership Survey – Osprey Wilds ELC

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.

- OWELC has a clear policy to ensure school autonomy. Its policy on authorizer role and school autonomy outlines how the authorizer will maintain the school's autonomy, including, but not limited to: supporting and advancing Minnesota charter school law; being a catalyst for charter school development to satisfy unmet educational needs; offering only voluntary technical assistance to authorized schools; and ensuring clarity, consistency and transparency in developing and implementing its authorizing policies and practices.
- OWELC's policy on school autonomy establishes and recognizes schools' authority over academics, financials and operations and respects each school's authority over its day-to-day operations. The authorizer's policy stresses that OWELC must engage in responsible oversight of charter schools by ensuring that the schools have autonomy, to which they are entitled, while being held accountable to statutory and contractual expectations. Additionally, Section 3.1 of OWELC's contract template states that the authorizer's responsibility is to oversee the school's academic, financial, operational, environmental and student performance, while Section 2.2 describes the independent status of schools, and specifically states that the authorizer shall have no authority or control over operational, administrative or financial responsibility. Section 2.3 of OWELC's contract template addresses the separation of financial obligations between the school and authorizer.
- The authorizer's practice aligns with policy; OWELC holds charter schools accountable for performance outcomes and compliance with statute rather than for processes and inputs. For example, after receiving a complaint from a staff member at Natural Science Academy on November 26, 2017 regarding their dismissal, the authorizer responded in an email dated December 7, 2017 that its responsibility was for the oversight and evaluation of the school and that it does not get involved in employment disputes. In another email dated July 31, 2020, the authorizer provided its school leaders with guidance around the process for making re-opening decisions and clarified in a follow-up email with a school that this was guidance, not a requirement.
- The authorizer's policy aligns with nationally recognized quality authorizing standards. In alignment with NACSA's second core principle (i.e., uphold school autonomy), OWELC's policy on the authorizer's role and school autonomy ensures that OWELC assumes responsibility not for the success or failure of the individual schools, but for holding schools accountable to their performance; preserving core autonomies crucial to school success (e.g., independent governing board, personnel, school vision and culture, instructional programming, design, use of time); and holding schools accountable to outcomes rather than processes.

- The authorizer’s policy and practices to ensure schools’ autonomy are verified externally with consistent responses from interviewed individuals. In the Charter School Leadership survey, 87 percent of respondents agreed or strongly agreed that the authorizer preserves the school board’s autonomy over policy matters related to operating the school. 8 percent disagreed or strongly disagreed. 4 percent neither agreed nor disagreed. When asked in the survey whether, in the past five years, they have felt that the authorizer supported their school’s autonomy, 78 percent responded yes while 22 percent responded no. During the interview, charter school leaders explained that OWELC’s practices around ensuring school autonomy have improved over the term of the review in conjunction with the change in leadership and ensuing staffing turnover. Some participants explained they previously felt “micro-managed,” but that the new director and staff have been clearer in communicating their oversight and monitoring roles and respecting schools’ autonomy, while continuing to provide technical support to schools who seek it out.

Key Evidence:

- A.8 Narrative
- AAA/AAP
- OW Authorizer Role and School Autonomy Policy 05.25.2016
- OW Contract Template FINAL Updated 03.03.2020
- MAPES Cohort Two Leadership Survey – Osprey Wilds ELC
- 2017.12.07 Authorizer Role Clarification Redacted
- 2020.07.31 Excell School Authority Example
- MAPES Cohort Two Charter School Leadership Survey – Osprey Wilds ELC
- Authorizer interview, September 14, 2020
- Charter school leader interview, September 14, 2020

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

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

Performance Level Rating: Level 1-Approaching Satisfactory

Finding: The authorizer does not regularly evaluate its internal ability (capacity, infrastructure and practices) to oversee its portfolio of charter schools.

- Although the authorizer regularly self-evaluates its work against its authorizing mission and organizational goals (as described in A.2), OWELC does not regularly evaluate its internal ability to oversee its portfolio of charter schools. According to the FY 2018 annual report, the authorizer hired an external consultant to guide a full-scale review of the organization's capacity. This review included reviewing practices in alignment with the AAP, job descriptions and organizational charts, meeting with key stakeholders (e.g., staff, consultants) and making recommendations regarding a revised staffing structure to better meet the organization's needs. As a result, the organization implemented strategic staffing changes beginning in FY 2019. Although the authorizer's annual reports state, and the authorizer confirmed during the interview, that as part of its self-evaluation activities, OWELC staff gathers feedback from its portfolio of schools through the annual Leaders Retreat and through periodic surveys, review of Leader Retreat agendas show that the authorizer provided sessions around building schools' capacity (e.g., ensuring staff retention, using evaluation to drive school turnaround, effective board governance), and that follow-up surveys asked participants to evaluate the sessions. There is not documented evidence to show that the authorizer used leader retreats and follow-up surveys to gather data on its internal ability to oversee its portfolio of schools.
- Self-evaluations are not intentional and planned to build the authorizer's capacity, infrastructure and practices to oversee its portfolio of charter schools. As stated above, review of the authorizer's leader retreat survey results shows that respondents evaluated the retreat sessions; however, the survey did not include questions related to the authorizer's capacity, infrastructure and practices to oversee its portfolio of charter schools.

Key Evidence:

- A.9 Narrative
- AAA/AAP
- FY 2016 Annual Report – Osprey Wilds ELC
- FY 2017 Annual Report – Osprey Wilds ELC
- FY 2018 Annual Report – Osprey Wilds ELC
- FY 2019 Annual Report – Osprey Wilds ELC
- OW Leaders Retreat Agendas, 2016-20
- OW Leaders Retreat Survey Results, 2016
- OW Leaders Retreat Survey Results, 2017-20
- 2019 ACNW Leaders Retreat Evaluation
- ACNW_CSD FY16-FY18 Strategic Work Plan 06.07.2015
- FY20-25 Strategic Plan CSD Work Plan 01.27.2020
- Authorizer interview, September 14, 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 and assists other authorizers in high-quality authorizing.

- The authorizer engages with other authorizers to improve the authorizing community of practice. Annual reports from MACSA meeting minutes between FY 2016 and FY 2019 show that representatives from OWELC participated in MACSA meetings on a regular (e.g., monthly or bimonthly) basis. Additionally, MACSA Committee Structure documents for FY 2019 and FY 2020 indicate that representatives from the authorizer participated on the executive, finance and standards and principles committees during both years.
- OWELC regularly shares best practices with and provides technical assistance to other authorizers. Annual reports outline ways in which the authorizer has shared its best practices with other authorizers, including the former director serving in a role as coach in the sixth Leaders Program Cohort for NACSA between 2016 and 2019. Additionally, a letter from the Minnesota Guild dated August 11, 2020 thanks OWELC for providing extensive support between 2018 and 2020 in the areas of the new school application process, charter expansion application process and Epicenter, in addition to providing general resources. In October 2019, a representative from NACSA emailed the authorizer in thanks for presenting during the 2019 NACSA Leaders Conference. A third email dated August 6, 2020 from the Partnerships Coordinator at Bethel University thanks the authorizer for sharing best practices and sharing resources during the COVID-19 pandemic, including providing technical assistance to the schools in their portfolio.
- The authorizer's best practices and technical assistance are sought out by other authorizers. An email from the Director of the Office of Educational Opportunity at the University of Wisconsin dated December 26, 2019 demonstrates that the director is seeking out assistance in the areas of board evaluation, notices of deficiency or other interventions and other evaluation tools. Additionally, emails from other Minnesota authorizers show that OWELC has been repeatedly sought out by others to share best practices as resources. For example, in April 2019, the Minnesota Guild emailed OWELC to ask about their process for contract renewal. It also reached out for support in October 2019 regarding starting an Affiliated Building Company (ABC) and in January 2020 regarding renewal evaluation guidance.

Key Evidence:

- A.10 Narrative
- AAA/AAP
- FY 2016 Annual Report – Osprey Wilds ELC
- FY 2017 Annual Report – Osprey Wilds ELC
- FY 2018 Annual Report – Osprey Wilds ELC
- FY 2019 Annual Report – Osprey Wilds ELC
- MACSA Minutes, FY 2016-FY 2020
- FY19 MACSA Committee Structure Approved 09.07.2018
- FY20 MACSA Committee Structure Approved 06.07.2019
- 20.08-11 Letter of Thanks to ACNW-OW
- 2019.10.14 NACSA Conference Session_ What A Good School Means to Me
- 2019.12.26 Letter of Thanks to ACNW-UW
- 2019.04.18 Guild Request for Renewal Evaluation Summary
- 2019.10.18 Guild Request for ABC Resource
- 2020.01.15 Guild Request for Renewal Evaluation

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

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

Performance Level Rating: Level 4-Exemplary

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

- According to MDE, since the start of the current term, the authorizer was 100 percent compliant in all areas including submission of authorizer annual reports, statement of income and expenditures, new school affidavits, supplemental affidavits, change in authorizers, new charter contracts, renewed charter contracts, merger charter contracts and attendance at MDE required trainings.

Key Evidence:

- A.11 Narrative
- MAPES Compliance Data Spreadsheet – Osprey Wilds ELC

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

MAPES Performance Measures A Rating for Osprey Wilds Environmental Learning Center is 3.25.

Performance Measures A: Rating Drivers

- OWELC has a clear mission for authorizing and clear organizational goals, criteria and timeframes for achievement, that are aligned with the mission. Its mission and goals are communicated internally and externally, and the authorizer's processes and practices are aligned with its mission and goals.
- OWELC allocates its resources strategically in order to support the schools in its portfolio and ensure that it fulfills its responsibility as an authorizer. Its budget and actualized revenues and expenditures are consistently within 10 percent, and resource allocations are aligned with national standards for quality authorizing, including the authorizer's staff to school ratio.
- OWELC has a clear policy in place that ensures that it preserves the autonomy of the schools within its portfolio. The authorizer providing oversight, monitoring, and technical assistance in a way that does not infringe on schools' roles and responsibilities.
- The authorizer has met all submission deadlines over the term of the review, making it 100 percent compliant with its reporting.
- The authorizer has provided significant professional development to its internal staff, board and to charter school committee members during the term of the review in alignment with its AAP.
- The authorizer did not follow its policy by ensuring that all of its board members, charter school committee members, and staff sign conflict of interest statements on an annual basis throughout the term of the review.
- While OWELC has a strategic plan in place, it does not gather data on a regular (i.e., annual) basis and in a way that is intentional to self-evaluate its capacity, infrastructure and practices and ensure that its oversight practices and support of its portfolio of charter schools are sufficient.

Performance Measures A: Recommendations

- In alignment with the AAP, create annual professional development trainings for OWELC board members and for charter school committee members around the mission and goals of the organization's authorizing work, as well as other areas of demonstrated need.
- Create a system to ensure that all board members, charter school committee members, staff and external contractors sign conflict of interest statements annually or when they become employed by OWELC, in alignment with the conflict of interest policy.
- Create mechanisms to gather feedback from stakeholders around OWELC's internal ability to support its portfolio of schools. Plan regular opportunities to review the data to inform OWELC's capacity, infrastructure and practices.

Performance Measures B: Authorizer Processes and Decision-Making

B.1 Measure: New Charter School Decisions

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

Performance Level Rating: Level 4-Exemplary

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

- The authorizer's application process is comprehensive; includes clear application questions and guidance; and includes fair, transparent procedures, timelines and rigorous criteria. OWELC's new school application specifies that it is seeking applicants in four categories (e.g., environmental education as central component; planning teams and board that include youth; use of personalized or individualized learning; and, schools that bring together students of different backgrounds). According to the guidelines, applicants are required to submit a notice of intent to apply that includes the vision, mission, educational approach, founders and leadership structure of the proposed school. The authorizer then provides comprehensive feedback on each of these components. The application requires applicants to provide information for the following: executive summary; vision and mission; need and demand; purpose; goals, student performance expectations and evaluation plan; educational program; governance, management and administration; financial management; operations; marketing and outreach; school founders; and early learning program (if applicable). It includes a clear timeline that identifies key dates (e.g., notice of intent to apply, due date of full application, final decision) and describes each of the application steps in detail. Additionally, the application includes a detailed description of the evaluation process that includes four levels of evaluation, and explains that the evaluation will include a thorough review of the written application, a substantive in-person interview and due diligence to examine the applicant's experience and capacity. This includes a rubric that is aligned with the application and rates each section of the application on a scale from inadequate, approaches, or meets requirements, as well as identifies strengths and concerns/questions.
- The authorizer's decisions and resulting actions are consistent across the portfolio of charter schools. The spreadsheet used by the authorizer to track its new school application decisions shows that it received 12 new school proposals between 2016 and 2020. Of those 12, four new schools were approved, six denied, and two withdrew their applications after receiving written feedback. Review of the authorizer's written feedback to applicants on the new school review rubrics show that its decisions are consistent across its portfolio of charter schools. For example, approved applications met most of the criteria on the rubric, were comprehensive, and indicated the applicants' understanding of the issues, concepts and/or ability to open and maintain a charter school, whereas denied applications were generally incomplete, general or lacked compelling answers for elements within the applications (e.g., need and demand, start-up plans, operating elements). Approved applicants must satisfactorily meet eight "ready to open" requirements during the pre-operational period to open, including: enrollment, board governance, appropriate school site, funding, learning program, transportation and key staff. The document also includes a comprehensive checklist to guide schools through the ready-to-open process.

- The authorizer’s decisions and resulting actions are outlined in the authorizer’s AAP through OWELC’s new school application guidance document, which was submitted as an attachment to the AAP. Specifically, the guidance document lists the authorizer’s priorities (e.g., environmental education, boards with youth, personalized or individualized learning as central component and schools that bring together people of different backgrounds) and outlines the application, evaluation and decision-making process. As stated above, over the term of the review, the authorizer received 12 new school applications, of which four were approved. Decisions and resulting actions aligned with the new school application that were submitted as part of the AAP.
- The authorizer’s new charter school application and decision process aligns with nationally recognized quality authorizing standards. OWELC’s new school application process aligns with NACSAs Quality Standard #2: Application Process and Decision-Making. As described above, the authorizer states its chartering priorities, articulates comprehensive questions, and provides clear guidance and requirements regarding the application content and format while also explaining evaluation criteria. The application shows that OWELC welcomes proposals from first-time charter applicants and considers diverse educational philosophies, approaches, and school models (e.g., Montessori).
- The application and decision process reflects a clear strategy to promote high-quality charter schools. The authorizer only approves those applicants who demonstrate high-quality content throughout the entire application, and deny those who do not complete the application to OWELC’s standards. For example, the review rubric for one denied application explains that, “[w]hile the application outlines a unique and compelling education model and a strong founding team, too many aspects of the application are generic inconsistent or underdeveloped.” Another rubric explains that “the application was incomplete in several sections, and in others responses were cursory, making it challenging to determine whether the plans described will reasonably serve students.”
- Level 2 indicators were met for the authorizer term to date. Review of the new school application, which was submitted as part of the AAP at the beginning of the term, and application documents show that OWELC has implemented its application, evaluation and decision-making process for new schools since the beginning of the review term.
- School representatives consistently verify authorizer’s response to guiding question. In the Charter School Leadership Survey, 100 percent of respondents agreed or strongly agreed that the authorizer has comprehensive approval criteria for evaluating new charter school proposals. During the charter school leader interview, participants described an extremely rigorous new school application process, including the submission of a letter of intent, an extensive formal application, the interviewing process and ongoing feedback from the authorizer. They indicated that the application was comprehensive and that they felt that decision-making was transparent and fair.
- The authorizer’s decisions have resulted in high-quality charter schools. Fourteen of its 34 schools (41 percent) have been identified as high-quality by MDE in over the term of the review, with six schools being repeatedly identified as such. These include East Range Academy of Technology (2016, 2018), Great Expectations School (2016, 2018), Higher Ground Academy (2016, 2018, 2019), Noble Academy (2016, 2018, 2019, North Lakes Academy (2018, 2019, 2020), and Swan River Montessori Academy (2018, 2020).

Key Evidence:

- B.1 Narrative
- AAA/AAP
- AAA/AAP
- FY 2016 Annual Report – Osprey Wilds ELC
- FY 2017 Annual Report – Osprey Wilds ELC
- FY 2018 Annual Report – Osprey Wilds ELC
- FY 2019 Annual Report – Osprey Wilds ELC
- OW New Charter School Application Guide Updated 07.01.2020
- OW New School Decisions_FY16-20
- AA Application Review Rubric FINAL 02.15.2019
- ASAHs Review Rubric Full 02.28.2018
- OW New School RTO Guide
- OW New School RTO Calendar
- NACSA-Principles-and-Standards-2018-Edition
- MDE High-Quality Charter Schools 2016, 2017, 2018, 2019, 2020
- MAPES Cohort Two Charter School Leadership Survey – Osprey Wilds ELC
- Charter school leader interview, September 14, 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 4-Exemplary

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

- OWELC's application processes are comprehensive; include clear application questions and guidance; and include fair, transparent procedures, timelines and rigorous criteria. The authorizer's application for grade level, site or early learning program expansion includes a timeline and detailed description of the application process, including: an evaluation process overview; submission of a notice of intent; feedback from the authorizer on submission of notice of intent and invitation to submit full application; and application evaluation. Additionally, the application includes information regarding the implementation of expansion and guidance around the submission of the application. The full application requires applicants to provide the following: a description of the expansion, need and demand; information regarding the current academic performance of the school; submission of the financial management plan; submission of the governance and management plan; a plan for early learning program (if applicable); and a description of the proposed early childhood health and developmental screening program. Additionally, the application includes a rubric that evaluates each section of the application on a scale of inadequate, approaches, or meets, each of which is defined within the application. The authorizer's change of authorizer (i.e., transfer) application includes a timeline and a detailed description of the process, including: an overview of the evaluation process; a notice of intent with feedback; an invitation to submit a full application and information regarding how that application will be evaluated; application format and attachment requirements. The full application requires applicants to provide: a school summary (e.g., description and history of the school); a vision and mission; the need for the school and enrollment; the primary purpose for the school; goals, student performance and evaluation plan; a description of the educational program; a description of governance, management, and administration; the financial management process; operations (e.g., facilities, student discipline, general operations); and how the school will market itself and perform outreach to the community.

- Authorizer’s decisions and resulting actions are consistent across the portfolio of charter schools. According to the expansion application tracking spreadsheet, over the term of the review, the authorizer received 15 expansion requests and approved 12 of them. Notes from the tracker show that approved expansions showed improved or strong academic outcomes, demonstrated need and demand, had a financially viable program, were operationally sound and the school’s board had the capacity to oversee the expansion. Notes show that applications were denied because applicants: did not demonstrate sufficient need and demand; did not include a longitudinal record of student academic performance and growth, board capacity or detailed implementation plan; or did not provide complete responses to questions in the application. Review of the expansion application materials (e.g., formal application, evaluation, budget) for expansion from North Lakes Academy and North Shore Community School demonstrate that the authorizer’s practices are consistent and aligned with its new school application guidance document. Approved applicants must complete “ready to open” requirements (e.g., enrollment, board governance, appropriate school site, funding, learning program, transportation, key staff), which are detailed in OWELC’s expansion and replication ready-to-open guide and calendar. The guide explains that OWELC reserves the right to delay the charter expansion or replication at the time of final determination if it is clear that significant deficiencies exist.
- Authorizer’s decisions and resulting actions, which are outlined in OWELC’s expansion application guidance document, are aligned with its AAP. As stated above, the expansion and change of authorizer applications, as well as the ready-to-open checklist, were submitted as part of AAP attachments. Review of expansion and change of authorizer applications confirm that OWELC’s decisions – approvals and denials – and resulting actions, including feedback and ready-to-open checklists, are aligned with the guidance documents associated with the processes.
- Authorizer’s interim accountability processes align with nationally recognized quality authorizing standards. OWELC’s expansion application process aligns with NACSA’s Quality Standard #2: Application Process and Decision-Making. As described above, the authorizer states its chartering priorities, articulates comprehensive questions and provides clear guidance and requirements regarding the application content and format while also explaining evaluation criteria. The application guidance document, review rubric and approval/denial decisions show that the authorizer encourages expansion and replication of charter schools that demonstrate success and capacity for growth.
- The authorizer’s interim accountability processes reflect a clear strategy to promote high-quality charter schools. OWELC’s strategic plan includes a goal to “increase/improve school and portfolio performance.” According to the narrative, and as reflected in its expansion application, evaluation documents, decision-making tracker and ready-to-open process documents, the authorizer ensures the promotion of high-quality charter schools by: 1) following nationally normed standards; 2) communicating clear and rigorous expectations to schools; and 3) declining requests that do not meet its standards. There is a defined and transparent application process for expansion (e.g., grade level, site or early learning program), and feedback documents show that the authorizer provides continuous improvement feedback to applicants and suggestions for improvement.
- Level 2 indicators were met for the authorizer term to date. Both the school expansion and change of authorizer applications, which, along with the ready-to-open checklist, were submitted as part of the AAP at the beginning of the term, as well as application documents, show that OWELC has implemented its application, evaluation and decision-making process for expansions and transfer schools since the beginning of the review term.

- School representatives consistently verify OWELC’s response to the guiding question. In the Charter School Leadership survey, 86 percent of respondents agreed or strongly agreed that the expansion application was clear; that the review process was clear; and that approval criteria were clear, while 14 percent disagreed or strongly disagreed. Additionally, in the survey, 100 percent of respondents agreed or strongly agreed that, when adding an early learning program, the application, review process and approval criteria were clear. During the charter school leader interview, participants described the expansion process in depth, including the ongoing communication between the school, authorizer and MDE to ensure that the expansion was achieved. Participants described the notice of intent, the need for board approval, the formal application, oversight and feedback from the authorizer and final submission of the supplemental affidavit to MDE for approval. Participants described the authorizer as having an active role in their success around grade-level expansions and transference of authorizer.
- The authorizer’s decisions have resulted in high-quality charter schools. Fourteen of its 34 schools (41 percent) have been identified as high-quality by MDE in over the term of the review, with six schools being repeatedly identified as such. These include East Range Academy of Technology (2016, 2018), Great Expectations School (2016, 2018), Higher Ground Academy (2016, 2018, 2019), Noble Academy (2016, 2018, 2019, North Lakes Academy (2018, 2019, 2020), and Swan River Montessori Academy (2018, 2020).

Key Evidence:

- B.2 Narrative
- AAA/AAP
- FY 2016 Annual Report – Osprey Wilds ELC
- FY 2017 Annual Report – Osprey Wilds ELC
- FY 2018 Annual Report – Osprey Wilds ELC
- FY 2019 Annual Report – Osprey Wilds ELC
- OW Expansion Application Guide
- OW Expansions FY16-20
- OW Expansion & Replication Ready-to-Open Guide
- OW Expansion & Replication Ready-to-Open Calendar
- NLA Application for Expansion Revised 03.26.2018
- NLA 7-yr Expansion Budget FY19-25
- NLA Expansion Evaluation-Final_03.28.2018
- NSCS Early Learning Recognition Evaluation – Final 08.30.2017
- MDE High-Quality Charter Schools 2016, 2017, 2018, 2019, 2020
- NACSA-Principles-and-Standards-2018-Edition
- MAPES Cohort Two Charter School Leadership Survey – Osprey Wilds ELC
- Charter school leader interview, September 14, 2020

B.3 Measure: Contract Term, Negotiation and Execution

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

Performance Level Rating: Level 4-Exemplary

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

- All of the contracts in authorizer’s portfolio of charter schools meet current statutory requirements. According to MDE, since the start of the current term, the authorizer met statutory compliance for 100 percent of its new school contracts, renewal contracts, change of authorizer contracts and merger charter contracts.
- OWELC’s contracts clearly state the rights and responsibilities of the school and the authorizer. Article II of OWELC’s contracts with its schools describes the relationship between the school and authorizer, specifically outlining the rights of the school in Section 2.1, which explains voluntary authorization and Section 2.2, which explains the independent status of the school. Article III of the contract defines the role of the sponsor, such as Section 3.1, which explains its oversight responsibilities.
- The authorizer’s contracting practices are consistent across its portfolio of charter schools. Review of OWELC contracts shows that the authorizer uses a template for the body of its contract and then includes individual school performance goals within supplemental exhibits. This was confirmed by charter school leaders during the interview.
- Contracts were executed no later than the first day of the renewal period. According to MDE, OWELC met the deadline for submission for all of its renewal contracts over the term of the review.
- OWELC executes contract amendments for material changes to current school plans when necessary and not in lieu of conducting renewal evaluations. Article IX of the contract states that if there is a change in applicable law which alters or amends the responsibilities, obligations, rights or remedies of either the school or authorizer, the contract shall be altered or amended. Review of amended contracts shows that they were amended for material changes only and no contracts were amended in lieu of renewal. For example, the admissions policies and procedures and school closure process and plan were amended in the contract between the authorizer and Academic Arts High School on September 8, 2019. Review of the amended contract with Best Academy on June 29, 2020 shows several amendments, including: a change in a clause in the preamble; reviewed academic and academic-related goals; changes in the admissions policies and procedures; changes in the school closure process and plan; and a change in the term of the contract (from a one-year probationary term to a four-year term).
- Level 2 indicators were met for the authorizer term to date. As stated above, all of the contracts were statutorily compliant beginning in January 2016.

Key Evidence:

- B.3 Narrative
- AAA/AAP
- MAPES Compliance Data Spreadsheet – Osprey Wilds ELC
- OW Contract Template FINAL Updated 03.03.2020
- OW Charter School Contracts
- 20.09-04 North Lakes Academy Renewal Contract Compliance Review Rubric -FINAL
- 20.09-04 NLCS Renewal Contract Compliance Review Rubric -FINAL
- Charter school leader interview, September 14, 2020

B.4 Measure: Performance Outcomes and Standards

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

Performance Level Rating: Level 4-Exemplary

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

- Contracts in authorizer’s portfolio of charter schools meet current statutory performance standards. According to MDE, all of the contracts within the authorizer’s portfolio include a description of the school program and the provision of academic and nonacademic outcomes.
- Contracts define clear, measurable and attainable academic, financial and operational performance outcomes and standards, and consequences for meeting or not meeting performance outcomes and standards. For example, the authorizer’s contracts with Aurora Charter School, Excell Academy, Noble Academy and Vermilion Country School have academic indicators including reading growth and proficiency, math growth and proficiency, science growth and proficiency, post-secondary readiness (when applicable) and attendance. Additionally, the contracts include financial management plans that outline financial expectations (e.g., board training in financial oversight, external audits), as well as a governance, management and administration (i.e., operational performance) plan, that outline operational expectations (e.g., governance by school board, compliance with applicable laws and oversight of school budgeting, curriculum and operating procedures). While all the contracts are identified as compliant by MDE, it should be noted that MDE feedback for some schools (e.g., Best Academy, Laura Jeffrey Academy, Oshki Ogimaag Community School) indicates that performance outcomes include z-scores as a measurement for academic outcomes that are no longer an MDE-supported calculation on account of the COVID-19 pandemic and postponement of state testing. When asked about z-scores as a performance measure, the authorizer explained that it historically used z-scores as a way to measure student growth, but that it is in the process of converting to using the North Star system to measure this data. Review of Leader Retreat agendas show that the authorizer reviewed the North Star system with its schools in 2018.
- Performance outcomes and standards are consistent across OWELC’s portfolio of charter schools. Review of contracts shows that the academic, financial and operational expectations described above are included in all of the current contracts between the authorizer and the schools within its portfolio.
- The authorizer’s contracts align with the performance standards of its AAP, which states that the contracts will include four up-to-date performance frameworks (academic, environmental education, financial and operations). Review of contracts show that, in addition to the academic, financial and operational performance standards indicated above, contracts include environmental education performance standards. For example, contracts with Discovery Public School, La Crescent Montessori and STEM School, and Prairie Seeds Academy include environmental education goals related to awareness, knowledge, attitudes, skills and action.

- The authorizer holds its charter schools accountable to academic, financial and operational performance outcomes and standards defined in the contract. Section 3.1 of the contract specifically states that OWELC shall monitor and evaluate each school's performance using the criteria set forth in the contract as related to the school's academic, financial, operational, environmental and student performance. Performance evaluation summaries included in renewal contracts for Riverway Learning Community, Swan River Montessori Charter School, Vermilion Country School, Voyageurs Expeditionary School and World Learner School of Chaska confirm that the authorizer holds schools accountable to their academic, financial, operational and environmental education goals.
- The authorizer executes contracts that align with nationally recognized quality performance standards. The authorizer executes contracts in alignment with NACSA Quality Standard #2: Application Process and Decision-Making in that it plainly establishes performance standards under which schools are evaluated; defines clear, measurable and attainable academic, financial and organizational performance standards and targets that the school must meet as a condition of renewal; and defines sources of academic (e.g., state assessments), financial (e.g., summary of financial statements) and organizational data (e.g., compliance and reporting) that will be used as evidence in evaluating performance.
- OWELC's performance standards reflect a clear strategy to promote high-quality charter schools. Contract language states that improving all pupil learning and all student achievement is the most important factor OWELC will consider in determining contract renewal. Determination of student achievement is based substantially on the school's attainment of its academic and nonacademic goals. Proficiency goals within contracts include a specific measure based on the school's aggregate proficiency index score (e.g., an increase of 3.5 points) or be equal to or greater than that of the state for the same grades. It should be noted that, according to the FY 2017 annual report, the authorizer terminated its contract with Odyssey Academy because the school failed to demonstrate satisfactory academic achievement for all students, including the requirements for pupil performance contained in the contract.
- Level 2 indicators were met for the authorizer term to date. Review of contracts between the authorizer and its schools shows that, since January 2016, in alignment with its AAP, the authorizer's contracts with its schools include clear, measurable and attainable academic, financial and operational performance outcomes and standards, and consequences for meeting or not meeting performance outcomes and standards.
- School representatives consistently verified the authorizer's response to the guiding question. In the Charter School Leadership survey, 91 percent of respondents agreed or strongly agreed that the performance standards in the contract are clear and time-bound. 87 percent agreed or strongly agreed that the performance standards are measurable, while 13 percent disagreed or strongly disagreed. 83 percent of respondents agreed or strongly agreed that the performance standards are attainable, while 17 percent disagreed or strongly disagreed. During the charter school leader interview, participants explained that OWELC has a contract template that it uses consistently across its portfolio. They explained that the bulk of the contract includes legal language around the authorizer's responsibility for oversight and the school's responsibility to uphold applicable laws. Participants also specifically referenced Exhibits G (academic and academic-related goals), H (environmental education goals) and S (performance improvement plan) as the areas of their contracts on which they work with OWELC the most to ensure that standards and goals are specific to each individual school. When asked how OWELC holds its school accountable, participants explained that they are held to the expectations set forth in the contract and that OWELC staff are constantly providing feedback about where the school stands in relation to these goals.

- OWELC's performance standards have resulted in high-quality charter schools. Fourteen of its 34 schools (41 percent) have been identified as high-quality by MDE in over the term of the review, with six schools being repeatedly identified as such. These include East Range Academy of Technology (2016, 2018), Great Expectations School (2016, 2018), Higher Ground Academy (2016, 2018, 2019), Noble Academy (2016, 2018, 2019, North Lakes Academy (2018, 2019, 2020), and Swan River Montessori Academy (2018, 2020).

Key Evidence:

- B.4 Narrative
- AAA/AAP
- FY 2018 Annual Report – Osprey Wilds ELC
- FY 2019 Annual Report – Osprey Wilds ELC
- Leaders Retreat Agenda –2018
- OW Charter School Contracts
- MDE Charter School Contract Review Rubrics
- MDE High-Quality Charter Schools 2016, 2017, 2018, 2019, 2020
- MAPES Cohort Two Charter School Leadership Survey – Osprey Wilds ELC
- Charter school leader interview, September 14, 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 4-Exemplary

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

- OWELC has clear processes for oversight and monitoring. According to the narrative and as confirmed by its contracts with schools, the authorizer has specific processes in place to ensure adequate oversight of its portfolio, including data review and analysis (e.g., state academic data, annual reports, budgets, financial audits, other compliance documents); site visits and board observations; and feedback and strategic intervention. The contract specifically outlines the following processes: scheduled and unscheduled site visits to review academic goals and achievement, and to verify that the school is complying with applicable law; the evaluation of student performance based on regular assessment data as well as the school's annual report; the submission of monthly financial reports that include budgeted and actual revenues and expenditures. Furthermore, authorizer annual reports confirm that it requires its schools to submit board meeting minutes on a regular basis to ensure compliance.
- The authorizer conducts charter oversight that competently evaluates academic, financial and operational performance and monitors compliance with applicable law. Review of the authorizer's annual reports between FY 2016 and FY 2019 demonstrates that it evaluates academic, financial and operational performance and monitors compliance with applicable law. The authorizer provided an annual overview of expected authorizing activities (i.e., oversight and monitoring) for Natural Science Academy that included monthly review of board meeting documents (e.g., agenda, packet, minutes, financials), attendance at approximately two board meetings, one site visit annually and additionally as needed and monitoring of Epicenter to ensure compliance of task completion. Evaluation and monitoring documents for Natural Science Academy show that the authorizer evaluated the school's annual report on an annual basis; observed at least one school board meeting on an annual basis; and conducted a site visit on an annual basis, providing feedback to the school. A letter of concern from the authorizer to the school's board of directors dated February, 15, 2019 signals that the school did not meet its academic performance target for FY 2018 and indicates that, as a result, the authorizer will conduct two site visits in FY 2019 to provide additional insight on the academic progress of the school. Similarly, academic performance data for Academic Arts High school from FY 2018 shows the school did not meet performance ratings in most areas. As a result, the authorizer sent the school a notice of deficiency on June 19, 2019 and worked with the school to create a remediation plan. Review of FY 2019 academic performance data shows that the school improved its results notably over a one-year time period.
- OWELC's oversight activities align with its stated oversight and monitoring processes in its AAP. According to the AAP (and as the contract confirms), the authorizer's ongoing evaluation criteria, processes and procedures are provided in Exhibit P of the charter contract. Additionally, the AAP states that based on the authorizer's ongoing oversight and evaluation, a school may be placed on formal intervention as indicated in Exhibit P and fully described in Exhibit Q (range of possible interventions) of the charter contract.

- The authorizer’s oversight and monitoring practices are consistent across the portfolio of charter schools. The narrative describes, and documentation shows, that the authorizer requires all of the schools within its portfolio to submit compliance reports (e.g., monthly financial reports, board meeting agendas and handbooks) to Epicenter, which tracks whether schools meet their submission deadlines. Additionally, contracts between the authorizer and its schools use the same template with consistent legal language, and include individualized exhibits to determine academic, environmental education, financial, and operational goals. According to the contract and verified during the charter school leader interview, OWELC conducts annual site review visits, and schools are required to submit an annual report that captures their academic, environmental education, financial and operational performance over the fiscal year.
- OWELC’s oversight processes align 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, annual reports, monthly financial reports, attendance at school board meetings) that is defined within the charter contract (Exhibit P).
- OWELC’s processes for ongoing oversight of the portfolio of charter schools reflect a clear strategy to promote high-quality charter schools. For example, according to the FY 2017 annual report, the authorizer terminated its contract with Odyssey Academy because of the school’s failure to demonstrate satisfactory academic achievement for all students, provide an environment conducive to student learnings and engage in required or appropriate governance and oversight.
- Level 2 indicators were met for the authorizer term to date. OWELC’s oversight and monitoring processes are included as part of the AAP (submitted July 2016) and, according to contracts, Epicenter screenshots and interviews with both the authorizer and school representatives, have been consistently implemented over the review term.
- School representatives consistently verify the authorizer’s response to the guiding questions. During the charter school leader interview, participants described ways in which the authorizer holds schools accountable, including through annual site visits, attendance at board meetings and through the submission of required documents through Epicenter (e.g., monthly financial reports, board meeting minutes).
- The authorizer’s oversight has resulted in high-quality charter schools. Fourteen of its 34 schools (41 percent) have been identified as high-quality by MDE in over the term of the review, with six schools being repeatedly identified as such. These include East Range Academy of Technology (2016, 2018), Great Expectations School (2016, 2018), Higher Ground Academy (2016, 2018, 2019), Noble Academy (2016, 2018, 2019, North Lakes Academy (2018, 2019, 2020), and Swan River Montessori Academy (2018, 2020).

Key Evidence:

- B.5 Narrative
- AAA/AAP
- FY 2016 Annual Report – Osprey Wilds ELC
- FY 2017 Annual Report – Osprey Wilds ELC
- FY 2018 Annual Report – Osprey Wilds ELC
- FY 2019 Annual Report – Osprey Wilds ELC
- AAHS intervention documents
- NSA intervention documents
- NSA Board Meeting Agenda and Packet Submission Detail
- NSA Epicenter Compliance Details, 2016-2020
- ACNW Contract Template - FINAL Updated 06.06.2016
- MDE High-Quality Charter Schools 2016, 2017, 2018, 2019, 2020
- Authorizer interview, September 14, 2020
- Charter school leader interview, September 14, 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 consistently address complaints, intervention and corrective action.

- The authorizer implements clear and comprehensive standards and processes to address complaints, intervention and corrective action. OWELC has a grievance policy that outlines the process by which it will address complaints, including: 1) the receipt of the complaint; 2) determination of whether the allegations in the complaint are related to violations of law, or failure to protect students or uphold public interests; 3) completion of a reasonable inquiry; 4) notification to the school, with required action as necessary; and 5) response to the complainant in writing within thirty days of receipt of the complaint. The authorizer's annual reports and contracts with its schools outline the events and processes that lead to intervention and corrective action. Specifically the contract states that if the authorizer has a concern about the school, or if the school fails to make adequate progress towards achieving its academic or environmental education goals, or to meet financial requirements, or to comply with applicable law or other requirements, OWELC shall determine the appropriate intervention. The contract includes the following scaled interventions: notice to the school leader and/or board chair; formal notice to the school board; notice to school board of charter revocation/termination. As previously stated, Exhibit Q of the contract includes a range of possible interventions.
- OWELC's decisions and resulting actions are consistent across the portfolio of charter schools and align with its stated standards and processes in its AAP. Both the grievance policy and the contract template are included as part of the AAP. Intervention documents from OWELC to Best Academy and Metro Schools, two schools within the authorizer's portfolio, confirm that the authorizer followed its grievance policy. For example, on July 10, 2018, the authorizer sent a letter to the board of directors of Metro Schools outlining a number of complaints. Correspondence between the school and the authorizer demonstrates that the authorizer conducted an investigation, which was followed up with a letter dated October 11, 2018 that included the authorizer's findings. The letter also included requirements (i.e., corrective action) that included specific timelines. In January, April and June of 2019, the authorizer compiled status reports on required actions related to the complaints. On June 17, 2019, the authorizer sent a letter to the school's board of directors indicating the that school's responses had satisfied the authorizer's inquiry. Furthermore, letters from the authorizer to Bright Water Elementary School, Glacial Hills Elementary School, East Range Academy of Technology and Science and Vermilion Country School demonstrate that the authorizer followed its intervention and corrective action plan. In each case, the authorizer sent a notice of concern (intervention level 1) to the school's board of directors indicating the reason for its concern (e.g., academic performance, financial performance, non-compliance on the submission of documents) and included specific corrective actions with timelines.

- Decisions made regarding complaints, intervention and corrective action are aligned with data generated under oversight and monitoring practices. As stated above, the authorizer followed its policies around grievances, intervention and corrective action. Correspondence between the authorizer and schools receiving intervention demonstrates that the authorizer used data from its oversight and monitoring practices (e.g., Epicenter uploads, submission of financial reports, academic assessments) to determine the intervention levels for its schools and subsequent corrective action. For example, in the complaint against Best Academy, the authorizer reviewed related documentation (e.g., outstanding invoices, board meeting minutes, lease agreements, operating budgets) as part of their investigation. In the case of Bright Water Elementary School, the authorizer cited the lack of submission of the school's FY 2017 annual budget and World's Best Workforce Report to the authorizer, as well as their lack of availability on the school's website, each of which is consistent with the contract expectations around oversight and monitoring.
- OWELC's standards and processes align with nationally recognized quality authorizing standards. The authorizer's processes and practices align with NACSA Quality Standard #4: Ongoing Evaluation and Oversight. For example, through its contract, the authorizer makes known the intervention policy and general conditions that may trigger interventions as well as the types of actions and consequences that may ensue. As demonstrated above, the authorizer provides schools with clear, adequate, evidence-based and timely notice of contract violations or performance deficiencies, and allows schools reasonable time and opportunity for remediation. Furthermore, intervention strategies previously described preserve school autonomy.
- School representatives consistently verify authorizer's response to the guiding question. During the charter school leader interview, participants explained that Exhibit S of the contract includes a performance improvement plan that is the basis for any of their improvement work as schools. They also explained that there is a clear process for corrective action in the event that schools do not meet their contract goals. They indicated that the corrective action plans include timelines and describe when and how each action will be monitored. Participants pointed to the contract (Exhibit Q) and explained that there is a scale from notice of concern to school closure, with interventions associated with each level. Finally, participants indicated that the authorizer works closely with schools to resolve concerns.

Key Evidence:

- B.6 Narrative
- AAA/AAP
- FY 2016 Annual Report – Osprey Wilds ELC
- FY 2017 Annual Report – Osprey Wilds ELC
- FY 2018 Annual Report – Osprey Wilds ELC
- FY 2019 Annual Report – Osprey Wilds ELC
- OW Grievance Policy 05.25.2016
- OW Contract Template FINAL Updated 03.03.2020
- Metro School Complaint Documents
- Best Academy Complaint Documents
- 2017.11.09 BWE Notice of Concern-Annual Report
- 2018.01.04 BWE Notice of Concern-Audit
- 2019.03.04 GHES Notice of Concern-Financial
- 2020.02.06 ERATS NOC-Annual Report
- 2020.02.06 VCS Notice of Concern-Epicenter
- Charter school leader interview, September 14, 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 authorizer provides support and technical assistance proactively. According to the narrative, and as meeting agendas and newsletters confirm, the authorizer provides ongoing and regularly scheduled strategic support and technical assistance. For example, agendas from 2016, 2017, 2018 and 2019 show that the authorizer hosts an annual Leaders Retreat for school leaders and board members. Review of *The Sounding Board*, the authorizer's newsletter, shows that it regularly shares information with its charter schools. An agenda from 2019 shows that the authorizer provided a three-day workshop for teachers focused on environment education and provided ongoing resources through its *Into the Field* (environmental education) publication.
- OWELC provides support and technical assistance in a variety of areas. Review of meeting agendas, newsletters and professional development programs demonstrate that the authorizer shares information with its schools in areas such as law (e.g., open meetings), effective board governance; distance learning (e.g., planning, technology, resources) and academic support (e.g., environmental education, special education).
- The authorizer provides support and technical assistance in a manner that preserves school autonomy. According to the narrative, the authorizer provides schools with broad independence in how they achieve agreed-upon goals. According to the authorizer's role and school autonomy policy, all technical assistance offered by OWELC is voluntary, including its annual Leaders Retreat, which, according to the authorizer states and participants confirmed in the charter school leader interview, was transitioned into an optional training rather than a contractual obligation.
- OWELC provides support and technical assistance in a manner that is consistent across the portfolio of charter schools. The authorizer has documented agendas and newsletters to show that it creates supports, trainings and resources that are open to all of its schools. When asked about how the authorizer shares professional development offerings or information about technical support, both OWELC staff and charter school leaders indicated that the authorizer consistently shares information via emails, though Epicenter and during annual Leader Retreats.
- Support and technical assistance are offered regularly, depending on demonstrated need, and support and technical assistance are designed to prevent problems. According to the authorizer's annual reports, OWELC conducts evaluations on each school in the areas of academic, environmental education, finance and operations performance and uses the information to guide ongoing improvement efforts. Review of the authorizer's newsletter *Sounding Board* shows that, in addition to offering topics on trends it is seeing across its portfolio of schools (e.g., board meeting observations), the authorizer also uses this forum to provide updates on legal issues. For example, Issue 12 of the newsletter provides guidance for charter school boards during emergencies (e.g., how to move school board meetings to electronic format during COVID-19).

- Support and technical assistance are designed to promote high-quality charter schools. As stated above, OWELC uses multiple methods (e.g., annual leader retreats, environmental education conferences, resource guides, newsletters) to share best practices and promote high-quality practices around academics, finance, operations, governance and environmental education. For example, Leader Retreat session titles include *Practices of High Performing Charter Boards* (2016), *Comprehensive Needs Assessment Planning* (2016), *Evaluating Instructional Improvement Efforts* (2017), *Focused and Intentional Student Performance Goals* (2017), *What Boards Need to Know about School Finance* (2018), *Accountability and Data Deep Dive* (2019) and *Intentional, Meaningful, and Effective Feedback* (2019).

Key Evidence:

- B.7 Narrative
- AAA/AAP
- FY 2016 Annual Report – Osprey Wilds ELC
- FY 2017 Annual Report – Osprey Wilds ELC
- FY 2018 Annual Report – Osprey Wilds ELC
- FY 2019 Annual Report – Osprey Wilds ELC
- Leaders Retreat Agendas – 2016, 2017, 2018, 2019
- OW Technical Assistance, 2016-2020
- Sounding Board Issues – November 2018, December 2018, April 2019, March 2020, April 2020
- 2019 EE Workshop Agenda-FINAL_07.31.2019
- 2019.06.03 ACNW Environmental Education News
- 2020.04.02 Distance Learning Plan Checklist Updated
- 2020.04.02 Zoombombing and Cybersecurity During Online Meetings
- Into the Field – v.1 - v.7
- Authorizer interview, September 14, 2020
- Charter school leader interview, September 14, 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.

- OWELC has an intentional plan for successful model replication and dissemination of best practices, and it has identified models/practices. According to the AAP, the authorizer encourages model replication and the dissemination of best practices through the following: 1) sharing authorizer and environmental updates and resources on best school practices on website; 2) holding an annual Leaders Retreat during which leaders, teachers and board members learn about and share best practices; 3) providing exemplars of best school practices via Epicenter (e.g., policies, template, and guidance documents); 4) the promotion of school leader and board member networking in order to disseminate best practices; 5) hosting a workshop for school leaders, teachers, and board member to disseminate best practices in environmental education; and, 6) encouraging high-quality charter schools to expand, replicate and document best practices, and providing support to those schools that choose to do so. Review of the Leaders Retreat agendas show that school representatives shared best practices during sessions. As examples, in 2016, a representative from Excell Academy led a session on staff retention strategies and a representative from North Lakes Academy led a discussion on using compensation models effectively; in 2017, representatives from Noble Academy and Cannon River STEM School discussed how they are successfully meeting their mission and how what measures they use to determine this. Finally, review of the 2018 environmental education workshop agenda shows that the authorizer held a three-day training on best practices for environmental education.
- One or more identified models/practices identified by the authorizer are moving toward replication/dissemination. As previously stated, OWELC's mission and goals are focused on ensuring that the schools within its portfolio successfully adopt and implement environmental education programming. During the authorizer interview, participants discussed how OWELC has disseminated effective practices with its schools through its annual leader retreat, environmental education workshops and newsletters and by making templates and resources available through Epicenter. Review of agendas and newsletters confirmed that OWELC disseminates best practices by bringing in external experts to discuss effective models, and it also highlights schools and provides opportunities for them to share their practices with other schools within its portfolio. For example, the 2019 ACNW Environmental Education Teacher Workshop Agenda shows that the authorizer had an external speaker from Climate Generation lead a number of sessions.
- One or more identified models/practices have been realized at or disseminated to one or more schools beyond the original. The narrative explains, and reviews of supplemental affidavits for Agriculture and Food Science Academy (AFSA), Noble Academy and North Lakes Academy confirm, that three of the authorizer's schools applied for and were approved to expand their existing programs. For example, in 2018, AFSA's 5-12 program was approved to expand to serve grades PreK-4 based on the success of its educational model, which combines agricultural, foods science and environmental education. In 2018, North Lakes Academy's 5-12 program was approved to expand and serve grade K-4 based on its high-quality educational program. Finally, in 2016, Noble Academy was approved to expand its K-8 program to add grades 9-12. According to the narrative, in 2017, Noble Academy was also approved to replicate its K-8 program.

Key Evidence:

- B.8 Narrative
- AAA/AAP
- FY 2016 Annual Report – Osprey Wilds ELC
- FY 2017 Annual Report – Osprey Wilds ELC
- FY 2018 Annual Report – Osprey Wilds ELC
- FY 2019 Annual Report – Osprey Wilds ELC
- Leaders Retreat Agendas – 2016, 2017, 2018, 2019
- 2018 EE Workshop Agenda-FINAL_08.01.2018
- 17.09-22 AFSA Grade Level & Prek Affidavit 09.22.2017
- 17.10-31 MDE Letter - ACNW for AFSA Expansion APPROVED
- 18.05-09 NLA Grade Level and Site Expansion Supplemental Affidavit
- 18.06-21 MDE to ACNW-NLA Supplemental Affidavit - Approved
- 16.09-30 Noble GRADE Expansion Supplemental Affidavit
- 16.09-30 Noble SITE Expansion Supplemental Affidavit
- 16.11-03 MDE Letter - ACNW for Noble Site and Grade Expansion-APPROVED
- Authorizer interview, September 14, 2020

B.9 Measure: Charter School Renewal and Termination Decisions

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

Performance Level Rating: Level 4-Exemplary

Finding: The authorizer has clear and comprehensive standards and processes to make high-stakes renewal and termination decisions, and its decisions regularly align with its stated renewal standards and processes and promote the growth of high-quality charter schools.

- OWELC 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 to protect student and public interests. Review of the renewal application guide demonstrates that the authorizer has a comprehensive reauthorization (renewal) application that requires schools to describe their contract fulfillment. Specifically, applicants must describe their mission, vision and statutory purpose; academic performance; environmental performance; financial performance; operations performance; student and parent satisfaction; and the scope of work for an educational service provider or charter management organization (if applicable). Additionally, the application requires applicants to describe the future strategic direction of the school (e.g., projected enrollment, grade level or site expansions, changes to the board, changes to the management structure) and provide a four-year financial plan. According to renewal documents for Best Academy, the renewal process consists of a written renewal application, a renewal site visit and a renewal evaluation based on performance evaluation summaries for academic, environmental education, financial and operations performance. Based on the renewal evaluation, the authorizer then provides a renewal recommendation that includes a recommended term of renewal contract (e.g., one year, three years, five years), which is voted upon by the authorizer's board. Renewal determination is then communicated back to the school.
- The authorizer's decisions and resulting actions are consistent across its portfolio of charter schools. During the authorizer interview, participants explained that their renewal decisions are based on the contract performance framework, with an emphasis on academic outcomes. They indicated that schools who have strong financials but are not meeting student academic outcomes are either placed on probationary contracts of one- or two-years, or else they are not renewed. They also stated that most contracts fall into a three-year term, but that schools with strong academic, environmental education, financial and operational outcomes may earn a five-year renewal contract. Review of schools' renewal contracts confirms the authorizer's explanation, while also showing that the authorizer prioritizes environmental education. For example, review of Aurora Charter School's 2018 renewal contract shows that the school did not meet standards in most academic performance areas, was approaching standards in environmental education, largely met standards in financial and operation and as a result, earned a two-year probationary contract. Conversely, Cannon River STEM School's 2017 renewal contract shows that the school mostly met or exceeded academic performance goals, exceeded its environmental education goals and met financial and operations performance standards, and therefore earned a five-year contract. Yet, a number of schools, including Academic Arts High School (2018), Discovery Woods School (2018), East Range Academy of Technology and Science (2019), Voyageurs Expeditionary School (2019) and Legacy of Dr. Josie R. Johnson Montessori (formerly Bright Water Elementary) (2020) earned three-year contracts as a result of mixed performance in academics, environmental education, finances and/or operations.

- The authorizer’s decisions and resulting actions align with its AAP. According to the Renewal Performance Evaluation submitted as an attachment with the AAP, improving all pupil learning and all student achievement, as measured by the school’s attainment of its academic and academic-related goals, is the most important factor the authorizer will consider in determining charter school renewal. Secondary considerations are the school’s environmental education performance (as specified in the contract), financial and operational performance and compliance with applicable law as set forth in the contract. Review of renewed contracts confirms that those schools who consistently met or exceeded academic performance standards, and who have strong (meets or exceeds) environmental education, financial and operational performance received five-year renewal contracts, versus those schools that did not meet academic performance standards and earned probationary contract terms (three years or fewer).
- OWELC’s renewal standards and processes align with nationally recognized quality authorizing standards. In alignment with NACSA’s Principles and Standards, OWELC’s contracts with its schools define clear, measurable and attainable academic, financial and organizational performance standards and targets that the schools must meet as a condition of renewal. The authorizer also defines the data that will be used to evaluate academic, financial and organizational performance. Additionally, as described above, and in alignment with NACSA’s Standard #4: Ongoing Oversight and Evaluation, the authorizer implements a comprehensive performance accountability and compliance monitoring system that is defined by the charter contract and provides the information necessary to make rigorous and standards-based renewal decisions.
- OWELC’s renewal standards and processes reflect a clear strategy to promote high-quality charter schools. As described above, OWELC includes clear and transparent academic, financial and operational performance frameworks in each contract, only awarding high-performing schools five-year contracts. The authorizer has clear oversight and monitoring processes in place and uses the data to inform its renewal decision-making and resulting actions. During the interview, charter school leaders referred to Exhibit S, which includes the Performance Improvement Plan for those schools who have probationary contracts. The Performance Improvement Plans highlight deficiencies and other issues evident within the Reauthorization Evaluation Form (Exhibit O) and include clear milestones, actions and timelines by which to improve specific indicators or areas. According to the authorizer and charter school leaders during interviews, schools must show that they are working toward improvement in order to transition out of probation.
- OWELC’s decisions have resulted in high-quality charter schools. Fourteen of its 34 schools (41 percent) have been identified as high-quality by MDE in over the term of the review, with six schools being repeatedly identified as such. These include East Range Academy of Technology (2016, 2018), Great Expectations School (2016, 2018), Higher Ground Academy (2016, 2018, 2019), Noble Academy (2016, 2018, 2019, North Lakes Academy (2018, 2019, 2020), and Swan River Montessori Academy (2018, 2020).
- School representatives consistently verified the authorizer’s response to the guiding question. During the charter school interview, when asked to explain the renewal process, participants indicated that there are clear processes in place that include rigorous and transparent standards. They described the renewal rubric aligned with specific performance measures set forth in the contract.
- Level 2 indicators were met for the authorizer term to date. Although the authorizer’s AAP was not approved by the commissioner until September 15, 2016, review of renewal contracts between the authorizer and Prairie Seeds Academy, Swan River Montessori Charter School, River’s Edge Academy, and Great Expectations School set forth in July 2016 (prior to formal approval of the AAP) demonstrate that the authorizer revised its standards and processes and implemented them over the term of the review.

Key Evidence:

- B.9 Narrative
- AAA/AAP
- FY 2016 Annual Report – Osprey Wilds ELC
- FY 2017 Annual Report – Osprey Wilds ELC
- FY 2018 Annual Report – Osprey Wilds ELC
- FY 2019 Annual Report – Osprey Wilds ELC
- OW Renewal Application Guide
- OW Charter School Contracts
- 19.06-19 ACS_FY19-20_Charter Contract Revised 06.19.2019
- 19.09-08 AAHS_FY19-21 Charter Contract Amended 09.08.2019
- 20.07-06 BWE Complete Contract_FY21-23
- 17.07-07 CRSS Charter Contract-Complete FY18-FY22
- 19.10-18 DWS_FY19-21 Charter Contract Amended 10.18.2019
- 19.07-01 ERATS Complete Contract FY20-FY22
- 20.05-14 VES Contract-Complete FY20-FY22 Amended 05.13.2020
- Authorizer interview, September 14, 2020
- Charter school leader interview, September 14, 2020

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

MAPES Performance Measures B Rating for Osprey Wilds Environmental Learning Center is 4.00.

Performance Measures B: Rating Drivers

- OWELC has rigorous and transparent application processes for new school approval, expansions and changes of authorizer, each of which involve multiple evaluative steps (e.g., letter of intent, full application, interviews). The applications are comprehensive and aligned with the authorizer's mission and goals. The authorizer provides extensive feedback to applicants regarding their submissions in an effort to promote high-quality charter schools.
- OWELC's contracting practices are clear, transparent and consistent across its portfolio of schools. All contracts include clear definitions of the roles and responsibilities of the charter school, and individual performance goals in the areas of academics, environmental education, finance and operations, which the authorizer uses during for its oversight and monitoring.
- The authorizer regularly offers proactive professional development, technical assistance and support to its portfolio of schools in a variety of areas, including academics, environmental education, governance, finance and law.
- OWELC's renewal process and decision-making are rigorous and directly tied to performance goals within school contracts. In alignment with its AAP, decisions are primarily focused on academic achievement, with secondary emphasis put on environmental education, financial and operational performance. Renewal terms vary based on school performance, and probationary contracts include Performance Improvement Plans to support school improvement efforts and promote high-quality schools.

Performance Measures B: Recommendations

- Not applicable.

Appendix A: Authorizer Portfolio Information

Operational Schools: Academic Arts High School, Agriculture and Food Science Academy, Aurora Charter School, Aurora Waasakone Community of Learners, Best Academy, Cannon River STEM School, Crosslake Community School, Discovery Public School of Fairbault, Discovery Woods School, East Range Academy of Technology and Science, Excell Academy for Higher Learning, Glacial Hills Elementary School, Great Expectations School, Higher Ground Academy, La Crescent Montessori and STEM School, Laura Jeffrey Academy, Legacy of Josie R. Johnson Montessori School (formerly Bright Water Elementary School), Metro Schools, Minnesota Wildflower Montessori School, New Discoveries Montessori Academy, Noble Academy, North Lakes Academy, North Shore Community School, Northern Lights Community School, Oshki Ogimaag Charter School, Partnership Academy, Pillager Area Charter School, Prairie Seeds Academy, Riverway Learning Community, Swan River Montessori Charter School, Three Rivers Montessori, Vermilion Country School, Voyageurs Expeditionary School, World Learning School of Chaska

Preoperational Schools: N/A

Closed Schools: Minneapolis College Preparatory, Natural Science Academy, Odyssey Charter School, River's Edge Academy

Never Opened Schools: N/A

Schools that have transferred into portfolio: Partnership Academy, North Shore Community School

Schools that have transferred out of portfolio: N/A

Merged schools over the term of the review period: Best Academy

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.