

Minnesota Authorizer Performance Evaluation System (MAPES) Performance Report

Authorizer Information

Authorizer: Bethel University

Authorizer Type: College/University

Evaluation Period: July 2017 – June 2021

Report Issue Date: June 11, 2021

Characteristics of the Authorizer

- Bethel University's College of Arts and Science department authorizes three schools. The university's staff have expertise in many areas and the authorizer relies on colleagues to expand its authorizing knowledge.
- The authorizer's mission is "Bethel sees charter authorization as strategically assisting in the positive growth of innovative education that contributes to the larger dialogue about quality teaching and learning with both proof of conceptual and scalable models."
- The authorizer's current portfolio has three charter schools, leading to a staff-to-school ratio of one-to-three. There is currently one dedicated Bethel staff member, the Partnerships Coordinator, who serves as the primary charter liaison. The Bethel Charter School Oversight Committee works with the Partnerships Coordinator to provide ongoing oversight of the charter schools that Bethel University authorizes.

Overall Performance Rating

MAPES Overall Performance Rating for Bethel University is 3.06: Commendable

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

A.1: Authorizing Mission (2.5 percent)*	3
A.2: Authorizer Organizational Goals (1.25 percent)**	1
A.3: Authorizer Structure of Operations (2.5 percent)	4
A.4: Authorizing Staff Expertise (2.5 percent)	3
A.5: Authorizer Knowledge and Skill Development of Authorizing Leadership and Staff (2.5 percent)**	3
A.6: Authorizer Operational Budget for Authorizing the Portfolio of Charter Schools (2.5 percent)	4
A.7: Authorizer Operational Conflicts of Interest (2.5 percent)	4
A.8: Ensuring Autonomy of the Charter Schools in the Portfolio (2.5 percent)	4
A.9: Authorizer Self-Evaluation of Capacity, Infrastructure and Practices (1.25 percent)**	4
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:	3.55

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

B.1: New Charter School Decisions (11.25 percent)*	3
B.2: Interim Accountability Decisions (11.25 percent: 3.75 percent for expansion requests; 3.75 percent for ready to open standards; 3.75 percent for change in authorizers)	
Expansion Requests (3.75 percent)	3
Ready to Open Standards (3.75 percent)	3
Change in Authorizers (3.75 percent)	3
B.3: Contract Term, Negotiation and Execution (7.5 percent)	4
B.4: Performance Outcomes and Standards (11.25 percent)	1
B.5: Authorizer's Processes for Ongoing Oversight of the Portfolio of Charter Schools (7.5 percent)	3
B.6: Authorizer's Standards and Processes for Interventions, Corrective Action and Response to Complaints (3.75 percent)**	4
B.7: Charter School Support, Development and Technical Assistance (3.75 percent overall weight)**	4
B.8: High-Quality Charter School Replication and Dissemination of Best School Practices (3.75 percent)**	3
B.9: Charter School Renewal and Termination Decisions (15 percent)	3
Total Performance Measures B Rating:	2.90

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

***Continuous Improvement Measure*

Performance Measures A: Authorizer Capacity and Infrastructure

A.1 Measure: Authorizing Mission

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

Performance Level Rating: Level 3-Commendable

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

- Bethel University's (Bethel) mission is stated and fully aligns with Minnesota charter school statute. The A.1 narrative states that the authorizer "sees charter authorization as strategically assisting in the positive growth of innovative education that contributes to the larger dialogue about quality teaching and learning with both proof of conceptual and scalable models." Bethel's mission, which is focused on growing innovative education models as well as quality teaching and learning, aligns with Minnesota Statutes, Chapter 124E, which states that the primary purpose of charter schools is "to improve all pupil learning and all student achievement."
- The response adequately describes how the authorizer carries out its mission by chartering schools. According to the A.1 narrative, Bethel carries out its authorizing mission by "supporting and serving the charter movement" and engaging with other charter organizations. The narrative further points to the authorizer's work to oversee and monitor the ongoing growth of its existing charter schools, specifically around teaching and learning. Review of agendas from Minnesota Association of Charter School Authorizers (MACSA) meetings confirms that the authorizer participates in MACSA meetings on a regular basis. The narrative and authorizer annual reports also explain that the Partnerships Coordinator served as a member of the High-Quality Charter School Methodology Working Group in FY 2019. Additionally, the authorizer's annual meeting agendas and quarterly newsletters show that the authorizer regularly provides opportunities for schools to learn about research-based, innovative practices in alignment with Bethel's mission.
- The authorizer implements the mission from the commissioner-approved authorizing plan (AAP). The mission within the AAP aligns with the mission stated in the Bethel Charter Handbook and in the authorizer's annual reports, confirming that the authorizer implements the mission from its AAP.
- Bethel's mission is verified internally in practice and in documentation at the authorizing organization. In addition to the authorizer's mission being included in the Bethel Charter Handbook, a screenshot of the authorizer's website confirms that Bethel's authorizing mission is posted within the Majors & Programs section in relation to charter school authorizing. According to the website, and as confirmed in meeting agendas, interviews, and authorizer documentation, Bethel participates regularly at the state and national level in ongoing dialogue around quality teaching and learning practices and regularly shares best practices with its portfolio of schools.
- Bethel's mission is verified internally with consistent responses from interviewed individuals. During the authorizer interview, participants articulated Bethel's authorizing mission and described its focus on promoting student achievement through supporting charter schools in the use of innovative, research-based structures.

- The authorizer's mission is not consistently verified externally by school representatives. Although 100 percent of respondents (n=5) agreed that they are familiar with the authorizer's mission in the MAPES Cohort Three Charter School Leadership Survey, during the interview, when participants were asked to articulate the authorizing mission, they described the overall mission of the university at large (to educate and energize men and women for excellence in leadership, scholarship, and service), but not specifically the authorizing mission.
- There was no documented evidence to show how the authorizing mission is included in external references.

Key Evidence:

- A.1 Narrative
- AAP
- FY 2017 Annual Report – Bethel University
- FY 2018 Annual Report – Bethel University
- FY 2019 Annual Report – Bethel University
- FY 2020 Annual Report – Bethel University
- Bethel Charter Handbook
- Charter Statute 124E
- A10 MACSA Board Meeting Minutes
- FY17-21 Charter Newsletters
- FY17-21 Meetings with Charter Leaders
- MAPES Cohort Three Charter School Leadership Survey – Bethel University
- Website Charter Authorizing
- A1 Charter School Authorizing _ Bethel University
- Authorizer interview, March 29, 2021
- Charter school leader interview, March 29, 2021

A.2 Measure: Authorizer Organizational Goals

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

Performance Level Rating: Level 1-Approaching Satisfactory

Finding: The authorizer has organizational goals and timeframes for achievement that are aligned with its authorizing mission and Minnesota charter school statute; however, it does not have clear criteria by which to measure its progress towards its goals.

- Although the authorizer has clear organizational goals and timeframes for achievement, it does not have criteria aligned with the benchmarks by which to measure its progress. For example, the Goals, Benchmarks and Timeline document shows that the authorizer has two goals directly aligned with its mission: 1) support and serve the charter school movement; and 2) support and serve existing charters for ongoing growth for improved teaching and learning. Each of these goals has one to two benchmarks, such as “sharing, collaborating and participating in community of charter schools and authorizers,” and lists a five-year timeframe. However, the benchmarks do not include specific and measurable criteria by which the authorizer will monitor its progress through the five-year timeframe (e.g., how will it share/collaborate/participate, with whom, through what mechanisms?). While the authorizer’s annual reports (FY 2017, 2018, 2019, 2020) refer to its goal of collaborating with schools that are examples of unique models of education and demonstrate support of school choice, there is no specific evidence describing how Bethel has met this goal during each fiscal year. During the authorizer interview, participants explained that the authorizer reviews its progress toward its organizational goals during oversight meetings. Bethel Charter Oversight Committee (BCOC) meeting minutes from June 2020 states that the committee “reviewed the program goals and related activities;” however, there is not further documentation to demonstrate how the committee measured its progress.
- The authorizer implements organizational goals from the AAP. Bethel’s AAP provides a link to the Charter Authorizing Goals, Benchmarks and Timeline document referenced above. However, as stated above, there is no further description as to how the authorizer will measure its progress toward the goals.
- Bethel’s organizational goals align with the authorizing mission. As noted above, the organizational goals outlined in the Goals, Benchmarks and Timeline document are directly aligned with the authorizing mission in Bethel’s AAP. Specifically, the language of the goals is drawn from the authorizing mission.

Key Evidence:

- A.2 Narrative
- AAP
- Goals, Benchmarks and Timeline
- FY 2017 Annual Report – Bethel University
- FY 2018 Annual Report – Bethel University
- FY 2019 Annual Report – Bethel University
- FY 2020 Annual Report – Bethel University
- Authorizer interview, March 29, 2021

A.3 Measure: Authorizer Structure of Operations

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

Performance Level Rating: Level 4-Exemplary

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

- A clear structure of duties and responsibilities is defined, charted and sufficiently meets the needs of the portfolio of charter schools. The Bethel Charter Handbook describes the authorizer's organization and capacity, which includes the Bethel Charter Oversight Committee (BCOC) comprised of a charter liaison (Partnerships Coordinator), who serves as a liaison between the authorizer and the charter schools within the portfolio, a representative from the Education Department, a representative from the president's office, the dean of professional programs, and an ad hoc financial expert. A job description for the Charter School and Partnerships Liaison (Partnerships Coordinator) outlines the essential functions of the position, including, but not limited to, the design and development of school partnerships, oversight of school governance, and academic and financial oversight of charter schools. The job description allocates the Partnerships Coordinator's time in alignment with each job function – both essential and non-essential. The Duties and Responsibilities chart outlines and summarizes each of the four additional BCOC members' roles. For example, in addition to shared duties such as providing advice and guidance, attending BCOC quarterly meetings and annual charter school meetings, and participating in school site visits, each member also has individual duties such as connecting charter schools to legal counsel (representative of the president's office), sharing BCOC work with university administrators (dean of professional programs) and providing experience with contracts, leases and facilities (ad hoc financial expert). This structure of duties is reflected in the organizational chart. Furthermore, the AAP explains that the Partnerships Coordinator, working with the Education Department Chair and BCOC, is responsible for the leadership and management of the Charter School Authorizing Program, including communication and coordination with staff and administrators at the schools and facilitation of oversight.
- The structure of duties and responsibilities are updated when necessary. According to Bethel's AAP, the Partnerships Coordinator will have an increase in time available for charter authorizing in the event that the number of schools in the portfolio increases. However, the authorizer's portfolio has remained consistent at three schools over the term of the review.
- The authorizer appropriately manages, retains, and safeguards school and student information and records relating to authorizing. The narrative states that Bethel uses Google GSuite and Epicenter to manage, retain and safeguard information and records. It explains that GSuite is used as the primary document creation and storage system while school-generated compliance documents are shared and stored through Epicenter. Screenshots of the authorizer's Epicenter dashboard and GSuites folders confirms that the authorizer implements these systems.
- The structure of duties, responsibilities and staffing levels are verified internally at the authorizing organization as being sufficient. During the authorizer interview, participants described the roles and responsibilities of the BCOC and how the committee functions to support the charter schools in its portfolio. They explained that the Partnerships Coordinator is a part-time staff (.79 FTE), 12-month position, with approximately 80 percent of the position designated for charter liaison work (which was confirmed in the job description for that position). Furthermore, they noted that the role of the BCOC is to directly support the Partnerships Coordinator, with the Education Department Chair serving as the first point of contact. This was confirmed by the BCOC Duties and Responsibilities chart.

- Level 2 indicators were met for the authorizer term to date. In the A.4 narrative, the authorizer explained that after the first round of MAPES, the Partnerships Coordinator position was converted to a staff position, and during the authorizer interview, participants explained that the current Partnerships Coordinator was hired in 2016.
- Authorizer practices are consistently verified externally by school representatives as being sufficient. During the interview with charter school leaders, participants explained that there is one staff member (Partnerships Coordinator) who is assigned to support schools. They also indicated that, being affiliated with a university, they have a network of resources that they can draw upon as needed. Participants stated that the Partnerships Coordinator is very prompt and responsive to questions, and often serves as a connector between schools. In the MAPES Charter Leadership Survey, 100 percent of respondents agreed or strongly agreed that the staffing level of the authorizer is sufficient to meet the needs of their school.

Key Evidence:

- A.3 Narrative
- A.4 Narrative
- AAP
- A3 Staff Job Description
- A9 Authorizer Self-Evaluation
- FY17-21 Program Evaluations
- A3 Charter Authorizing Org Chart
- A3 Duties and responsibilities for BCOC members
- A3 Epicenter and G-Suite Evidence
- MAPES Cohort Three Charter School Leadership Survey – Bethel University
- Authorizer interview, March 29, 2021
- Charter school leader interview, March 29, 2021

A.4 Measure: Authorizing Staff Expertise

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

Performance Level Rating: Level 3-Commendable

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

- Authorizing staff have appropriate experience, expertise and skills in charter school academics, finance, operations and law. As indicated above, Bethel is a university-based authorizer and tied closely with the university's education department. According to resumes, the Partnerships Coordinator, who is primarily responsible for oversight and monitoring, has been in place since 2016 and, prior to joining Bethel University, had academic experience in schools serving students ranging from preschool to high school. Resumes also show that the BCOC is comprised of the Education Department Chair, who holds a Doctorate in Education and who has served as a full-time faculty member in the Education Department since 1996. Prior to joining Bethel University, the Education Department Chair served as a junior high school teacher for five years (1984 to 1989). Bethel University's Chief Financial Officer (CFO) also serves on the BCOC and, according to her resume, holds a Bachelor of Arts in Accounting and Management and a Masters of Business Administration. Resumes also include that of an Associate Provost (formerly a Dean) who brings operational experience. According to the narrative, the Bethel University legal counsel serves in the legal areas. During the authorizer interview, participants clarified that the authorizer retains outside counsel as needed, and this was confirmed by an invoice on behalf of Eastlund Hutchinson, Ltd. for work tied to charter school contracts. Bethel's current CFO became a member of the BCOC in 2020. According to the authorizer review and comment submission form, and confirmed by BCOC meeting agendas from December 2016 and September 2017, the former Bethel CFO was a member of the committee during FY 2017 and FY 2018. In the review and comment submission form, the authorizer noted that in FY 2019, an adjunct professor with school finance experience was a member of the committee. While a meeting agenda from October 2018 confirms this person's participation, there is no documented evidence to confirm his financial experience.
- Authorizing staff are able to sufficiently oversee the portfolio of charter schools. The AAP states that Bethel supports its authorizing activities with one part-time position. According to the narrative, the Partnerships Coordinator position was changed from an assigned teaching load to a staff position following the first round of MAPES. Additionally, the position was changed from an academic appointment (nine months) to a year-round position. The job description for the Partnerships Coordinator confirms that the position is .79 FTE over twelve months per year. Moreover, according to the AAP, the authorizer maintains a staff-to-school ratio of one staff member to three charter schools.
- Authorizing staff experience, expertise and skills align with nationally recognized quality authorizing standards. In alignment with the National Association of Charter School Authorizers (NACSA) Principles and Standards (2018), Bethel enlists the expertise and competent leadership for all areas essential to charter school oversight. A review of resumes confirms that BCOC members and external consultants bring knowledge and expertise in education leadership; curriculum, instruction and assessment; special education; performance management and accountability; law; and finance. Additionally, by retaining a Partnerships Coordinator dedicated to oversight of the portfolio of three schools, the authorizer employs 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.

- Bethel's authorizing staff have credentials demonstrating experience, expertise and skills in charter school academics, finance, operations and law. Academic transcripts and diplomas of current and former BCOC members confirm that members have expertise in academics, operations and finance. A certificate also shows that the CFO earned a designation of Certified Management Accountant in May 2008. Finally, a Certificate of Good Standing issued by the State of Minnesota in Supreme Court in April 2021 certifies that the lawyer hired as outside counsel (as verified by invoices) "was duly admitted to practice as a lawyer and counselor in law in all the courts of this state" in October 1977 and is "in good standing."
- Level 2 indicators were met for at least four years but not for the authorizer term to date. As previously indicated, the Partnerships Coordinator has been in place since 2016 and the staffing structure of the BCOC has been present over the term of the review. According to resumes, the BCOC has included university representatives with academic, operations and financial experience, including associate provosts, interim financial officers and academic staff. During the interview, the authorizer noted (and resumes confirm) that it has utilized the university's legal counsel as well as contracted with outside legal counsel, as necessary. As noted above, however, in its review and comment of the draft report, the authorizer stated that, "In FY 2019, an adjunct professor with school finance experience was a member of the committee." Yet, while a BCOC meeting agenda from October 2018 confirms this person's membership, there is no further documentation to confirm his financial experience.

Key Evidence:

- A.4 Narrative
- AAP
- FY17-21 Resume and CV
- A3 Staff Job Description
- A4 Legal counsel invoice
- A4 TAG credentials
- Addleman, John_Transcripts
- Bergen, Randy_Diploma
- Bergen, Randy_Transcript
- Blaz, Amy - Diplomas
- Bonawitz, Katie_Transcripts
- Dahl, Diane_Transcripts
- Finnern, Julie_USD Transcript
- Friess, Greg_Transcript
- Johnson Ross, Heather_Transcript
- Maritn, Jill_Transcripts
- Mignard, Michael_Transcripts
- Tahtinen-Pacheco, Sarah_Transcripts
- NACSA Principles and Standards 2018 Edition
- 2016.12.16 BCOC Meeting Agenda and Minutes
- 2017.9.12 BCOC Meeting Agenda and Minutes
- 2018.10.2 BCOC Meeting Agenda and Minutes
- Attorney Certificate of Good Standing
- Authorizer interview, March 29, 2021

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

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

Performance Level Rating: Level 3-Commendable

Finding: The authorizer regularly builds the knowledge and skill base of its authorizing leadership and staff through professional development that is aligned with 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 FY17-21 Annual Meeting Planner includes agenda items for quarterly BCOC meetings, as well as professional development topics. These include topics aligned with academics, practices and policies. For example, in FY 2018, professional development topics included agency capacity, contracts, closing a school and legislative updates; in FY 2019, the topics focused on elements of successful charter school authorizing; and in FY 2020, topics ranged from online learning, policies around virtual schools and virtual school accountability. Finally, in FY 2021, topics focused on SMART (specific, measurable, achievable, realistic, timebound) objectives and sustainable charter school improvement. The FY17-21 BCOC Onboarding Evidence document demonstrates that sessions have been offered to new members of the BCOC to train them around charter school authorizing, the authorizer's charter program and the role of the BCOC. During the authorizer interview, participants described the professional development that BCOC new members receive as well as the continuous training that is provided to all members. The FY17-21 Prof Dev document summarizes the professional development activity in which the Partnerships Coordinator has participated over the review term, and indicates the skill base (academic, management, facilities, finance, law) as well as the strategic alignment (mission, goals, operations). For example, the Partnerships Coordinator participated in the Minnesota Department of Education (MDE) Secure Reports webinar in January 2017 (an operations professional development) and attended the NACSA Virtual Authorizer Bootcamp between January and March of 2018, which provided skill development in academics, management, facilities, finance and law, while aligning with Bethel's mission, goals and operations. During the authorizer interview, participants described how professional development has been planned to build their knowledge and skills. For example, they described being trained around oversight of online schools when they had an online school applying through the new charter school process. Additionally, they explained that part of the new member onboarding has participants visit different models of charter schools to better understand different innovative practices.
- Professional development aligns with Bethel's operations, mission and organizational goals for overseeing its portfolio of charter schools. According to the narrative, professional development is aligned to address the authorizing mission and organizational goals. As stated above, the FY17-21 Prof Dev document shows the strategic alignment of all professional development attended by the Partnerships Coordinator over the review term. Each conference or webinar is aligned with the authorizer's mission, goals or operations. As noted above, during the authorizer interview, participants described how professional development was planned to build their knowledge and skills (e.g., training around oversight of online schools).

- Professional development attended is sufficient to fulfill professional development commitments provided in the authorizer's AAP. The AAP includes a link to Bethel's Annual Professional Development and Training Plan, which charts the areas in which the Partnerships Coordinator will receive professional development. These include academics (assessments and innovations), practices (authorizing and oversight) and policies (governance and operations). Additionally, the chart notes that current BCOC members will receive quarterly updates in the areas of academics, practices and policies, and new BCOC members will participate in an onboarding training as well as a Minnesota Association of Charter Schools (MACS) training online. As described above, the Partnerships Coordinator and BCOC members receive training around academics, practices and policies through quarterly meetings, webinars and conference attendance. Further, according to the aforementioned documents and the authorizer interview, new members of the BCOC receive onboarding training.
- Professional development is attended regularly by authorizing leadership and staff, is ongoing and occurs more than once a year. The FY17-21 Prof Dev document and MDE conference sign-in sheets show that the Partnerships Coordinator attends meetings and conferences or participates in webinars at least on a monthly basis, including, but not limited to, monthly MACSA meetings, MDE trainings, and annual NACSA conferences.
- Professional development attended by authorizing leadership and staff is customized to meet the needs of the authorizing leadership and staff. During the authorizer interview, participants described both the onboarding process and ongoing professional development that the BCOC receives. For example, participants described (and the FY17-21 BCOC Onboarding document confirmed) that staff watched a video that provides basic context around charter schools, in addition to attending a NACSA online conference. As noted above, members engaged in targeted training on an as-needed basis to ensure that they had oversight capacity (e.g., online schools).
- Professional development is not measured and evaluated. During the authorizer interview, participants explained that they do not currently measure and evaluate professional development. The authorizer training reimbursement request form submitted to MDE for the Charter Schools Program (CSP) Training Grant includes a section for the authorizer to reflect on the training (2020 Independent Charter Schools Virtual Conference). When asked to reflect on how the training attended builds authorizer capacity to support high quality charter schools, the authorizer reflected that the training "added to the base of knowledge of the authorizing staff and provided an opportunity to strengthen connections to another charter organization." However, the authorizer did not have specific evidence that it measured and evaluated the impact of this training on its overall capacity. It should be noted that, during the authorizer interview, the authorizer indicated (and review of the survey confirmed) that the Partnerships Coordinator has created a form to be completed by Bethel's authorizing staff to document and reflect upon professional development; however, this form and process have not yet been implemented.

Key Evidence:

- A.5 Narrative
- AAP
- FY 2017 Annual Report – Bethel University
- FY 2018 Annual Report – Bethel University
- FY 2019 Annual Report – Bethel University
- FY 2020 Annual Report – Bethel University
- FY17-21 Prof Dev
- FY17-21 Annual Meeting Planner
- FY17-21 BCOC Onboarding Evidence
- FY17-21 BCOC Online School Evidence
- 17.01-09 Authorizer Conference AM Sign-in Sheet
- 17.01-10 Authorizer Conference Sign-in Sheet
- 18.07-19 Conference Attendees
- 19.09-09 Conference Sign In Sheet
- 19.12-13 Authorizer Sign In
- 20.12-09 Attendance - Sign In
- A5 PD Documentation and Reflection - Google Forms
- 20.11-24 BU Authorizer Training Reimbursement Request
- Authorizer interview, March 29, 2021

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.

- Bethel's resource allocations for authorizing are at least consistent with the resources to portfolio size ratio committed in its AAP. A comparison of the FY17-21 Budget Model included in the AAP and actual expenditures for that time frame demonstrate that resource allocations are consistent with the committed resources within the AAP. According to MDE and the authorizer, the authorizer's portfolio of schools has remained consistent at three schools. The AAP states that the Partnerships Coordinator will have an increase in time available for charter authorizing in the event that the number of schools in the portfolio increases, which is reflected in the five-year budget model, with staffing expenses increasing by \$10,000 over a three-year period.
- The authorizer demonstrates that resource allocations are sufficient to fulfill authorizing responsibilities and are commensurate with the needs and scale of its portfolio. According to the narrative, and as the Budget Actuals document confirms, the authorizer maintained a positive fund balance and sufficient overall reserve despite differences in projected revenues and expenditures. For example, in the narrative, the authorizer noted that the budget model does not reflect a grant from MDE in 2018 or the maximization of authorizer fees for all schools. Nor did it account for increased dues or fees from MACS and Epicenter, or the hiring of outside consultants for financial reviews. As a result of these differences, the authorizer was able to fulfill its authorizing responsibilities over the term of the review.
- Authorizer staff changes occurred in relation to portfolio size. Bethel's portfolio of charter schools remained at three schools throughout the term of the review; however, it should be noted that according to MDE and authorizer documents, at the time of the review, a fourth school was in the process of applying for transfer into the portfolio. As stated above, the authorizer converted the Partnerships Coordinator position from a nine-month academic teaching load to a part-time staff (0.79 FTE), 12-month position early in the review term.
- Resource allocations align with nationally recognized quality authorizing standards for financial resource commitments. As described above, in alignment with NACSA's Principles and Standards, Bethel determines the financial needs of the authorizing office and devotes sufficient financial resources to fulfill its authorizing responsibilities commensurate with the scale of its portfolio of charter schools. The authorizer meets the NACSA Standard #1: Agency Commitment and Capacity as its staffing ratio is higher than the recommended ratio (at 1:3 versus 1:10 which is NACSA's recommendation). Furthermore, a comparison of Bethel's projected and actual budget demonstrates that the authorizer determines the needs of the authorizing office and devotes sufficient resources to fulfill its authorizing responsibilities, including conducting annual site visits, reviewing applications for new schools, expansions, change in authorizer requests and renewals, as well as hosting professional development meetings and providing technical assistance.
- Level 2 indicators were met for the authorizer term to date. The five-year budget projection covers the term of the review, and the actualized budget shows that funding was sufficient to meet the needs of the portfolio. Moreover, because the size of the portfolio did not change over the term of the review, staffing allocations remained consistent in alignment with Bethel's AAP.

- Bethel allocates resources to achieve nationally recognized quality authorizing standards, revising budgets as necessary. A comparison of projected and actualized budgets shows that, in alignment with NACSA's Principles and Standards, the authorizer revised its budget based on differences in anticipated expenditures and revenues between FY 2017 and FY 2021, while maintaining a surplus over each year.

Key Evidence:

- A.6 Narrative
- AAP
- Bethel Charter Handbook
- FY17-21 Budget Model for AAP
- FY17-21 Budget Actuals for MAPES
- NACSA Principles and Standards 2018 Edition

A.7 Measure: Authorizer Operational Conflicts of Interest

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

Performance Level Rating: Level 4-Exemplary

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

- A clear conflict of interest policy for authorizing exists and is intentionally implemented. The conflict of interest policy, revised in 2020, outlines Bethel's policy in its role as authorizer. It specifically outlines conflicts as they relate to the BCOC, including: 1) using the employee's position to secure benefits, privileges, exemptions or advantages for the employee or their family; 2) acceptance of other employment or contractual relationships that can affect that employee's independence of judgment in the exercise of duties as a member of the BCOC; and 3) service as a board member by a member of the BCOC or Bethel employee for any charter school within Bethel's portfolio without prior written permission from the Education Department Chair, the BCOC, or the university's Provost. The policy states that members of the Bethel community and/or BCOC with any relationships with a Bethel authorized school must disclose that relationship to the Education Department Chair, the Provost, and the BCOC in writing for determination by the university of whether a conflict of interest exists. A Conflict of Interest Form asks people to identify any potential conflicts of interests. In the narrative, the authorizer states that members of the BCOC sign conflict of interest statements annually, as well as College of Arts and Science (CAS) staff, College of Adults and Professional Studies (CAPS) - Graduate School (GS) education departments, and consultants. A letter from the Partnerships Coordinator in 2020 to members of the authorizer's Education Department states that all members of the BCOC, CAS Education Department staff, adjuncts, and faculty, as well as CAPS/GS program leads and supervisors complete the form annually. It should be noted that the 2017 conflict of interest policy states only that members of the BCOC must disclose any relationship with a Bethel authorized school to the committee in writing.
- The authorizer avoids conflicts of interest that might affect its capacity to make objective, merit-based application and renewal decisions (e.g., involvement in school's performance). The conflict of interest policy, which was revised in 2020, outlines Bethel's role as an authorizer, including monitoring and providing feedback on compliance, facilitating the sharing of effective practices and evaluating school performance based on the charter school contract and in alignment with Minnesota Statutes. The policy specifically states that the authorizer shall not enter into the following types of contracts with charter schools that it authorizes: financial management, administration, accounting or auditing services or lease of space. On the Charter School Leadership Survey, 100 percent of respondents stated that they were not aware of violations of the conflict of interest policy made by the authorizer. Further, 100 percent answered that they have not experienced an authorizer's conflict of interest.
- Bethel is able to provide at least one fully documented example of how it has successfully implemented its Conflict of Interest Policy. An agenda from the BCOC meeting on September 12, 2017 includes a link to the conflict of interest policy. An email exchange between an external consultant and the Partnerships Coordinator shows that the consultant completed a conflict of interest statement in October 2020 as requested. It should be noted that Bethel's 2017 policy does not require annual signed signatures or a training around the conflict of interest policy.

- Bethel ensures that application review and decision-making processes are free of conflicts of interest and requires full disclosure of any potential or perceived conflicts of interest between reviewers or decision-makers and applicants. A review of the CIA Example Ridgeway includes the list of individuals who “reviewed, processed and made formal decision” on the change in authorizer request. Review of the signed conflict of interest statements confirms that all five individuals signed conflict of interest statements prior to reviewing the application in October 2020.
- Implementation of policy has successfully prevented or resolved conflicts of interest in a timely, fair and appropriate manner. There is no documented evidence that a conflict of interest has arisen over the term of the review.
- During the evaluation, MDE did not inquire about a specific conflict of interest.
- The implementation and effectiveness of the authorizer’s conflict of interest policy is verified externally with consistent responses from school representatives. During the interview with charter school leaders, all participants agreed that the reviewers Bethel invites to participate in the oversight and evaluation process (e.g., applications, site visits) do not have any direct connection with the school. They also explained that reviewers provide oversight and evaluation with a clear understanding of their role. Charter school leaders noted that they have not encountered conflict of interest issues over the term of the review.

Key Evidence:

- A.7 Narrative
- AAP
- Conflict of Interest Evidence
- Bethel Charter Handbook
- MAPES Cohort Three Charter School Leadership Survey – Bethel University
- CIA Example Ridgeway
- A7 CONFLICT OF INTEREST
- Authorizer interview, March 29, 2021
- Charter school leader interview, March 29, 2021

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 charter schools in its portfolio.

- Bethel has a clear policy to ensure school autonomy. The Bethel Charter Handbook, which is embedded in the AAP, specifically outlines how the authorizer ensures the autonomy of the schools it oversees, including: 1) it does not manage or operate any charter school; 2) it monitors and evaluates school performance and is not responsible for school performance; 3) no member of the authorizer may be on the board of a Bethel-authorized charter school; 4) any technical assistance offered by Bethel to its authorized schools is voluntary and not required. Additionally, within the contract, Section 2.2 outlines the independent status of the school, explaining that “the school is not and shall not be deemed to be a division or part of Bethel” and that the relationship between the authorizer and charter school is “based solely on the applicable provisions of the Charter School Act and the terms of [the] contract or other written contracts or written agreements” between the two parties.
- Bethel’s policy on school autonomy establishes and recognizes the schools’ authority over academics, financials and operations and respects the schools’ authority over the schools’ day-to-day operations. The Bethel Charter Handbook states that Bethel oversees the school board’s management and operation of the school through monitoring and evaluating fiscal, operational, and student performance. Section 2.3 of the contract with its charter schools describes how the financial obligations of the school are separate from the authorizer. Section 3.1 of the contract describes the oversight responsibilities of Bethel, specifically stating that “Bethel shall monitor and evaluate the school’s academic, financial, operational and student performance, including the school’s compliance with the contract and applicable law.” Article VI of the contract outlines operating requirements of the school, including Section 6.1 Governance, which states that “the school board shall decide and be responsible for matters related to the operation of the school including, but not limited to, budgeting, curriculum, programming, personnel and operating procedures.” Section 6.9 describes the school board’s responsibility for “establishing, approving and amending an annual budget in accordance with applicable law.” Section 6.15 makes clear that employment is at the discretion of the school and that an employee hired by the school “shall be an employee of the school for all purposes and not an employee of Bethel for any purpose.”
- Bethel’s practice aligns with policy; the authorizer holds charter schools accountable for performance outcomes and compliance with statute rather than on processes and inputs. In alignment with its policy and the contracts with charter schools, Bethel requires schools to report their performance in the areas of academics, finances and operations. Section 6.7 (a) (4) states that the charter school must provide results of a government required assessment and that the authorizer “will compare data to other schools in order to measure performance.” Section 6.7 (b) outlines Bethel’s authority to conduct site visits to “review academic goals and achievement data to date, evaluate the implementation of the academic program, operations and other matters.” Section 6.9 Finance, Reporting and Compliance states that the school will furnish the authorizer with monthly financial reports that include budget and actual revenue and expenses, cash-flow statements and fiscal year-end fund balance projections. Section 6.11 states that the school will engage an external audit annually of all financial and accounting records, which the school will submit to Bethel. Section 6.14 states that the school will submit an annual report to Bethel. Comparative academic data and screenshots of the Epicenter dashboard confirm that the authorizer’s practices align with the outcome measures set forth within the contracts with its portfolio of schools.

- The authorizer’s policy aligns with nationally recognized quality authorizing standards. Bethel’s contracting practices meet NACSA’s Principles and Standards around performance contracting in that it executes contracts with charter schools that articulate the rights and responsibilities of each party regarding school autonomy. Section 3.2 (Authorizer Fee) indicates the authorizer provides oversight responsibilities set forth in the agreement. Further, the contract outlines the monitoring and oversight mechanisms that the authorizer will implement, ensuring that the accountability system effectively streamlines federal, state and local performance expectations and compliance requirements while protecting the school’s legally entitled autonomy. As noted above, and as interviews with both the authorizer and school leaders confirm, Bethel representatives visit each school as appropriate and necessary – at minimum on an annual basis – for collecting data that cannot be obtained otherwise and in accord with the contract. Finally, documents show that the authorizer periodically reviews compliance requirements and evaluates the potential increase to school autonomy. For example, in June 2019, the authorizer solicited feedback from the schools using Epicenter to determine “what went well and what you would like to see changed for next year” as it relates to both board and school compliance reporting in Epicenter.
- The authorizer’s policy and practices to ensure school autonomy are verified externally, as reflected in consistent responses from interviewed individuals. During the charter school leader interview, participants unanimously agreed that the authorizer ensures the school’s autonomy. They described how the Partnerships Coordinator is deliberate in communicating when a question or request may overstep the bounds of school autonomy, and rather than provide feedback, connects the leaders with other schools. Participants noted that, although the Partnerships Coordinator is present at school board meetings, she does not provide feedback, and, when asked, will explain that it is not her role to provide advice. They explained that the authorizer serves as a resource, especially around trainings (e.g., identifying experts), but has never mandated use of specific resources or speakers by the schools. In the Charter School Leadership Survey, 100 percent of respondents agreed that the authorizer preserves autonomy.

Key Evidence:

- A.8 Narrative
- AAP
- FY 2017 Annual Report – Bethel University
- FY 2018 Annual Report – Bethel University
- FY 2019 Annual Report – Bethel University
- FY 2020 Annual Report – Bethel University
- A8 Documentation
- A3 Epicenter and G-Suite Evidence
- MAPES Cohort Three Charter School Leadership Survey – Bethel University
- NACSA Principles and Standards 2018 Edition
- Charter school leader interview, March 29, 2021

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 4-Exemplary

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

- The authorizer regularly evaluates its internal ability to oversee the portfolio of charter schools. The FY17-21 Program Evaluation document shows that the authorizer self-evaluates its work in a variety of areas that are aligned with NACSA's Principles and Standards for quality authorizing. The chart includes the benchmark, to what degree it has been implemented (i.e., yes, partial, no), guiding documents that serve as a tool for ongoing practices and notes around how the authorizer can accomplish the benchmark. According to the narrative, the authorizer conducts an annual self-evaluation during its spring quarter meeting. This was confirmed by the FY17-21 Annual Meeting Planner, which includes self-evaluation as an agenda item. The Bethel Charter Authorization Program Evaluation surveys from 2016-17, 2017-18, 2018-19, 2019-20 show that the authorizer solicited feedback annually from its schools about its authorizing practices. Additionally, the FY17-21 Program Evaluations document shows that the authorizer provided a survey to school leaders to solicit feedback regarding the authorizer's annual meeting (e.g., communication structures, agendas, etc.).
- Self-evaluations are intentional and planned to build the authorizer's capacity, infrastructure and practices to oversee its portfolio of charter schools. According to the narrative, and as meeting agendas and the self-evaluation forms confirm, the authorizer meets on an annual basis to review its authorizing practices. As noted above, the authorizer's self-evaluation is aligned to NACSA's Principles and Standards for quality authorizing. The annual self-evaluation reviews Bethel's performance in the areas of authorizer capacity and infrastructure; the application process; performance contracting; ongoing oversight and evaluation; and renewal decision-making. According to the narrative, and as the self-evaluation confirms, the authorizer used the evaluation process to update some of its structures and programming. For example, the FY 2017 annual report discusses the creation of the position, Partnerships Coordinator, which assumes responsibilities for communication and coordination with staff and administrators at the schools and facilitates the oversight of the schools within Bethel's portfolio.
- The authorizer develops and implements continuous improvement plans to address findings from its self-evaluation. According to the FY 2017 annual report, the authorizer focused on making internal adjustments in alignment with its Corrective Action Plan. Moreover, the Charter School Authorization Self-Evaluation document, which, according to the narrative and authorizer interview, Bethel reviews annually, includes clear benchmarks, whether or not the benchmark has been implemented, and guiding documents that serve as tools and archives for ongoing practice. It also includes a column that asks, "How do we accomplish this?" Over the FY 2017 to FY 2021 self-evaluations, the document shows that the comment boxes are updated to reflect the ongoing processes and standards that have been put in place by the authorizer. The FY17-21 Program Evaluation document shows that in FY 2018, the authorizer noted that it only partially provided an explanation of the process by which its renewal decisions could be appealed. As a result, the authorizer revised its appeals process for new charter decisions and renewal decisions and included this information in the Bethel Charter Handbook. The handbook shows that there is a chart that clearly outlines the appeal process, including a notice of intent, school board response, informal hearing, plan of correction, withdrawal of notice, and effective date.

- The authorizer evaluates its work regularly against nationally recognized quality authorizing standards and implements continuous improvement plans that result in more effective authorizing practices. As noted above, Bethel's self-evaluation tool is directly aligned with NACSA's Principles and Standards for quality authorizing. Annually, the authorizer reviews its performance in the following areas: authorizer capacity and infrastructure; application process; performance contracting; ongoing oversight and evaluation; and renewal decision-making.
- Bethel utilizes reflective practices to maintain an organizational focus on purposeful improvement. According to the narrative and confirmed by the Self-Evaluation Evidence document, during the BCOC meeting from May 2017, the committee identified a need to revise the area of appeal for renewal and include this into the authorizer's processes and procedures. An ensuing draft shows that the authorizer outlined the elements that might lead to an appeal and the authorizer's procedures and process for response. A completed explanation of the authorizer's appeal process is included for instances including the denial of an application for a new charter and appeal for a determination of non-renewal or termination. BCOC meeting minutes from September 2017 confirm that the new Process and Procedure for New Charter and Renewal Appeals was presented to the committee, which agreed to add it to the authorizer's charter handbook.

Key Evidence:

- A.9 Narrative
- AAP
- Bethel Charter Handbook
- FY17-21 Program Evaluations
- A9 Self-Evaluation Evidence
- BU Self Eval Alignment Table
- NACSA Principles and Standards 2018 Edition

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. The narrative and authorizer annual reports explain (and agendas from MACSA confirm) that the Partnerships Coordinator participated in MACSA meetings on a regular basis. Additionally, the Partnerships Coordinator served as a member of the High-Quality Charter School Methodology Working Group in FY 2019. MACSA agendas also demonstrate how the Partnerships Coordinator served on MACSA’s executive committee in the role of secretary in FY 2017, FY 2018, FY 2019 and FY 2020. The narrative and annual reports also indicate that the authorizer has attended NACSA’s annual conference from FY 2017 through FY 2021 and served on a sub-group facilitated by NACSA focused on Higher Education Institutions Authorizers, specifically as a mentor (August 2019 through October 2020).
- Bethel regularly shares best practices with and provides technical assistance to other authorizers. According to the narrative and annual reports, Bethel shared best practices around development with two Minnesota-based authorizers in FY 2018. Additionally, according to the FY 2019 annual report and an itinerary, in September 2018, the authorizer shared information regarding its authorizing practices with researchers from Japan interested in introducing the model of education in their home country. It should be noted that the itinerary shows two additional meetings in September 2019 and September 2020, as well as follow-up emails between a Japanese representative and the authorizer. Review of emails and the corresponding presentation show that, in FY 2020, the authorizer worked with another Minnesota-based authorizer to create a tool and training session entitled “Distance Learning Plans: Charter School Self-Evaluation and Reflection,” which was shared with MACSA members, MDE’s Charter Center, and MDE’s Principal Development, Support and Evaluation Team. An email from March 2020 shows that the authorizer also created a peer group of Minnesota-based authorizers to prepare for the MAPES review.
- The authorizer’s best practices and technical assistance are sought out by other authorizers. Emails show that the authorizer has been sought out repeatedly by other authorizers, at the state, national and international level. For example, in July 2017, another Minnesota-based authorizer reached out to Bethel to ask for support around the completion of their Corrective Action Plan (CAP). In January 2017, November 2017, and November 2018, Bethel was asked to serve as a site visit team member for another Minnesota-based authorizer. In January 2019, yet another Minnesota-based authorizer asked Bethel to participate in their new school application process. In August of 2019, NACSA reached out to Bethel to ask them to serve as a mentor to share resources with a new authorizer from Wisconsin. In July 2020, a Michigan-based authorizer contacted Bethel to serve as a member on their Engagement Review Team and a research-based group from Alaska contacted the authorizer to gain insights into charter school authorizing. In January of 2021, the founder of Charter Source invited a representative from Bethel to participate in an authorizer panel. As previously described, a team of researchers from Japan also worked with the authorizer to seek out its best practices as they investigated the charter school model for their own country.

Key Evidence:

- A.10 Narrative
- AAP
- FY 2017 Annual Report – Bethel University
- FY 2018 Annual Report – Bethel University
- FY 2019 Annual Report – Bethel University
- FY 2020 Annual Report – Bethel University
- A10 Documentation
- A10 MACSA Board Meeting Minutes

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.

- Since the start of the current term, the authorizer was 100 percent compliant in all the areas stated in the measure origin, including the submission of annual reports, statements of income and expenditures, supplemental affidavits, and renewal charter contracts. The authorizer did not have new charter school contracts or merger charter contracts. Additionally, the authorizer attended all MDE required trainings.

Key Evidence:

- A.11 Narrative
- MAPES Compliance Data Spreadsheet – Bethel University

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

MAPES Performance Measures A Rating for Bethel University is 3.55.

Performance Measures A: Rating Drivers

- The authorizer’s mission is that it “sees charter authorization as strategically assisting in the positive growth of innovative education that contributes to the larger dialogue about quality teaching and learning with both proof of conceptual and scalable models.” This mission is aligned with Minnesota Statutes and drives the authorizer’s oversight, monitoring and technical support practices.
- The authorizer’s staffing structure has clear roles and responsibilities and is sufficient to oversee Bethel’s portfolio of schools. The authorizer staff-to-school ratio of one-to-three is significantly greater than NACSA’s recommendation.
- The authorizer has a clear conflict of interest policy that it implements consistently. Additionally, the authorizer ensures that all reviewers and decision-makers involved in the application and evaluation process are free of conflicts of interest.
- Bethel has a clear policy to preserve the autonomy of the schools in its portfolio, and it consistently implements the policy.
- In alignment with its mission, Bethel disseminates best practices at the state, national and international level, often sharing resources and knowledge with other authorizers.
- The authorizer is consistently compliant in meeting MDE requirements, including attendance at mandatory trainings, submission of charter school contracts prior to deadlines, and the submission of annual reports.

Performance Measures A: Recommendations

- Create clear criteria by which to measure Bethel’s authorizing goals. The criteria should include specific metrics and measures by which Bethel can monitor its program over the five-year timeline.

Performance Measures B: Authorizer Processes and Decision-Making

B.1 Measure: New Charter School Decisions

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

Performance Level Rating: Level 3-Commendable

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

- Bethel's application process is comprehensive; includes clear application questions and guidance; and includes fair, transparent procedures, timelines and rigorous criteria. Bethel's New School Application includes guidance (e.g., instructions and formatting), clear questions in the areas of the Executive Summary, Academic and Educational Program; Fiscal Management – Budget and Finances; Governance and Leadership; Operations and Legal Compliance; and Early Learning (if applicable). The application includes a rubric with specific measures and metrics. The score is based on a three-level rating scale (exceeds standard, meets standard, and does not meet standard). Each rating is described in detail. For example, according to the rubric, in an application that meets the standard, "the response addresses elements in most areas and strengths outweigh weaknesses. Strengths are numerous and response is of sufficient quality and detail that implementation of plans would lead to the development of a high-quality charter school. Weaknesses, if present, are minor and unlikely to adversely impact the school's ability to develop and operate successfully." Moreover, each section has its own metrics that guide reviewers around the key elements that they should be rating within an application. For example, in the measure of finance governance, the metric is that "identified staff, faculty and board members, accountable for the financial integrity of the school, have experience and expertise." The Bethel Charter Handbook includes a timeline for the new school charter application process that outlines a pre-application exploration period, application, initial review, departmental review, revisions, institutional review, final determination, notification letter sent to district in which proposed school intends to locate and MDE affidavit approval process. A screenshot confirms that the AAP and the Charter School Handbook (which include access to charter application materials) are accessible through links on the authorizer's website.
- Bethel's decisions and resulting actions are consistent across the portfolio of charter schools. According to the narrative and annual reports, the authorizer received two new school applications during the term of review. Both examples show that the authorizer required use of the new charter school application, then conducted an initial review, and provided feedback to the applicant. Review of the new school application for Oak Hill Montessori School shows that the applicant submitted a new school application, the authorizer conducted a preliminary review using the rubric and provided feedback to the applicant around areas that did not meet the standard. The applicant then had 30 days to make revisions and resubmit the application. In February 2020, the applicant formally withdrew its application and did not proceed with the authorization process at Bethel. Review of the new school application for Shiloh Academy shows that the applicant submitted a letter of intent followed by a new school application. The authorizer conducted an initial review using the assessment rubric. After receiving feedback from the authorizer highlighting the areas in which it did not meet the standard, the applicant did not continue with the application process.

- The authorizer’s decisions and resulting actions align with its AAP. Bethel’s AAP, which was approved by the commissioner in 2017, includes a link to the Bethel Charter Handbook that describes the process for applying to become a new charter school under Bethel University. The handbook also includes a link to the new charter school application, the rubric, the timeline and an explanation of the review process. Further, the Bethel Charter Handbook explains how charter applications are approved or denied. The handbook indicates that applications will be reviewed and assessed for appropriate capacity, and fiscal and human capital, to support the application. Additionally, it states that to be considered for institutional review, the application must meet 90 percent of all rubric items.
- The authorizer’s new charter school application and decision process aligns with nationally recognized quality authorizing standards. In alignment with NACSA Principle and Standard #2 (Application Process and Decision-Making), Bethel implements a charter application process that is open, well publicized, and transparent, and is organized around clear, realistic timelines. As noted above, Bethel’s application materials are available through its website, including the rubric by which applications will be evaluated and a clear timeline for each stage of the application process to be carried out. Additionally, Bethel’s new school application uses a multi-stage process in which applicants are provided information at each stage and are permitted to respond to that information during the process. As stated above, following the initial review of applications for Oak Hill Montessori School and Shiloh Academy, each applicant was provided with feedback in alignment with areas on the rubric that they did not meet, which they had an opportunity to revise and resubmit.
- The application and decision process reflects a clear strategy to promote high-quality charter schools. As previously described, the application is rigorous, as is the review rubric. With new school applications for Oak Hill Montessori School and Shiloh Academy, Bethel initially disapproved of each application, as neither met the 90 percent threshold to be moved to institutional review, and provided each applicant an opportunity to revise and resubmit the application.
- School representatives consistently verify the authorizer’s response to the guiding question. During the interview with charter school leaders, although none of the schools had completed a new school application during the review term, they explained that the process is intentionally rigorous to ensure that the school is a good fit for the portfolio and that Bethel is a good fit with the school. They described the process as “in-depth” and explained that all application resources can be found on the authorizer’s website.
- The authorizer decisions have resulted in high-quality charter schools. Over the term of the review, two of the three schools (or 67 percent) within Bethel’s portfolio have been identified as high-quality charter schools by MDE. This includes Hmong College Prep Academy (2018, 2019, 2020) and PACT Charter School (2020).
- Level 2 indicators were met for four years but not for the authorizer term to date. In June 2016, MDE placed Bethel in corrective action due to its MAPES performance rating of ‘Approaching Satisfactory,’ including a rating in B.1: New Charter School Decisions that fell below ‘Satisfactory.’ The authorizer exited corrective action February 2017. The commissioner approved Bethel’s AAP in March 2017.

Key Evidence:

- B.1 Narrative
- AAP
- Bethel Charter Handbook
- FY 2017 Annual Report – Bethel University
- FY 2018 Annual Report – Bethel University
- FY 2019 Annual Report – Bethel University
- FY 2020 Annual Report – Bethel University
- B1 Documentation
- New Charter Rubrics
- New School Example Oak Hill
- New School Example Shiloh
- Website Charter Authorizing
- 2017 High Quality Charter School List
- 2018 High Quality Charter School List
- 2019 High Quality Charter School List
- 2020 High Quality Charter School List
- 2021 High Quality Charter School List
- NACSA Principles and Standards 2018 Edition
- Charter school leader interview, March 29, 2021

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

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

Performance Level Rating: Level 3-Commendable

Finding: The authorizer has clear and comprehensive approval criteria and process standards to rigorously evaluate proposals of existing charter school expansion requests and other interim changes, and the authorizer's 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.

- The authorizer's application processes are comprehensive; include clear application questions and guidance; and include fair, transparent procedures and timelines and rigorous criteria. Bethel's Expansion Application (for grade level/site expansion and early learning programs) includes instructions and formatting guidelines. Additionally, it requires applicants to provide a detailed narrative highlighting the school's accomplishments over the past three years, a rationale for the school's expansion as well as an executive summary. Furthermore, the application provides metrics and measurements that the applicant must address in the following areas: general school information; overall academic and education program (academic accountability, assessment data, instructional leadership); overall fiscal management – budget and finance (audits, awards, budget, governance, reporting); governance and leadership (board oversight, compliance); and operations and legal compliance. It should be noted that the application for expansion for an Early Learning Program requires applicants to complete an additional section that includes provision of summaries of a comprehensive child assessment, intentional instructional practice, kindergarten transition, community-based services, staff ratios and licensure, teacher content knowledge, completion of early childhood screening, and early childhood health and developmental screening (if applicable). The Expansion Rubric has measures and metrics aligned with the four accountability categories listed above. Ratings are based on a three-level scale (goal not met, goal met with comment, goal met). The Bethel Charter Handbook includes clear guidance around the components of the application, as well as a timeline that includes a letter of intent, application submission, initial review, departmental review, revisions, institutional review, final determination and MDE affidavit approval process. Links to the application materials for grade level, site and early learning program expansion are included within the Bethel Charter Handbook, including the authorization chart, the expansion application, the supplemental affidavit cover sheet and the supplemental affidavit assurance and certification document. The Bethel Charter Handbook also explains the Change in Authorizer (CIA) process, which includes a letter of intent, submission of application (link embedded), initial review, departmental review, institutional review, and final determination. The application requires applicants to provide a summary for each measure (academic and educational program, fiscal management – budget and finances, governance and leadership, operations and legal compliance) and addresses the metrics, current status, and references the specific addendum items listed in the table. The CIA rubric shows that CIA applications are rated on a two-level scale (goal met or goal not met).

- The authorizer’s decisions and resulting actions are consistent across the portfolio of charter schools. The Bethel Charter Handbook includes links to a Ready to Open Task List and Ready to Open Site Visit resources, as well as resources to all the application materials needed for expansions and change in authorizer. According to the narrative and annual reports, in FY 2018, Bethel received an expansion application for Hmong College Prep Academy requesting a site and pre-kindergarten expansion. Review of the submitted application shows that it received an initial review and departmental review, in which it met all of the measures and metrics. In September 2017, the authorizer submitted a supplemental affidavit to MDE, which was initially declined by MDE. The authorizer revised and resubmitted the affidavit, which was approved by MDE in December 2017. As noted above, the Bethel Charter Handbook describes the change in authorizer process. The Change in Authorizer Application Example for Ridgeway Community School (FY 2021) confirms that Bethel followed its process as previously described, and that MDE approved the transfer on March 11, 2021. According to the letter from MDE notifying Bethel of the change in authorizer approval, MDE notes that the charter contract must be finalized and executed no later than July 1, 2021.
- Bethel’s decisions and resulting actions align with its AAP. The AAP provides links to the Bethel Charter Handbook, which includes the guidelines, rubrics and decision-making process, as well as applications for site/grade level expansion and early learning program expansion, the change in authorizer application, and ready to open task list and site visit documents.
- Bethel’s interim accountability processes align with nationally recognized quality authorizing standards. In alignment with NACSA Principle and Standard #2 (Application Process and Decision-Making), Bethel implements expansion and change in authorizer application processes that are open, well publicized and transparent, and are organized around clear, realistic timelines. As noted above, Bethel’s application materials are available through their website, including the rubric by which applications will be evaluated and a clear timeline for each stage of the application process to be carried out. Bethel establishes distinct requirements and criteria for applicants who are existing school operators, including site visits, as they seek to expand or change authorizers. Using its rubrics, Bethel rigorously evaluates applications through review of the written proposal and due diligence in examining the applicant’s experience and capacity.
- Interim accountability processes reflect a clear strategy to promote high-quality charter schools. The Bethel Charter Handbook clearly states that schools applying for expansion must demonstrate a record of strong academic success, fiscal responsibility and a significant and justifiable need. As previously described, both the application process and rubric are rigorous and include opportunities for the applicant to revise and resubmit if they have not met the threshold to move to institutional review. Only applications that meet the 90 percent threshold of standards will move to institutional review.
- School representatives consistently verify the authorizer’s response to the guiding question. During the interview with charter school leaders, participants indicated that all resources related to expansion are available through the authorizer’s website or through the Bethel Charter Handbook. They noted that schools that are interested in expanding may work closely with the Partnerships Coordinator to get guidance on necessary documents and requirements, especially as they relate to the submission of documentation to MDE.
- The authorizer’s decisions have resulted in high-quality charter schools. Over the term of the review, two of the three schools (or 67 percent) within Bethel’s portfolio have been identified as high-quality charter schools by MDE. This includes Hmong College Prep Academy (2018, 2019, 2020) and PACT Charter School (2020).
- Level 2 indicators were met for four years but not for the authorizer term to date. In June 2016, MDE placed Bethel in corrective action due to its MAPES performance rating of ‘Approaching Satisfactory’, including a rating in B.2: Interim Accountability Decisions that fell below ‘Satisfactory’. The authorizer exited corrective action in February 2017. The commissioner approved Bethel’s AAP in March 2017.

Key Evidence:

- B.2 Narrative
- AAP
- FY 2017 Annual Report – Bethel University
- FY 2018 Annual Report – Bethel University
- FY 2019 Annual Report – Bethel University
- FY 2020 Annual Report – Bethel University
- Bethel Charter Handbook
- Expansion Application
- Expansion Rubric
- CIA Rubric
- FY21 CIA redline
- B2 Screenshot CIA
- B2 Screenshot Early Learning
- B2 Screenshot Expansion
- Ready to Open Task List
- Ready to Open Site Visit
- CIA Example Ridgeway
- 21.03-11 BU-RCS CIA Request Review Rubric
- 21.03-11 MDE to BU for RCS CIA Request - Approval
- 2017 High Quality Charter School List
- 2018 High Quality Charter School List
- 2019 High Quality Charter School List
- 2020 High Quality Charter School List
- 2021 High Quality Charter School List
- NACSA Principles and Standards 2018 Edition
- Charter school leader interview, March 29, 2021

B.3 Measure: Contract Term, Negotiation and Execution

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

Performance Level Rating: Level 4-Exemplary

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

- Contracts in the authorizer’s portfolio of charter schools meet current statutory requirements. According to MDE, 100 percent of the renewal contracts met statutory requirements. At the time of the review, there were no contracts for new charter schools, change in authorizer, or merger schools.
- Contracts clearly state the rights and responsibilities of the school and the authorizer. Review of the authorizer’s contract with its authorized schools shows that rights and responsibilities are clearly outlined, including Article IV (limitations on actions, other permitted activities), Article V Legal Status of the School (nonprofit status, articles of incorporation, bylaws), and Article VI Operating Requirements. For example, Section 6.1 Governance explicitly outlines that the school board is responsible for matters related to the operation of the school including, but not limited to, budgeting, curriculum, programming, personnel and operating procedures. Additionally, Article III outlines the role of Bethel and describes its oversight responsibilities as an authorizer. According to the narrative, the contract was revised to update the rights and responsibilities section in 2018 and 2020.
- Bethel’s contracting practices are consistent across the authorizer’s portfolio of charter schools. Contracts for Hmong College Prep Academy, Northwest Passage High School, and PACT Charter School confirm that contracts are consistent across the portfolio. For example, the authorizer uses a standard contract template to define the material terms and rights and responsibilities of the school and authorizer.
- Contracts were executed no later than the first day of the renewal period. According to MDE, Bethel submitted 100 percent of its renewal contracts prior to the first day of the renewal period.
- Bethel executes contract amendments for material changes to current school plans when necessary and not in lieu of conducting renewal evaluations. According to the narrative, the authorizer amended contracts to reflect feedback that it received from MDE, specifically to Article IX Amendments. Review of amended contracts confirms that the contracts were amended to reflect these language changes and not in lieu of renewal evaluations. Renewal application documents confirm that the authorizer conducted separate renewal evaluations.
- Level 2 indicators were met for the authorizer term to date. Review of contracts for Hmong College Prep, PACT Charter School and Northwest Passage High School confirms that the authorizer’s contracts have clearly stated the rights and responsibilities of the school and authorizer over the term of the review and that Bethel’s contracting practices have remained consistent across the portfolio of charter schools as it relates to the material terms and rights and responsibilities of authorizer and school.

- School representatives consistently verify the authorizer’s response to the guiding question. During the interview with charter school leaders, participants described how the contracting process has become more transparent and purposeful over the review term. They described how Bethel’s contract clearly outlines the responsibilities of the school versus the authorizer, and also how the contracting process is collaborative between the authorizer and its schools. Furthermore, they discussed how contracts have been amended to reflect language based on feedback from MDE. This confirms what participants in the authorizer interview explained, which is that Bethel uses the contracting process to outline the expectations for both parties, and that they have worked to clarify roles and responsibilities.

Key Evidence:

- B.3 Narrative
- AAP
- 20.12-22 Amended HCPA 2020 BU CONTRACT
- 18.07-18 Bethel-NWPHS CHARTER SCHOOL CONTRACT
- 20.12-22 Amended NWPHS 2020 Bethel University CHARTER SCHOOL CONTRACT
- 17.12-14 PACT Charter Contract Amendment
- 20.12-22 Amended PACT 2020 Bethel University CHARTER SCHOOL CONTRACT (1)
- MAPES Compliance Data Spreadsheet – Bethel University
- Authorizer interview, March 29, 2021
- Charter school leader interview, March 29, 2021

B.4 Measure: Performance Outcomes and Standards

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

Performance Level Rating: Level 1-Approaching Satisfactory

Finding: The authorizer has mechanisms in place to hold the charter schools in its portfolio accountable to performance outcomes; however, it does not consistently execute contracts with clear, measurable and attainable performance standards in the areas of academics, operations and finance.

- The contracts in the authorizer’s portfolio of charter schools meet current statutory performance standards. Review of MDE contract review rubrics for Hmong College Prep Academy, Northwest Passage High School and PACT Charter School confirm that the three contracts met statutory compliance based on MDE’s review.
- Not all contracts define clear, measurable and attainable academic, financial and operational performance outcomes and standards. Although the contracts with the three schools within Bethel’s portfolio each include academic and non-academic goals (Exhibit F), the goals are not consistently written or else they are missing. For example, the contract with Northwest Passage High School includes goals for academic, financial and operational performance. A financial goal is that the school will receive a clean audit annually and an operational goal is that the school will have an average Epicenter score of 95 percent based on accuracy, completion and on-time submissions. These goals are measurable and attainable. However, the school’s academic goal that “70 [percent] of students testing below grade level in the fall will show one year of growth of three testing periods” does not include information about the assessment used to measure the goal. In contrast, the contract with PACT Charter School defines clear, measurable goals for academic, financial, and operational performance. For example, one of the school’s academic goals is: “At least 65 [percent] of students that take the fall NWEA MAP assessment at PACT will meet their MAP growth targets, as measured from fall to winter administration in grades 3-11, as measured from fall to spring administration.” PACT’s contract also includes a financial goal: “PACT will receive the MDE Finance Award for FY20, FY21 and FY22,” and an operational goal: “PACT will average 95 [percent] based on accuracy, completion and on-time submission in Epicenter.” Although Hmong College Prep Academy’s contract includes both academic and operational performance goals that are clear and measurable, the contract does not include a financial performance goal. Exhibit F of the Hmong College Prep Academy contract has a section for Finance and Operations; however, the goal is purely related to operations and does not address financial performance. Specifically, it states that the school will “ensure operational and legal compliance via 90 [percent] accuracy, completion and on-time submissions to Epicenter.” When asked about the missing financial goal during the authorizer interview, participants explained that Hmong College Prep Academy’s contract expired in 2020 and that the goals had been drafted prior to the hiring of the Partnerships Coordinator. Yet according to MDE, the authorizer submitted a renewal contract for the school in June 2020. Review of this most recent contract revealed that it did not include financial goals.
- Contracts include language around interventions and corrective action in the event that schools should show indications of weak performance or fail to meet performance targets. Article X, Section 10.1 Grounds for Revocation/Termination or Nonrenewal states that the contract may be revoked/terminated and need not be renewed by Bethel upon determination that the following has occurred: 1) failure of the school to demonstrate satisfactory achievement for all students including the requirements for student performance set forth in the contract; 2) failure of the school to meet generally accepted standards of fiscal management; or 3) failure of the school to comply with applicable laws. Further, each contract defines clear metrics that will lead to intervention and the resulting corrective action.

- Performance outcomes and standards are not consistent across the portfolio of charter schools. As described above, the performance outcomes on contracts between Bethel and the charter schools that it authorizes are not consistent. For example, the 2020 renewal contract for Hmong College Prep Academy does not include a financial performance goal and the academic goal for Northwest Passage High School does not include information about how the goal will be measured (unlike academic goals for PACT Charter School and Hmong College Prep Academy). Participants in both the authorizer interview and charter school leader interview described how, based on feedback from MDE, the authorizer and charter schools have been working on writing performance goals over the term of the review, although they noted that this is still an area for growth. Specifically, charter school leaders described how they have worked collaboratively with the authorizer to create goals around academics, finance, governance and compliance. They explained that having goals be well-articulated with specific requirements has enhanced overall authorizing and provided clarity for schools around performance expectations.
- Contracts align with the performance standards of its AAP. Bethel's AAP includes a link to the Bethel University Charter School Contract and describes the performance rubrics that make reference to alignment of contracts with Minnesota law. Additionally, the AAP states that the performance frameworks address specific academic, operational and financial performance standards. In addition to citing Minnesota Statutes around improving all pupil learning and all student achievement as the most important factor in determining contract renewal, the AAP also notes that the contract language directs attention to the primary and additional purposes of charter schools.
- The authorizer holds charter schools accountable to academic, financial and operational performance outcomes and standards defined in the contract. Bethel's Renewal Assessment Rubric (linked in the AAP and Bethel Charter Handbook) shows that schools are evaluated on their overall academic performance and educational program, fiscal management – budget and finance, governance and leadership, and operations and legal compliance.

Key Evidence:

- B.4 Narrative
- AAP
- Bethel Charter Handbook
- 20.12-22 Amended HCPA 2020 BU CONTRACT
- 20.12-22 Amended NWPHS 2020 Bethel University CHARTER SCHOOL CONTRACT
- 20.12-22 Amended PACT 2020 Bethel University CHARTER SCHOOL CONTRACT (1)
- 20.12-29 Bethel-HCPA Revised Renewal Contract Review Rubric
- 20.12-29 Bethel-NW Passage Revised Renewal Contract Review Rubric
- 20.12-23 Bethel-PACT Renewal Contract Review Rubric
- Renewal Assessment Rubric
- Authorizer interview, March 29, 2021
- Charter school leader interview, March 29, 2021

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

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

Performance Level Rating: Level 3-Commendable

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

- The authorizer has clear processes for oversight and monitoring. The Bethel Charter Handbook and contracts describe the responsibility of the authorizer to hold schools accountable. The handbook and contracts explain that the authorizer uses documents, such as charter contracts, annual reports, annual audits, and state academic assessments to measure the success of its authorized charter schools. The authorizer also uses school-specific measures such as affective student development, positive graduation rates, projects, individual student goals, or workforce engagement. The Bethel Charter Handbook indicates that the authorizer will conduct an annual site visit, ongoing monitoring site visits, and a renewal site visit. As described above, in its contracts with its portfolio of schools, Bethel includes specific language about how it will conduct academic, financial and operational oversight of the charter schools, including through school submission of financial and other compliance documents, site visits and a comparative review of results from a government-required assessment.
- Bethel conducts charter oversight that competently evaluates academic, financial and operational performance and monitors compliance with applicable law. The FY17-21 Annual Site Visit Planner shows that the authorizer conducted site visits for its three schools in FY 2018, FY 2019, and FY 2020. Further, documentation shows that the authorizer had scheduled virtual site visits for PACT Charter School (October 2020), Northwest Passage High School (November 2020), and Hmong College Prep Academy (November 2020). Review of FY17-21 Oversight Example HCPA confirms that the authorizer conducted oversight activities through the use of performance frameworks (assessment rubrics) and performance reviews (site visits) including annual site visits, an evaluation by the site visit team using the assessment rubric, and the provision of written feedback as confirmed by board meeting agendas and minutes. Completed assessment rubrics show that the reviewers gathered evidence for metrics and measures and rated them on a scale of goal not met, goal met with conditions, or goal met. For example, meeting minutes confirm that representatives from the authorizer presented a review of the site visit findings to the school during July 2017, January 2018, and February 2019 governing board meetings. The FY17-21 Oversight Example HCPA also shows that, in areas where the school met the goal 'with comment', the report included additional guidance for improvement. For example, in the FY 2017 report, the school earned a rating of 'goal met with comment' for indicator A.4 (School Culture: Other measures of success determined by the schools). The authorizer included an aligned comment stating, "One area of improvement is to include more analysis of data for reports that provide highlights for stakeholders."
- The authorizer's oversight activities align with its stated oversight and monitoring processes in its AAP. Bethel's AAP outlines the oversight criteria, processes and procedures it will use to monitor and evaluate the fiscal, operational and academic performance of its schools and align them with state statute. The AAP includes links to the Bethel Charter Handbook, the Charter Annual Assessment Rubric and its charter school contract template, all of which outline Bethel's oversight and monitoring processes as described above.

- Bethel’s oversight and monitoring practices are consistent across the portfolio of charter schools. Review of oversight documents for Hmong College Prep Academy show that between FY 2017 and FY 2020, the authorizer used the annual assessment rubric to evaluate the school’s performance in areas of academic, finance and operation. As stated above, and as confirmed in the authorizer’s annual reports, the FY17-21 Annual Site Visit Planner shows that the three schools received annual site visits. Furthermore, screenshots of the authorizer’s Epicenter dashboard confirm that it collects the submission of compliance items for its three schools and tracks whether these documents were submitted on time, as well as whether they are accurate and complete.
- Bethel’s oversight processes align with nationally recognized quality authorizing standards. Bethel’s oversight and monitoring processes align with NACSA’s Principles and Standards #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, revocation and intervention decisions. This system is clearly defined and communicated to schools in the Bethel Charter Handbook and in individual contracts with charter schools. Furthermore, letters and agendas from charter school leader meetings show that the authorizer communicates information regarding the annual site visits to schools. As indicated above, Bethel evaluates each school annually on its performance and progress toward meeting the standards and targets stated in the charter contract, including essential compliance requirements, and clearly communicates evaluation results to the school’s governing board and leadership. Although, as previously noted, the contract for Hmong College Prep did not include a specific financial goal, Epicenter screenshots and annual site visit documents confirm that the school underwent the same oversight process as the other schools in Bethel’s portfolio, including submission of financial statements and budgets. Finally, as shown in Bethel’s contracts with its schools, the authorizer requires and reviews annual financial audits of schools, which are conducted by an independent auditor.
- The authorizer’s processes for ongoing oversight of the portfolio of charter schools reflect a clear strategy to promote high-quality charter schools. Bethel’s consistent implementation of its oversight processes, including regular submission of compliance documents into Epicenter, annual site visits and the Partnerships Coordinator’s attendance at school board meetings confirm that the authorizer is monitoring its schools to ensure that they meet their goals. The Bethel Charter Handbook and contracts describe intervention and corrective action to be taken in the event that schools are not making adequate progress. The processes, standards and tools described in the handbook are clear, well-defined and, according to charter school leaders during interviews, consistently implemented.
- School representatives consistently verify the authorizer’s response to the guiding question. During the interview with charter school leaders, participants verified that the authorizer conducts annual site visits, during which a representative comes to the school, observes classroom teachers and interviews school stakeholders (i.e., school board members, administrators, students). They explained that the authorizer reviews the school’s goals annually to ensure that the school is meeting them. Moreover, they described that schools submit documents (e.g., board meeting minutes, agendas, financial documents, professional development plans, World’s Best Workforce data, annual reports) through Epicenter. Participants also stated that following site visits, the authorizer shares information about the standards the school met or did not meet.
- The authorizer’s decisions have resulted in high-quality charter schools. Over the term of the review, two of the three schools (or 67 percent) within Bethel’s portfolio have been identified as high-quality charter schools by MDE. This includes Hmong College Prep Academy (2018, 2019, 2020) and PACT Charter School (2020).
- Level 2 indicators were met for four years but not for the authorizer term to date. In June 2016, MDE placed Bethel in corrective action due to its MAPES performance rating of ‘Approaching Satisfactory,’ including a rating in B.5: Authorizer’s Processes for Ongoing Oversight of the Portfolio of Charter Schools that fell below ‘Satisfactory.’ The authorizer exited corrective action in February 2017. The commissioner approved Bethel’s AAP in March 2017.

Key Evidence:

- B.5 Narrative
- AAP
- Bethel Charter Handbook
- FY 2017 Annual Report – Bethel University
- FY 2018 Annual Report – Bethel University
- FY 2019 Annual Report – Bethel University
- FY 2020 Annual Report – Bethel University
- FY17-21 Annual Site Visit Planner
- FY17-21 Oversight Example HCPA
- FY21 Virtual Site Visit Overview
- MDE Charter Reporting Calendars
- MDE District Reporting Calendars
- A3 Epicenter and G-Suite Evidence
- 2017 High Quality Charter School List
- 2018 High Quality Charter School List
- 2019 High Quality Charter School List
- 2020 High Quality Charter School List
- 2021 High Quality Charter School List
- NACSA Principles and Standards 2018 Edition
- Charter school leader interview, March 29, 2021

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

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

Performance Level Rating: Level 4-Exemplary

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

- Bethel implements clear and comprehensive standards and processes to address complaints, intervention and corrective action. The authorizer has a clear process to address complaints, which includes: written submission of complaint that identifies the complainant and provides a method of contact; statement that the authorizer will conduct reasonable inquiry; if inquiry provides sufficient evidence to establish alleged violation of law or fiscal mismanagement, the authorizer will notify the school and require action as necessary (striving for a response within 30 days). Review of a complaint submitted to MDE regarding Hmong College Prep Academy confirms that the authorizer implemented its standards and processes. After Bethel was notified of the complaint by MDE in July 2019, it contacted the school to indicate that, in alignment with the Bethel Charter Handbook, it would gather information “for the purpose of verifying whether the allegations provide sufficient evidence to establish the alleged violation(s).” After an inquiry, which was summarized in a letter to MDE in August 2019, the authorizer determined that “there do not appear to be any violations with regard to the issues listed in the complaint.” The authorizer also has clear standards and processes to address intervention and corrective action. As previously noted, both the Bethel Charter Handbook and individual contracts with charter schools outline interventions and corresponding actions that may be taken. The chart shows five levels of intervention (1=notice of concern; 2=notice of deficiency, 3=notice of probationary status, 4=charter review, 5=charter revocation). Each level is clearly defined and associated with metrics and actions. For example, signs of weak performance (level 1) lead to a letter from Bethel, a review and reconsideration of goals, and follow up within one year on the area of concern. In contrast, an extended pattern of failure to comply or to meet performance targets (level 4) may lead to recommendation to revoke and a decision to commence or not commence revocation proceedings made by Bethel.
- The authorizer's decisions and resulting actions are consistent across the portfolio of charter schools and align with its stated standards and processes in its AAP. Bethel's AAP includes a link to the Bethel Charter Handbook that includes the processes by which complaints will be addressed (as described above) and the intervention and corrective action table that clearly describes the levels of intervention with corresponding actions that may be taken by Bethel. As described above, the authorizer followed its complaint policy when a complaint was submitted to MDE regarding Hmong College Prep. As discussed below, the authorizer intervened and implemented a corrective action plan when PACT Charter School did not meet its annual goals in a number of identified areas.

- Decisions made regarding complaints, intervention and corrective action are aligned with data generated under oversight and monitoring practices. According to the FY17-21 Record of Complaints documents, over the term of the review, Bethel received only two complaints. One was in FY 2020 for Hmong College Prep Academy as described above. Another was for PACT Charter School in FY 2019, which did not rise to the level of the authorizer taking action. According to the narrative, over the review term, only one school was at a level two and received intervention and corrective action. FY17-21 Contract Example PACT includes an improvement plan in the areas of academic governance (goal setting), school culture, assessment, budget forecast, enrollment, fund balance, leadership (development and planning), leadership (board of directors), leadership (administrative support), and operations. The areas identified in the improvement plan are directly aligned with the authorizer's annual assessment rubric. Each area for improvement includes clear goals and a completion timeline (i.e., completion data, person responsible, task).
- Bethel's standards and processes align with nationally recognized quality authorizing standards. Bethel's intervention and corrective action processes are aligned with NACSA's Principles and Standards #4 (Ongoing Oversight and Evaluation). Specifically, through the Bethel Charter Handbook and its contracts with charter schools, Bethel establishes and makes known to schools an intervention policy that states the general conditions that may trigger intervention and the types of actions and consequences that may ensue. Bethel allows schools reasonable time and opportunity for remediation in non-emergency situations (e.g., using the annual site visit to gauge progress).
- School representatives consistently verify the authorizer's response to the guiding question. During the interview with charter school leaders, participants explained that if there are complaints, the authorizer communicates with the school. They noted that the authorizer follows up on complaints and provides feedback when appropriate. They also stated that the authorizer is very clear about its role when a complaint arises. Participants also explained that intervention and corrective actions are described in the Bethel Charter Handbook and included within each of their contracts with Bethel.

Key Evidence:

- B.6 Narrative
- AAP
- Bethel Charter Handbook
- FY 2017 Annual Report – Bethel University
- FY 2018 Annual Report – Bethel University
- FY 2019 Annual Report – Bethel University
- FY 2020 Annual Report – Bethel University
- FY17-21 Complaint Example HCPA
- FY17-21 Record of Complaints
- FY17-21 Contract Example PACT
- NACSA Principles and Standards 2018 Edition
- Charter school leader interview, March 29, 2021

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.

- Support and technical assistance are proactive. Documents show (and annual reports confirm) that the authorizer provides technical assistance through charter school meetings, quarterly newsletters, memos and emails. For example, agendas show that the authorizer holds annual charter school meetings during which it reviews best practices and provides a forum for collaboration between school leaders. A memo in May 2020 discussed legal updates and an email in July 2019 from Bethel to charter leaders provided resources tied to the renewal process. The Renewal Tech Asst document shows how the school shared renewal information and a draft application with schools in anticipation of their renewal applications.
- Support and technical assistance are provided in a variety of areas. Quarterly newsletters from Bethel to school leaders include book recommendations, applicable resources and lists of upcoming events. For example, in Spring 2018, Bethel shared a resource from the National Charter School Resource Center entitled “A User Guide to Fiscal Oversight: A Toolkit for Charter School Governing Boards” and in Winter 2019 the authorizer shared a resource entitled: “Charter Board Partners: Governance Best Practices for Highly Effective Charter School Boards.” Meeting agendas show that the authorizer reviewed a variety of topics. For example, the main topic of the February 2017 meeting focused on Charter Authorizing Program (overview and changes) and an Epicenter overview. In November 2017, the meeting focus was Charter Authorizing Program (innovation and problems of practice). In November 2018, the focus of the meeting was on Charter Authorizing (renewal and continuous improvement), and the authorizer invited a guest speaker to discuss board development and training. In August 2018 and 2019 the meetings focused on sharing best practices. In February 2020, the authorizer invited a guest speaker, “Incubate to Innovate,” whose presentation focused on innovative thinking. Finally, in September 2020, the authorizer organized a book discussion around culturally responsive teaching and provided a forum in which to share best practices around virtual site visits.
- Support and technical assistance are provided in a manner to preserve school autonomy. Although Bethel’s contracts state that the school “agrees to attend and participate in the Annual Meeting of Bethel Authorized Charters,” when asked about this expectation, participants in the charter school leadership interview stated that the annual meetings are beneficial and that they do not interpret this as an infringement on their autonomy. Moreover, they stated that the meetings are intentionally organized to facilitate the sharing of best practices. Contract language confirms this, stating, “the goal of participation is to share information and identify resources.”
- Support and technical assistance are provided in a manner that is consistent across the portfolio of charter schools. Review of emails and memos indicates that Bethel shares technical assistance resources with all the schools in its portfolio. Moreover, all contracts include the stipulation that they will attend the annual meeting.

- Support and technical assistance are regularly offered, based on demonstrated need, and designed to prevent problems. As noted above, the authorizer holds an annual meeting of its schools, in addition to sharing quarterly newsletters and providing ongoing assistance on an as-needed basis (e.g., renewal resources, legal updates). Additionally, a July 2019 email to schools refers back to the Charter Leadership FY20 Planning Google Form soliciting feedback from leaders, demonstrating that the authorizer is responsive to needs highlighted by its authorized schools. During the authorizer interview, participants explained that, when reviewing a change in authorizer application (Ridgeway), they identified an area of need around improving their policies. As a result, the authorizer shared resources with the school.
- Support and technical assistance are designed to promote high-quality charter schools. During the authorizer interview, participants described the ways in which technical assistance is designed to have schools share best practices with each other. They also explained (and emails and MACSA agendas confirm) how the authorizer seeks best practices from outside entities (e.g., books, resources, speakers) to help foster shared learning and access to research-based practices. Participants discussed the engagement of an outside financial consultant to create a resource for schools to better track their finances and ensure that they are financially sound. Participants noted (and review of the resource confirmed) that, although it has been designed, the tool has not yet been shared with schools.

Key Evidence:

- B.7 Narrative
- AAP
- FY 2017 Annual Report – Bethel University
- FY 2018 Annual Report – Bethel University
- FY 2019 Annual Report – Bethel University
- FY 2020 Annual Report – Bethel University
- FY17-21 Charter Newsletters
- B7 2020 Renewal Tech Asst
- Board MEMO re Open Meetings
- FY17-21 Meetings with Charter Leaders
- Mail_Charter Newsletter
- B7 Technical Assistance
- A4 TAG training and tool
- Authorizer interview, March 29, 2021

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

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

Performance Level Rating: Level 3-Commendable

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

- There is an intentional plan for the dissemination of best practices and models or practices have been identified. The Bethel Charter Handbook specifies that the authorizer intends to actively participate in the broader charter community and will share best practices with schools through the annual leadership meeting. It explains that one purpose of this meeting is to discuss best practices and model replication of high performing charter schools. Charter school meeting agendas from August 2018 and 2019 and September 2020 confirm that the authorizer used the forum to have school leaders share best practices with each other. Additionally, the authorizer held a “best practices” brunch in which school leaders were invited to participate. Finally, emails show that charter schools in Bethel’s portfolio have been invited to participate in best practices events hosted by other Minnesota-based providers.
- One or more of the identified practices is moving toward dissemination. As previously described, Bethel collaborated with another Minnesota-based authorizer to create and share a self-evaluation tool for schools to use in assessing their experience with distance learning in the spring of 2020. This was in preparation for the reopening of schools in the fall. An email from June 8, 2020, and a copy of the presentation confirm that Bethel shared the Distance Learning Plans Charter School Self-Evaluation and Reflection with charter school leaders; however, there is no documented evidence to confirm whether any of the schools adopted the disseminated practices.
- There is no documented evidence to demonstrate that one or more identified models/practices have been realized at or disseminated to one of more schools beyond the original.

Key Evidence:

- B.8 Narrative
- AAP
- Bethel Charter Handbook
- FY 2017 Annual Report – Bethel University
- FY 2018 Annual Report – Bethel University
- FY 2019 Annual Report – Bethel University
- FY 2020 Annual Report – Bethel University
- FY17-21 Meetings with Charter Leaders
- Mail_OW Leaders Retreat Update
- Mail_Re_school speaker
- A10 Documentation

B.9 Measure: Charter School Renewal and Termination Decisions

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

Performance Level Rating: Level 3-Commendable

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

- Bethel 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 to terminate charters when necessary to protect student and public interests. Schools applying for renewal must submit a letter of intent and an application. The application undergoes an initial review, a departmental review (which may solicit revisions from the applicant), and an institutional review before the authorizer makes its final determination. The application requires applicants to provide a brief narrative highlighting the school’s accomplishments over the contract period and a rationale for why the school should be renewed. The application provides measures and metrics that must be addressed in the areas of academic and educational program, fiscal management – budget and finance, governance and leadership, and operational and legal compliance. Additionally, it asks schools to reflect on areas of growth. As previously described, Bethel has a Renewal Assessment Rubric that the authorizer uses to evaluate the application. The rubric includes the measures and metrics (aligned with the application), evidence and comments, and states whether or not the goals were met. According to the Bethel Charter Handbook, Bethel conducts a renewal site visit (in lieu of the annual site visit) at least six months prior to the end of the school’s contract term. The Bethel Charter Handbook includes renewal guidelines that outline how the authorizer will determine the term of the contract. For example, schools that have successfully demonstrated improvements in all pupil learning and all student achievement and that have shown successful performance in the areas of fiscal management, governance and leadership, operational and legal compliance will earn a five-year renewal term. In contrast, a school that fails to meet multiple performance targets, that repeatedly fails to meet a single performance target or that fails to comply with applicable law or significantly fails to comply with the conditions of the charter, will earn a three-year renewal. It should be noted that the authorizer’s handbook states that “student achievement is the most important factor in determining contract renewal and will be based substantially on the school’s attainment of its contract academic outcomes and goals.”
- The authorizer’s decisions and resulting actions are consistent across its portfolio of charter schools. According to MDE, and as renewal contracts confirm, the three schools in Bethel’s portfolio applied for renewal and were renewed over the term of the review. One school, Hmong College Prep Academy, received a five-year renewal, having met 100 percent of the academic and non-academic goals as measured by the Renewal Assessment Rubric. PACT Charter School and Northwest Passage High School each received three-year contract renewals due to not fully meeting all academic and non-academic goals. For example, PACT Charter School met 50 percent of the goals and Northwest Passage High School met 40 percent of the goals.
- Bethel’s decisions and resulting actions align with its AAP. Bethel’s AAP provides links to renewal resources, including the Bethel Charter Handbook, which clearly outlines the process and standards for renewal, the renewal application and the renewal assessment rubric. Furthermore, the AAP provides a link to a resource describing how charter applications are approved or denied.

- Bethel’s renewal standards and processes align with nationally recognized quality authorizing standards. In alignment with NACSA Principle and Standard #5 (Revocation and Renewal Decision-Making), Bethel bases the renewal process and renewal decisions on a thorough analysis of a comprehensive body of objective evidence defined by the performance framework in the charter contract; grants renewals only to those schools that have achieved the standards and targets in alignment with its renewal guidance, have demonstrated that they are organizationally and fiscally viable, and have been faithful to the terms of the contract and applicable law. Bethel clearly communicates to schools the criteria for charter revocation, renewal and non-renewal decisions that are consistent with the charter contract. Although the authorizer has not closed any schools, the Bethel Charter Handbook includes a detailed closure protocol that ensures timely notification to parents, an orderly transition of students and student records to new schools, and the disposition of school funds, property, and assets in accordance with law.
- The authorizer’s renewal standards and processes reflect a clear strategy to promote high-quality charter schools. Bethel’s renewal application and accompanying renewal assessment rubric are rigorous. Moreover, the authorizer has defined guidance around how it determines renewal contract terms in order to ensure high-quality charter schools that are academically successful, fiscally viable and organizationally and legally compliant. It should be noted that, although PACT Charter School was identified by MDE as a high-quality charter school, Bethel provided a three-year renewal contract to the school based on its inconsistent performance over the term of the contract.
- The authorizer’s decisions have resulted in high-quality charter schools. Over the term of the review, two of the three schools (or 67 percent) within Bethel’s portfolio have been identified as high-quality charter schools by MDE. This includes Hmong College Prep Academy (2018, 2019, 2020) and PACT Charter School (2020).
- School representatives consistently verify the authorizer’s response to the guiding question. During the interview with charter school leaders, participants consistently described the renewal process, including a letter of intent, the submission of documentation in alignment with key areas, and a renewal site visit. They explained that the renewal process, and specifically the creation of future performance goals, is a collaboration between the authorizer and the school. Participants stated that the renewal process begins approximately one year prior to the end of the current contract term and that there is a clear schedule and timeline that provides sufficient opportunity to fulfill the requirements.
- Level 2 indicators were met for four years but not for the authorizer term to date. In June 2016, MDE placed Bethel in corrective action due to its MAPES performance rating of ‘Approaching Satisfactory,’ including a rating in B.9: Charter School Renewal or Termination that fell below ‘Satisfactory.’ The authorizer exited corrective action in February 2017. The commissioner approved Bethel’s AAP in March 2017.

Key Evidence:

- B.9 Narrative
- AAP
- Bethel Charter Handbook
- FY 2017 Annual Report – Bethel University
- FY 2018 Annual Report – Bethel University
- FY 2019 Annual Report – Bethel University
- FY 2020 Annual Report – Bethel University
- B9 Renewal Screenshot
- Renewal Application
- Renewal Overview Board Meetings
- 2017 High Quality Charter School List
- 2018 High Quality Charter School List
- 2019 High Quality Charter School List
- 2020 High Quality Charter School List
- 2021 High Quality Charter School List
- NACSA Principles and Standards 2018 Edition
- Authorizer interview, March 29, 2021
- Charter school leader interview, March 29, 2021

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

MAPES Performance Measures B Rating for Bethel University is 2.90.

Performance Measures B: Rating Drivers

- The authorizer has clear standards and processes for its new school, expansion, change in authorizer and renewal applications, and it implements these standards and processes consistently. The processes are rigorous and the decision-making transparent.
- The authorizer's contracts define the material terms and rights and responsibilities of the school and authorizer. The contract language is consistent across Bethel's portfolio of schools.
- The authorizer has clear systems in place to address complaints in a timely and transparent manner. Moreover, they have transparent processes in place around intervention and corrective action.
- The authorizer supports its schools through proactive, regular and intentional technical assistance that aligns with their mission, and also promotes the sharing of best practices.

Performance Measures B: Recommendations

- In school contracts, ensure that all contracts include academic, financial and operational goals written in ways that are specific, measurable, achievable, realistic and timebound.

Appendix A: Authorizer Portfolio Information

Operational Schools: Hmong College Prep Academy, Northwest Passage High School, PACT Charter School

Preoperational Schools: N/A

Closed Schools: N/A

Never Opened Schools: N/A

Schools that have transferred into portfolio: N/A

Schools that have transferred out of portfolio: N/A

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

Appendix B: Evaluation Methodology

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

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

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