

Minnesota Authorizer Performance Evaluation System (MAPES) Performance Report

Authorizer Information

Authorizer: Pillsbury United Communities

Authorizer Type: Charitable Organization

Evaluation Period: January 2016 – December 2020

Report Issue Date: December 7, 2020

Characteristics of the Authorizer

- Pillsbury United Communities – Office of Public Charter Schools (PUC) is an authorizer whose mission is to authorize schools that offer innovative, challenging, authentic and equitable learning opportunities to students who have not been successful in traditional learning settings or who have been underserved educationally.
- The authorizer has been a partner and resource within Minnesota and nationally around turnaround practices and providing underserved students with innovative access entries to education. This work aligns with PUC’s broader mission to be community builders who co-create enduring change toward a just society.
- PUC’s portfolio includes 20 operational schools and one that is pre-operational. The schools are located throughout the state of Minnesota, including in urban and rural areas.

Overall Performance Rating

MAPES Overall Performance Rating for Pillsbury United Communities is 1.38: Approaching Satisfactory

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

A.1: Authorizing Mission (2.5 percent)*	1
A.2: Authorizer Organizational Goals (1.25 percent)**	1
A.3: Authorizer Structure of Operations (2.5 percent)	2
A.4: Authorizing Staff Expertise (2.5 percent)	3
A.5: Authorizer Knowledge and Skill Development of Authorizing Leadership and Staff (2.5 percent)**	1
A.6: Authorizer Operational Budget for Authorizing the Portfolio of Charter Schools (2.5 percent)	1
A.7: Authorizer Operational Conflicts of Interest (2.5 percent)	1
A.8: Ensuring Autonomy of the Charter Schools in the Portfolio (2.5 percent)	3
A.9: Authorizer Self-Evaluation of Capacity, Infrastructure and Practices (1.25 percent)**	1
A.10: Authorizer High-Quality Authorizing Dissemination (1.25 percent)**	3
A.11: Authorizer Compliance to Responsibilities Stated in Statute (3.75 percent)	3
Total Performance Measures A Rating:	1.90

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

B.1: New Charter School Decisions (11.25 percent)*	1
B.2: Interim Accountability Decisions (11.25 percent: 3.75 percent for expansion requests; 3.75 percent for ready to open standards; 3.75 percent for change in authorizers)	
Expansion Requests (3.75 percent)	1
Ready to Open Standards (3.75 percent)	2
Change in Authorizers (3.75 percent)	1
B.3: Contract Term, Negotiation and Execution (7.5 percent)	1
B.4: Performance Outcomes and Standards (11.25 percent)	1
B.5: Authorizer’s Processes for Ongoing Oversight of the Portfolio of Charter Schools (7.5 percent)	1
B.6: Authorizer’s Standards and Processes for Interventions, Corrective Action and Response to Complaints (3.75 percent)**	1
B.7: Charter School Support, Development and Technical Assistance (3.75 percent overall weight)**	1
B.8: High-Quality Charter School Replication and Dissemination of Best School Practices (3.75 percent)**	4
B.9: Charter School Renewal and Termination Decisions (15 percent)	1
Total Performance Measures B Rating:	1.20

**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 1-Approaching Satisfactory

Finding: While the authorizer has a clear and compelling mission, it is not aligned to charter school authorizing.

- Pillsbury United Communities – Office of Public Charter Schools (PUC) notes in the narrative (and their strategic plans confirm) that it employed two different missions over the review term. The first, which is included in the charter school strategy document that was updated February, 2015, states, “PUC charter schools will: offer bold and innovative educational strategies; provide an environment that promotes respect for all students and their individual identities; and engage students in academic and authentic learning opportunities, service learning, and personal development.” The updated mission, which is included in the authorizer’s 2018-2022 strategic framework, states, “PUC charter schools boldly engage and affirm all students in innovative, challenging, authentic, and equitable learning opportunities.” Although the mission statements refer to the work that its charter schools will do, they do not describe PUC’s role as the charter school authorizer.
- The response inadequately describes how the authorizer carries out its current and former mission by chartering schools. Within the narrative, the authorizer explains how it is working to carry out its mission. However, the narrative and strategic framework brochures largely describe the work that the overall non-profit agency is completing. While the narrative indicates that PUC charter schools are serving students who have not experienced success in traditional public school settings or who have been underserved educationally, neither the narrative nor strategic documents (e.g., plans and brochures) describe specifically how PUC is implementing innovative, challenging, authentic, and equitable learning opportunities. Although the authorizer’s current strategic framework outlines the role of an authorizer, this explanation is not tied to its mission statement.
- The authorizer generally implements the mission from its commissioner-approved authorizing plan (AAP). According to the AAP, PUC carries out its mission by serving students who have not experienced success in traditional public school settings or who have been underserved educationally. This includes students who are homeless or highly mobile, students who experience poverty, students who have dropped out of school, students who are involved in gangs and students who are seeking out a school model “reflective of their situational needs and assets.” Yet, it should be noted that review of the AAP (for which, according to Minnesota Department of Education (MDE), updates were submitted by PUC on October 28, 2019) shows that the authorizer did not update the wording of its mission to align with its strategic plan. In the authorizer review and comment submission form, the authorizer explained that “the language was simply shortened, but all key elements remain.”

Key Evidence:

- A.1 Narrative
- AAA/AAP
- Charter Dept Strategy Document Updated 2-4-15
- PUC-OPCS Strategic Framework 2018-2022
- PUC-Strategic Framework Brochure
- PUC Overview Brochure
- 20.01-14 MDE Review of PUC AAP Revisions
- PUC Authorizer Review and Comment MAPES 2020

A.2 Measure: Authorizer Organizational Goals

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

Performance Level Rating: Level 1-Approaching Satisfactory

Finding: The authorizer has clear organizational goals aligned with its mission and Minnesota charter school statutes; however, goals are not driven by specific criteria and timelines.

- PUC has a strategic framework for 2018-2022 with four core strategies: influence public education for equity; improve student outcomes within a portfolio of schools; provide network support to schools; improve internal practices. These are aligned with Minnesota Statute 124E.01 Subd. 1 (1). While the strategic framework includes criteria for each goal (e.g., influence authorizing practices; develop strategy to take good schools to great schools), the criteria are not measurable and do not include adequate timeframes. Additionally, the authorizer submitted goals, criteria and timeframes documents for 2012-2017 and 2018-2022; however, although these documents included the goals from the strategic framework and demonstrated activities (e.g., revamping of K-8 performance framework; portfolio outperforming local schools) the documents did not include specific criteria or specific timeframes other than the span of the framework (e.g., 2018-2022). In its narrative, PUC noted that its timeframes for achievement of goals is five years; however, there is no documented evidence to show that the authorizer has criteria and benchmarks in place to measure its progress periodically and ensure that it is on track to meet its five-year goals.
- The authorizer lists organizational goals in its AAP that focus on seven strategies: 1) broadly articulating unique success and niches of schools; 2) expanding authorizing capacity; 3) identifying areas for internal improvement; 4) closing chronically low-performing schools; 5) identifying one to two schools for refresh interventions; 6) transferring in existing high-performing schools; 7) opening new, high-promising schools. Review of the 2012-2017 Strategies for Stronger Schools includes evidence of how the authorizer met these goals through 2017. For example, it states that, in alignment with its goal to expand authorizing capacity, PUC has implemented the communication and compliance tool through Epicenter, increased its staff, and strengthened its Advisory Committee. However, there is no documented evidence to show that PUC has implemented its goals beginning in 2018.
- The authorizer's organizational goals align with the authorizing mission. As stated above, strategic frameworks for 2012-2017 and 2018-2022 include the authorizer's strategic goals, alignment and an explanation of how they align with the authorizer's mission. For example, for the goal of expanding authorizing capacity, PUC aligns this work with its mission to strive toward continuous improvement. It should be noted, however, that PUC's mission does not refer to the role it has in authorizing.

Key Evidence:

- A.2 Narrative
- AAA/AAP
- PUC-OPCS Strategic Framework 2018-2022
- 2012-2017 Goals, Criteria, Timeframes for Achievement
- 2018-2022 Goals, Criteria, and Timeframes for Achievement
- 2012-2017 Final Strategic Priorities Update
- Charter Strategy Document Progress Update - 7-25-15
- 16 Aug_26 OPCS Retreat Action Items
- 16 Jun_ 2 Turnaround Strategies & Potential Schools
- 19 Jan_ 25 OPCS Retreat Notes
- 19 Jan_25 OPCS Retreat Agenda
- 2015 Sept OPCS Retreat Notes and Action Items
- PUC Retreat Notes 1-19 (photos)
- PUC Authorizer Review and Comment MAPES 2020

A.3 Measure: Authorizer Structure of Operations

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

Performance Level Rating: Level 2-Satisfactory

Finding: The authorizer has a clear structure of duties and responsibilities that sufficiently meets the needs of the portfolio of charter schools.

- A clear structure of duties and responsibilities is defined and charted, and it sufficiently meets the needs of the portfolio of charter schools. PUC's organizational chart shows a clear delineation of roles for the Office of Public Charter Schools, including the board of directors, a President/Chief Operating Officer, and a Director. Reporting to the Director are the Authorizer Liaison, Associate Authorizer Liaison, Oversight and Evaluation Manager and Compliance Coordinator. The organizational chart also shows that PUC has a Charter Advisory Council. Review of job descriptions shows that each position on the organizational chart has specific responsibilities. For example, the Director's core functions are: 1) oversight support and environmental marketing; 2) general office duties and administrative support; and 3) providing compliance and quality oversight of the schools within PUC's portfolio of charter schools. The core job functions of the Oversight and Evaluation Manager are: 1) to provide summative evaluations for high-stakes decision-making; 2) to provide ongoing oversight (e.g., communication, coordination around convening school representatives, data analysis); 3) to develop and assist with required state and federal reporting; and 4) to complete other agency-wide initiatives or special events as needed. The staffing chart indicates that the total full-time equivalent (FTE) is 4.5 staff to manage a portfolio of 21 schools (20 operational, 1 pre-operational). The charter school leader survey shows that 76 percent of respondents (n=17 total respondents) agree or strongly agree that the staffing level of the authorizer is sufficient to meet their school's needs, although 12 percent disagree, and 12 percent strongly disagree.
- The structure of duties and responsibilities is updated when necessary. According to the narrative and as is reflected in the PUC staff timeline chart, the Director, Authorizer Liaison, and Associate Authorizer Liaison positions have been in place since 2015. During the term of the review, PUC eliminated two positions (Operations Manager and Special Projects Manager) and added two positions in 2020 (Oversight and Evaluation Manager [1.0 FTE] and Compliance Coordinator [0.5 FTE]). During the authorizer interview, participants explained that PUC decreased staffing due to financial challenges across the larger organization but they say that they have been able to add staff recently to better support its portfolio of schools. It should be noted that PUC's current staff to school ratio is 1:4.7, which is lower than NACSA's suggested ratio of 1:6 for portfolios of under 50 schools.
- The authorizer appropriately manages, retains and safeguards school and student information and records relating to authorizing. PUC's policy from its handbook around the use of technology and equipment outlines general expectations regarding staff use of the internet, computer equipment, software, desk phones and voicemail to facilitate work-related communication. The authorizer provided information regarding the MACC Commonwealth Technology policy, which specifically describes protections of technology systems and security and access controls. During the interview, the authorizer explained that it internalized all of its safeguarding of student records, and submitted invoices from 2016, 2018, and 2020 to confirm the use of Epicenter.

- During the authorizer interview, participants noted that through the recent addition of staff, the authorizer has ensured a sufficient structure as well as staffing levels to meet the needs of its portfolio. While survey data indicated that 76% of school leaders agreed or strongly agreed that PUC has sufficient staff to oversee schools within their portfolio, 24% disagreed or strongly disagreed, and during the interview with school leaders, responses were inconsistent, with some participants indicating that the structure and staffing levels were not adequate to meet the needs of all schools. Moreover, due to the aforementioned reduction in staffing between 2017 and 2019, the authorizer did not meet level 2 standards for at least four years. It should be noted that, in its authorizer review and comment submission form, the authorizer stated that it interprets 76% as evidence of consistency.

Key Evidence:

- A.3 Narrative
- AAA/AAP
- PUC-OPCS Department Organization Chart
- PUC-OPCS Director Job Description
- Charter School Authorizer Liaison Job Description
- Associate Charter Liaison Job Description
- Oversight and Evaluation Manager Job Description
- Compliance Coordinator Job Description
- PUC-OPCS Staff Timeline Chart
- PUC EQUIPMENT and TECHNOLOGY USE from PUC Handbook
- MCW All Technology Policy
- Invoices from Institute for Excellence in Education (4 samples)
- Authorizer interview, September 17, 2020
- Charter school leader interview, September 18, 2020
- PUC Authorizer Review and Comment MAPES 2020

A.4 Measure: Authorizing Staff Expertise

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

Performance Level Rating: Level 3-Commendable

Finding: Authorizing staff has appropriate experience, expertise and skills in charter school academics, operations, finance and law to oversee the portfolio of charter schools.

- Authorizing staff has appropriate experience, expertise and skills in charter school academics and operations, and submitted evidence of contracting expertise in areas of finance and law. The Director of PUC and Charter School Liaison have been in place for eight years, and the Associate School Liaison has been in that role for five years. There is evidence of strong academic expertise within the advisory council. One member, who has served on the council since 2016, served as Director of Curriculum and now middle school principal. He also worked as director of K-8 for a charter school. Another member has a Ph.D. in Curriculum and Instruction for elementary education and an AMI Montessori certificate. A third member brings special education expertise and was assistant director of STEP Academy from 2011-2018. Additionally, the authorizer submitted evidence that the authorizer has been contracting with experts in law and finance. Invoices from 2018 and 2020 show that they employed the firm Beatrice, David and Associates to conduct financial reviews. The submitted documents also included the certificate for the accountant it contracted, to demonstrate her status as a certified public accountant (CPA). Invoices with Martin Law Firm for July and August 2020 show that the authorizer contracts with Martin Law Firm, an external law office, for legal counsel.
- Authorizing staff are able to sufficiently oversee the portfolio of charter schools. As demonstrated above, the authorizing staff brings experience in a number of areas, including academics, operations, finance and law. Moreover, review of staff resumes and presentations shows that PUC brings knowledge and experience in turnaround practices and in equity-focused teaching and learning. In the interview, various school leaders provided examples of PUC's expertise in policy and equity work, and noted that any areas where PUC staff did not have sufficient expertise, they were willing to conduct further research and training to build the necessary skills and knowledge. For example, they noted that when one of the schools in the portfolio started an online school, PUC acted as a learning partner to better understand the best practices of online education, and to gather appropriate resources to oversee the school's unique model.
- There is evidence within the staff timeline and submitted resumes that demonstrate that PUC's staff expertise aligns with national standards. The National Association of Charter School Authorizers (NACSA) standards state that the authorizer, "Enlists expertise and competent leadership for all areas essential to charter school oversight—including, but not limited to, education leadership; curriculum, instruction, and assessment; special education, English learners, and other diverse learning needs; performance management and accountability; law; finance; facilities; and nonprofit governance and management—through staff, contractual relationships, and/or intra- or inter-agency collaborations." The two members of the advisory council noted above demonstrate expertise in school leadership, in curriculum, in instruction and in meeting the needs of diverse student populations. Core members of PUC's staff also show evidence of performance management, accountability, nonprofit governance and management. Through contractual relationships with Martin Law Firm and Beatrice, David and Associates PUC demonstrates additional legal and financial expertise aligned with NACSA standards.

- Level 2 indicators were met for at least four years. As indicated above, PUC’s Director and Charter School Liaison have been in place for eight years, and the Associate School Liaison has been in that role for five years. Additionally, review of the Advisory Council Timeline shows that multiple members who bring key experience have been active since 2016. Finally, a review of external invoices confirms that the consultant conducted a financial review for Quality School Reviews (QSR) in 2017.
- Although PUC’s staff (including contractors) have credentials demonstrating experience, expertise and skills in charter school finance and law, they do not have credentials in academics and operations. A photograph of the certificate shows that PUC’s contracted financial consultant is a CPA. Furthermore, a list of the authorizer’s board of directors confirms that there is an attorney. However, while one of the key members of PUC’s Advisory Council is actively working to earn his license in K-12 administration, documentation shows that he has not yet earned it. Moreover, there is no documented evidence to show that any staff have certification in charter school operations. Review of resumes confirms that PUC’s director holds a Master’s degree in Public Administration, which, according to the narrative, included coursework in budgeting, finance, implementation of city government services, human resources, communications, policy, nonprofit organizational development, board governance and statistics; however, there is no additional documentation to show how this credential aligns with charter school operations specifically. In the narrative, the authorizer indicated that one of PUC’s board members serves as Dean of the Hubert H. Humphrey School for Public Affairs at the University of Minnesota and that person works closely with the authorizer; however, there is no additional documentation to confirm this person’s credentials or in what capacity she works with PUC’s Office of Public Charter Schools. Additionally, although the authorizer explained, and the member’s resume confirmed, that one of its Advisory Council members has extensive education experience, including as Minnesota’s Commissioner of Education between 1996 through 1999, review of the Advisory Council Membership Timeline does not include reference to this member; therefore, it is unclear to what extent he is involved with the authorizer.

Key Evidence:

- A.4 Narrative
- AAA/AAP
- Resume for Angie Tapia
- Resume for Antonio Cardona
- Resume for Emily Edstrom Moore
- Resume for Kristin Robert
- Resume for Larry McKenzie
- Resume for Tierney Carroll
- Resume for Olivia Christensen
- Resume for Mark Krug
- Wendy B Hines Biography
- James K Martin Resume 2020 05 26 and invoices 2018-2020
- Advisory Council Resumes
- Certification for Wendy Hines as Certified Public Accountant
- Certification for Mohammed Abdurahman as a K-12 Counselor
- Advisory Council Membership Timeline
- Invoice Martin Law Firm
- Invoice Beatrice, David and Associates
- Leading Forward Conference Program October 2019
- FieldGuide Web Final
- Authorizer interview, September 17, 2020
- Charter school leader interview, September 18, 2020
- PUC Authorizer Review and Comment MAPES 2020

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

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

Performance Level Rating: Level 1-Approaching Satisfactory

Finding: Professional development is planned to build the knowledge and skill base of authorizing leadership and staff; however, there is no evidence that it is sufficiently aligned to the AAP.

- Professional development provided by PUC is intentionally planned to build the knowledge and skill base of authorizing leadership and staff. The narrative and annual reports state that PUC employees are provided regular professional development in order to achieve and maintain high standards of authorizing practices and to enable continual agency improvement. First, staff meet with their supervisor (according to the PUC performance evaluation form) and identify strengths and areas for growth, in addition to identifying one to two professional goals for the coming year. Additionally, staff are asked to prioritize professional development in one area. Annual reports state that these forms are evaluated on an annual basis and the authorizer submitted sample performance evaluations, some of which include an individualized professional development plan. For example, one plan includes goals such as, “Attend at least one professional development opportunity on data visualization” and another states, “Complete informational interviews with at least 2 professionals in the non-profit policy arena.” The annual reports state (and review of PUC PD FY 2016-20 documents confirms) that PUC staff attended national and local conferences, including the NACSA conference (FY 2016, FY 2017, FY 2018, FY 2019), Education Equity in Action (FY 2016 and FY 2017), the Minnesota Council of Nonprofits Conference (FY 2018 and FY 2019), and the MDE Authorizer Conference (FY 2018 and FY 2019). Agendas and sign-in sheets submitted by MDE indicate that PUC also attended Authorizer Conferences in FY 2017 and FY 2020 at MDE.
- Professional development aligns with authorizer’s operations, mission and organizational goals for overseeing its portfolio of charter schools. For example, the Educational Equity Leadership Institute, which the authorizer hosted, aligned with the authorizer’s focus on affirming students in equitable learning opportunities and committing to valuing diversity in all forms, as reflected in its mission. According to the PUC PD FY 2016 to FY 2020 table, five PUC staff participated in the conference. Additionally, the Minnesota Council of Nonprofits Fundraising and Sustainability Conference supports the authorizer’s goal to provide network support to its schools and improve internal practices. Finally, the Bush Foundation’s Personalized Learning Journey Cohort aligned with PUC’s second goal of improving student outcomes within the portfolio of schools by engaging students in innovative, challenging learning opportunities and equitable communities where students excel academically.

- Professional development attended by PUC staff is not sufficient to fulfill the professional development commitments provided in the authorizer’s AAA/AAP. For example, the AAP describes the creation and use of a personal professional development plan created between staff and supervisors. Though samples of these plans were submitted, the plans do not adequately address all aspects of authorizing. The AAP states, “PUC-OPCS employees are provided regular professional development in order to achieve and maintain high standards of professional authorizing practice and to enable continual agency improvement.” Staff attends professional development and sets professional development goals annually. Review of the evaluation forms shows that staff communicate changes that could be made to improve their effectiveness. Answers ranged from needing to document visits and conversations better when working with schools to eliminating redundancies in staff responsibilities to creating better internal communication system, which is aligned with PUC’s goal to identify areas for internal improvement. Review of a PowerPoint presentation to PUC’s board from February 2020 shows that the authorizer provided a training to its board members. The AAP states, “Advisory Council is trained in a manner appropriate to the role and in accordance with Appendix 6: Advisory Council Roles & Responsibilities.” In its authorizer review and comment submission form, the authorizer states that all Advisory Council members are provided with the Roles and Responsibilities document and on-boarded at the beginning of their term; however the authorizer did not submit documentation to confirm this.

Key Evidence:

- A.5 Narrative
- AAA/AAP
- FY 2016 Annual Report – Pillsbury United Communities
- FY 2017 Annual Report – Pillsbury United Communities
- FY 2018 Annual Report – Pillsbury United Communities
- FY 2019 Annual Report – Pillsbury United Communities
- PUC performance evaluation form 1 2016-2017
- PUC performance evaluation form 2 2017-2018
- PUC performance evaluation form 3 2017-2018
- PUC PD FY2016-20
- Personalized Learning Journey Slide set
- MDE Trainings – Agendas and sign-in sheets
- 20 Feb 18 OPCS Presentation to PUC Board
- Authorizer interview, September 17, 2020
- Charter school leader interview, September 18, 2020
- PUC Authorizer Review and Comment MAPES 2020

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

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

Performance Level Rating: Level 1-Approaching Satisfactory

Finding: Although the authorizer’s resource allocations are sufficient to fulfill its authorizing responsibilities, they do not align with what is committed in the AAP.

- Resource allocations for authorizing are inconsistent with the resources to portfolio size ratio the authorizer committed to in its AAP. The budget within the AAP indicates that the authorizer will have an FTE of 1.6 to 1.9 for a portfolio of up to 22 schools (PUC currently has 20 operational and one pre-operational school). The budget also projects a total income of between \$390K (FY 2016) and \$402.6K (FY 2020). Yet projected expenses in FY 2016 are \$409.3K, and the authorizer explains that deficits will be covered through philanthropic contributions; however, there is no documentation to confirm the organization’s donation history. The statement of income and expenditures for FY 2017 and FY 2018 show no amount for contributions. Moreover, a review of the authorizer’s staffing timeline chart shows that staffing levels in FY 2019 and FY 2020 exceeded projections within the budget. The proposed five-year budget within the AAP includes staffing allocation of 1.6 FTE to 1.8 FTE for a portfolio size of 19 to 22 schools (PUC currently has 21); however, as noted above, PUC currently has 4.5 FTE, which is greater than what is projected. Although the current staffing aligns with the AAP narrative of maintaining a minimum of 1:12 staff to school ratio, there is no documentation to show how PUC has reallocated resources to support its current staffing structure. Finally, the statement of income and expenditures for FY 2016 shows a budget deficit in the amount of \$59,376.42. During the interview and in the narrative, the authorizer explained that this deficit was due to a conference that the authorizer hosted for its staff and authorized schools. While the authorizer also stated that any of the Office of Public Charter School deficits are covered by the larger PUC organization, there is not documented evidence to support this.
- Resource allocations are sufficient to fulfill authorizing responsibilities. The narrative states that PUC maintains a “healthy budget” and “responsibly applies its funds to a robust authorizing practice.” As previously indicated, PUC currently has 4.5 FTE for its portfolio of 21 schools, which is a 1:4.6 staff to school ratio. Review of the authorizer’s statements of income and expenditures for FY 2016, FY 2017, FY 2018 and FY 2019 show that the majority of PUC’s income is based on school sponsorship fees, and that it allocates the majority of its resources on staffing (including consulting fees), program events, and trainings and meetings, which are aligned with its authorizing responsibilities. It should be noted that an email from MDE to the authorizer dated January 6, 2020 states that funds received from portfolio schools exceeded maximum authorizer fees allowed by law for FY 2017, FY 2018, and FY 2019. In each case, funds exceeded the maximum by \$500. During the interview, PUC explained, and an email sent by the authorizer to school directors and governing boards confirmed, that the overcharge was a share of the Epicenter fee agreed upon by schools within the portfolio. Additionally, invoices sent to schools include the authorizing fee and an additional line item for the Epicenter charge.

Key Evidence:

- A.6 Narrative
- AAA/AAP
- AAP Appendix 8. 2016 - 2021 Budget
- 16.09-30 PUC 16 Sep_26 Authorizer Statement of Income and Expenditures Exec Summary
- 17.10-02 PUC Authorizer Statement of Income and Expenditures
- 18.09-30 PUC Authorizer Statement of Income and Expenditures
- 20.01-06 PUC Statements of Income and Expenditures
- 2017 PUC Operating Budget Master Draft
- Epicenter Email 1 of 2
- PUC 2019-2020 authorizer fees Invoice _RMSA
- PUC 2019-2020 authorizer fees Invoice 2.xlsx - MTCS
- Authorizer interview, September 17, 2020
- PUC Authorizer Review and Comment MAPES 2020

A.7 Measure: Authorizer Operational Conflicts of Interest

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

Performance Level Rating: Level 1-Approaching Satisfactory

Finding: The authorizer has a clear conflict of interest policy, but implementation is not consistent.

- The authorizer has a conflict of interest policy, but it is not consistently implemented. PUC has a conflict of interest policy that defines a conflict of interest, and its policy asks staff to identify any outside interests, outside activities, and gifts, gratuities and entertainment that might cause conflicts of interest. The policy also includes definitions (e.g., “family member,” “material financial interest”) and procedures to avoid a conflict of interest. The policy, which was submitted as Appendix 10 of the AAP, states that: 1) each new “responsible person” (e.g., employee or contractor) will be required to review the conflict of interest policy and acknowledge in writing that they have done so; 2) each “responsible party” will complete disclosure on an annual basis; 3) the policy will be reviewed annually by each member of the board of directors. In the narrative, the authorizer explains that all employees, board members, advisory council members, and reviewers have signed conflict of interest statements and signed conflict of interest statements confirm that this is the case. Although the authorizer submitted signed conflict of interest policies, there is not documentation that they were signed on an annual basis. For example, submitted documents included signed handbook acknowledgement forms (including the conflict of interest policy) from internal authorizing staff between 2015 and 2018.
- The authorizer does not follow its conflict of interest policy as outlined in its AAP. As stated above, the AAP includes PUC’s conflict of interest policy which outlines that employees and contractors will review the policy annually and acknowledge in writing that they have done so; however, there is no documented evidence that this occurred.
- The authorizer does not ensure that application review and decision-making processes are free of conflicts of interest. The aforementioned policy outlines procedures the authorizer will follow in the event of perceived or actual conflicts, including disclosure of all facts material to conflicts of interest for board members; disclosure of any conflicts to the chair of board meetings; no discussion or involvement in meetings related to conflicts of interest; no voting on matters that involve conflicts of interest. In the signed conflict of interest forms, various parties identified potential conflicts of interest. However, there is no documented evidence to show how those were addressed to avoid potential or actual conflicts of interest. Moreover, while the submitted documentation included one example of meeting minutes from September 2020, in which one member recused themselves, that person was not identified in the meeting minutes and it is therefore unclear whether a conflict of interest was avoided. Thus, it is unclear that PUC ensures that decision-making is free of conflicts of interest.

Key Evidence:

- A.7 Narrative
- AAA/AAP
- Conflict of Interest Policy - 2012
- PUC Employee Conflict of Interest Policy
- PUC Employee Handbook
- Ismail Ahmed - Signed Conflict of Interest Form
- 20 Sept_22 Grade Expansion Recap for PUC Board
- Advisory Council Signed COI Forms 2015-2020 (19 total)
- PUC Staff Handbook Acknowledgements 2012-2020 (7 total)
- March 2012 PUC Board Minutes (Sample March 2012 and March 2015)
- May 2015 PUC Board Minutes
- Authorizer interview, September 17, 2020
- Charter school leader interview, September 18, 2020

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

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

Performance Level Rating: Level 3-Commendable

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

- PUC has a policy to ensure school autonomy. The AAP includes language from the authorizer’s contract template (Appendix 12) that outlines ways in which it ensures schools’ autonomy. Specifically, Section 2 describes voluntary authorization and the independent status of the school. Section 6.1 describes the governance structure and specifically states that the school’s board shall decide matters related to the operation of the school, including but not limited to budgeting, curriculum and operating procedures. It should be noted that although preservation of school autonomy is included in PUC’s contract, there is no stand-alone policy contained within the AAP. Furthermore, when asked during the authorizer interview whether PUC had a policy to ensure school autonomy, participants stated that they did not have a policy outside of the contract language.
- The authorizer’s policy on school autonomy establishes and recognizes schools’ authority over academics, financials and operations and respects schools’ authority over the day-to-day operations. Article III, Section 3.1: Oversight Responsibilities of PUC indicates that the authorizer has the responsibility to oversee the school’s academic, financial, operational, and student performance, including the school’s compliance with the contract and applicable law.
- PUC’s practice aligns with policy; the authorizer holds charter schools accountable for performance outcomes and compliance with statute rather than on processes and inputs. Exhibit K of the contract states that PUC evaluates schools in four primary areas: 1) academic performance; 2) financial performance; 3) operational performance; and 4) governance performance. It also describes the ongoing evaluation criteria, processes and procedures and specifically notes that evaluation is determined in accordance with statutory deadlines, occurs within an appropriate timeline, and maintains the autonomy of the authorized charter school. According to the AAP, the authorizer ensures schools’ autonomy by allowing them choice in assessment indicators aligned with their Performance Framework; allowing schools to make their own decisions regarding instructional program, design, use of time, and budgeting; and minimizing administrative and compliance burdens through the use of Epicenter and readily available data sources (e.g., MDE report card online portal).
- The authorizer’s policy aligns with nationally recognized quality authorizing standards. According to NACSA, a quality authorizer: honors and preserves the core autonomies crucial to school success; assumes responsibility not for the success or failure of individual schools, but for holding schools accountable for their performance; minimizes administrative and compliance burdens on schools; and focuses on holding schools accountable for outcomes rather than processes. PUC’s contract outlines the way in which it holds schools accountable to specific academic, financial, operational, and student performance outcomes. It also ensures school success by providing oversight and monitoring in areas of compliance with the contract and applicable law. As noted above, PUC has implemented tools such as Epicenter to minimize reporting burdens.

- The authorizer’s policy and practices to ensure school’s autonomy are not consistently verified externally. In the Charter School Leadership survey, 68% of respondents agreed or strongly agreed that the authorizer preserves the school board’s autonomy over policy matters related to operating the school, while 32% disagreed or strongly disagreed. During the school leader interview, when asked about how the authorizer approached school autonomy, participants gave differing answers. While some participants explained that PUC provides guidance without mandating decisions related to day-to-day operations, others described instances when they believed the authorizer overstepped their authorizing role, such as mandating staffing decisions. Participants also articulated that they are not aware of an authorizer policy related to school autonomy.

Key Evidence:

- A.8 Narrative
- AAA/AAP
- PUC Charter School Contract Template
- Authorizer interview, September 17, 2020
- Charter school leader interview, September 18, 2020

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

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

Performance Level Rating: Level 1-Approaching Satisfactory

Finding: Although the authorizer has structures in place to self-evaluate, they are not planned or implemented in a way to determine its capacity to oversee its portfolio of charter schools.

- According to the authorizer’s narrative and annual reports, PUC uses four major mechanisms for self-evaluation, including: individual professional development plans; department retreats; strategic planning; and external evaluations. Yet there is no documented evidence to show that these are designed to intentionally evaluate its capacity or practices (e.g., utilizing data). For example, sample professional development plans include individual reflections and goals, such as, “Play a role with regard to policy of charter schools,” but there is no evidence that the results are analyzed holistically to evaluate the overall internal ability to oversee charter schools. The department retreat agenda from January 23, 2019 includes discussions on the strategic framework and core initiatives, but it is unclear how these discussions tie to a self-evaluation process. Similarly, the February 2020 slide set includes a focus on reflecting on past successes and failures to plan for future work; however, there is no documentation to show how the authorizer used the information garnered from this meeting to inform its systems, processes and practices. Additionally, as stated in A.2, the strategic plan includes goals over the four-year term, but does not include interim benchmarks for the purpose of ongoing self-evaluation against goals. Finally, though there is submitted evidence of PUC’s NACSA external evaluation, it was conducted in 2014, outside of the review term. Although the authorizer noted in its authorizer review and comment submission form that it has used results of the 2014 NACSA evaluation to shape its work throughout the term of the review, there is no additional documented evidence to show that PUC engaged in an external evaluation during the term of the review.

Key Evidence:

- A.9 Narrative
- AAA/AAP
- FY 2016 Annual Report – Pillsbury United Communities
- FY 2017 Annual Report – Pillsbury United Communities
- FY 2018 Annual Report – Pillsbury United Communities
- FY 2019 Annual Report – Pillsbury United Communities
- 2019 PUC Performance Evaluation and Development Plan Blank
- 19 Jan_25 OPCS Retreat Agenda
- PUC Strategic Stepback 2020 with notes
- 17 Jan_13 PUC-OPCS Educational Equity Organizational Assessment
- 17 Feb Performance Framework Survey (Responses)
- Focus Groups Agenda and Notes
- PUC Directors Strategic Feedback Session 1-3 (photos)

A.10 Measure: Authorizer High-Quality Authorizing Dissemination

Guiding Question: *To what degree does the authorizer disseminate best authorizing practices and/or assist other authorizers in high-quality authorizing?*

Performance Level Rating: Level 3-Commendable

Finding: The authorizer regularly 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. According to the narrative, a representative from PUC has been active in the Minnesota Association of Charter School Authorizers (MACSA). MACSA agendas and minutes between 2016 and 2020 confirm the involvement of key PUC staff members. The MACSA Committee Structure document shows that PUC's Authorizer Liaison is MACSA President for 2020-2021. Annual reports state (and review of PUC PD FY 2016-20 documents confirms) that PUC staff have also attended national and local conferences. For example, PUC staff attended the NACSA conference (FY 2016, FY 2017, FY 2018, FY 2019), and the MDE Authorizer Conference (FY 2018 and FY 2019). Agendas and sign-in sheets submitted by MDE indicate that PUC also attended Authorizer Conferences in FY 2017 and FY 2020 at MDE.
- The authorizer regularly shares best practices with other authorizers. In addition to regular attendance at MACSA meetings, the narrative states that representatives from PUC presented at the National Urban Fellows Leadership Conference and the Alliance for Education Policy group to share best practices. While an email from Alliance confirms that PUC was invited to participate, there is no documented evidence that the authorizer presented. A PowerPoint presentation from a 2019 NACSA session shows that PUC shared best practices around community-driven school turnaround. A review of the Field Guide document, a case study on the turnaround of an underperforming school within PUC's portfolio, credits PUC with being a partner during its Community-driven School Turnaround process. Finally, review of the 2018 Regional Turnaround Strategy Group PowerPoint shows that PUC's Authorizing Liaison shared information about MACSA's work in community-driven turnaround efforts.
- While there are various letters and emails that indicate that the authorizer has collaborated with other authorizers and organizations, there is no documented evidence to demonstrate that PUC's best practices or technical assistance were sought out by other authorizers. For example, in February 2020, Bethel University Charter Authorizing Program invited PUC (among other authorizers) to participate in reviewing new school applications (as evidence by email correspondence) and in March 2018, Osprey Wilds Environmental Learning Center (formerly Audubon Center of the North Woods) emailed a number of authorizers to provide feedback regarding the Federal Charter Schools Program (CSP) Grant. Although this confirms that PUC worked with other authorizers, it does not show that PUC's specific best practices or technical support were sought out. In the authorizer review and comment submission form, the authorizer described examples of phone-based or in-person conversations during which other authorizers sought out PUC's best practices; however, there is no documented evidence to confirm these interactions.

Key Evidence:

- A.10 Narrative
- AAA/AAP
- FY 2016 Annual Report – Pillsbury United Communities
- FY 2017 Annual Report – Pillsbury United Communities
- FY 2018 Annual Report – Pillsbury United Communities
- FY 2019 Annual Report – Pillsbury United Communities
- Community-Driven School Turnaround in MN (FieldGuide Web Final)
- NACSA Presentation 2019_TSLP.PUC.STC
- Regional Turnaround Strategy Group Session August 2018
- Regional Turnaround Strategy Group Leading and Lagging Indicators of Success (with PUC slides) April 2018
- MACSA Meeting Minutes
- Email correspondence Bethel University Charter Authorizing Program
- 18 Mar_30 Audubon Assistance Request
- Sample MACS Board January Agenda 2018-2019
- Sample MACSA Meeting Minutes 2015-2020
- Sample Technical Assistance Requests 2017-2020
- PUC Authorizer Review and Comment MAPES 2020

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

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

Performance Level Rating: Level 3-Commendable

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

- According to MDE, since the start of the current term, the authorizer was 96 percent compliant overall. The authorizer was 100 percent compliant in the submission of authorizer annual reports, new school affidavits, supplemental affidavits, change in authorizers, renewed charter contracts, merger charter contracts and attendance at MDE required trainings. Two areas noted as noncompliant were for the submission of statement of income and expenditures and new school contract submission. According to MDE, PUC did not meet the submission deadline of September 30, 2020 for its statement of income and expenditures. Additionally, PUC submitted an executed new school contract for Gateway STEM Academy on September 11, 2017 after the submission deadline of August 22, 2017.

Key Evidence:

- A.11 Narrative
- MAPES Compliance Data Spreadsheet – Pillsbury United Communities

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

MAPES Performance Measures A Rating for Pillsbury United Communities is 1.90.

Performance Measures A: Rating Drivers

- While PUC's Office of Public Charter Schools has a mission that focuses on charter schools, the mission does not reflect its own role in authorizing. Additionally, PUC's goals do not have specific timeframes and criteria by which to measure its work; there is no evidence to show that the authorizer regularly monitors its progress to ensure that it will meet the goals laid out in its strategic initiatives.
- PUC has a clear staffing structure, which includes 4.5 FTE core staff, an Advisory Council and consultants. The staff bring experience in academics, finance, operations and law, which is sufficient to oversee its portfolio. Due to financial challenges at the larger PUC umbrella organization level, the authorizer experienced inconsistencies in staffing over the term of the review.
- The authorizer's budget is sufficient to fulfill its authorizing responsibilities. However, the proposed budget in the AAP does not align with the authorizer's actual budget.
- The authorizer has a policy to avoid conflicts of interest; however, it is not implemented as written.
- PUC is an active member of the authorizing community, participating regularly in MACSA meetings and taking leadership roles; presenting to NACSA conferences and other state and national meetings; and collaborating with Minnesota-based authorizers to improve authorizing practices.

Performance Measures A: Recommendations

- Revise the authorizing mission to reflect PUC's authorizer responsibilities; specifically, define what its role is in supporting the charter schools within its portfolio. Additionally, be sure to update all public documents with new wording of mission.
- Draft specific, measurable, achievable, realistic and timebound (SMART) goals and associated action steps by which to measure PUC's work and gauge progress toward the goals in the strategic initiatives.
- When designing and planning PUC staff professional development, reference the AAP to ensure that PUC is meeting the requirements set forth within it.
- Draft a budget that reflects the staffing and resource allocation that PUC will need to fulfill its authorizing work. Ensure that there are specific contingencies (e.g., fund balance) to account for unforeseen deficits.
- Review the conflict of interest policy on an annual basis with all staff, consultants, Advisory Council members and board members. Ensure that personnel sign conflict of interest statements. In the event that a conflict of interest (perceived or actual) is raised, create a specific plan by which to avoid a conflict of interest moving forward.
- Create a written policy separate from the contract to ensure the autonomy of schools in PUC's portfolio and ensure that all schools have access to it.
- Create mechanisms by which to gather data regularly (e.g., annually, semi-annually) from schools using multiple sources (e.g., surveys, focus groups, meetings) to evaluate PUC's internal capacity and authorizing processes and practices.

Performance Measures B: Authorizer Processes and Decision-Making

B.1 Measure: New Charter School Decisions

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

Performance Level Rating: Level 1-Approaching Satisfactory

Finding: The authorizer has a comprehensive new charter school application; however, its decisions and resulting actions do not consistently align to its stated approval and process standards and promote the growth of high-quality charter schools.

- The authorizer's application process is comprehensive and includes clear application questions and guidance. It also includes fair, transparent procedures, and criteria for evaluation; however, it does not include clear timelines. The PUC New School Application document includes an overview of the application process, which includes an intent to apply (e.g., proposed school program, curriculum, grade levels to be served, target student population, proposed director); new school application submission (e.g., executive summary; mission, strategy and goals; academics; governance; financial; leadership and operations; student recruitment, enrollment, and outreach), application review (e.g., strengths, concerns, compliance); supplemental information request (if necessary); final decision; and applicant follow-up. The application also includes guidance on application submission and formatting and timelines for intent to apply, application submission, application evaluation, PUC submission of recommendation to PUC board, final decision and contract execution. Though no dates or timeframes are included on the timeline, the OPCS Processes Important Dates and Deadlines documents, which a screenshot confirmed is available on the authorizer's website, does include specific timeframes for new school applications. The submitted documentation also includes the Gateway STEM Academy New School Process document, which provides an explanation of the process in action for one of the authorizer's new school applicants. The application criteria includes a four-level rating scale (1-inadequate, 2-fair, 3-satisfactory, 4-excellent) and the rating guide within the new school application demonstrates that ratings are based on criteria around level of completion and strength of response (e.g., strengths outweigh weaknesses). For example, a level 4 rating, according to the guide, demonstrates that the applicant adequately addresses all criteria and the application reflects key strengths and only minor or no weaknesses. Conversely, a level 1 rating demonstrates that the applicant adequately addresses few or no criteria, and that in the responses, important weaknesses outweigh strengths. It should be noted that this rating system is intended to be applied to all aspects of the application, and there is no documented evidence of a rubric that provides more detailed guidance around specific criteria or defines terms within the rating system, such as "adequately" or "important".

- Submitted documents do not include sufficient evidence to determine whether the authorizer’s decisions and resulting actions are consistent across the portfolio of charter schools. Annual reports show that the authorizer approved Gateway STEM Academy (FY 2017), Horizon Science Academy (FY 2017) and Escuela Exitos (FY 2019) and did not approve Cross River Charter School (FY 2017) citing the insufficient academic model and lack of board capacity to facilitate opening the school. Although the new school application guidance document includes a rating guide on a four-point scale, review of the scoring completed by the Advisory Council for Cross River Charter School, Gateway STEM Academy and Horizon Science Academy shows that members scored the new school applications on a rating system that includes points between zero and eight. Furthermore, while the new school application guidance document includes an application component ratings section with an application component, rating and comment section, there is no documented evidence that this was used by evaluators as they reviewed the new school applications; therefore, it is unclear how they determined their ratings. Additionally, the narrative states that PUC received twenty-one letters of intent of which ten were denied outright and eleven invited to apply. Of those eleven applicants, two withdrew from the process, four were denied (though this was not reflected in the annual reports), and five were approved (which was also not reflected in the annual reports). The New School Decisions tracker for FY 2016 to FY 2020 summarizes the name of the school applicant, the date of the letter of intent and a final determination; however, the tracker does not explain why a school was approved or denied.
- PUC’s AAP states that it opens charter schools that promote high quality and align with national principles and standards. While the new school application guidance is included as an appendix in the AAP, as stated above, documentation does not include evidence to show that decisions and resulting actions have aligned with the AAP. The Advisory Council ratings do not follow the four-point scale as outlined in the new school application guidance (Appendix 2) and there is no documented evidence to show that they completed the application component ratings document to explain their ratings, as is described in the AAP.

Key Evidence:

- B.1 Narrative
- AAA/AAP
- FY 2016 Annual Report – Pillsbury United Communities
- FY 2017 Annual Report – Pillsbury United Communities
- FY 2018 Annual Report – Pillsbury United Communities
- FY 2019 Annual Report – Pillsbury United Communities
- New School Application Guidance
- OPCS Processes Important Dates and Deadlines
- Gateway STEM Academy New School Process
- New School Decisions FY2016-FY2020

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

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

Performance Level Rating: Level 1-Approaching Satisfactory

Finding: Although the authorizer's application process to evaluate proposals of charter school expansion requests and other interim changes is comprehensive, it does not consistently align with its AAP.

- The authorizer's application processes are comprehensive; include clear application questions and guidance; and include fair, transparent procedures and timelines and some rigorous criteria. The application for site and grade-level expansion asks applicants to: describe need; provide current academic data; provide evidence of board approval; provide proposed contract amendments; and provide operations and finance plans (e.g., marketing and student recruitment, facilities, budget). General application guidelines are included, such as how to submit the application and expectations for a table of contents, formatting, clearly labeled attachments and a general timeline for submission. The application states that the decision period is six to eight weeks, and that the application process includes PUC recommendations, review team recommendation, the board of directors' final decision, and submission of supplemental affidavits to MDE. The OPCS Processes Important Dates and Deadlines document also includes specific timeframes for site and grade level expansions, and a screenshot of PUC's website shows that the document is available publicly. Although PUC has a new school start-up checklist (i.e., ready to open) as part of its AAP, it is not clear how the authorizer uses this document. An incomplete New School Start-up Checklist was submitted for Gateway STEM in August 2016, but additional, complete checklists were not included in the submitted materials. The transfer application includes: a description of a successful application; application and submission format guidelines; and explanation of the process and decision-making. Applicants must include: an executive summary (e.g., school overview); a student and staff report; a description of the mission, strategy and goals; a description of leadership and operations at the school; an explanation of academic programming (e.g., classroom practices, educational program); a description of the school's governance (e.g., oversight, bylaws); and the school's financial performance (e.g., current budget, audits, current lease). While the application states that checklists and scoring rubrics are included in the application materials for reference, a review of the application showed that the only section that includes a scoring rubric is Section V (Academics), which is completed by the applicant. No other rubrics are included in the application. There is a reviewer recommendation page within the application that includes a space for ratings with general criteria (e.g. "the transfer school has demonstrated sound student performance and student achievement") for each section; however, the application does not include rating levels or define key concepts like "sound student performance."

- The authorizer’s decisions and resulting actions are consistent across the portfolio of charter schools. Annual reports show the following approved expansions (site and grade level): FY 2016 (none), FY 2017 (Friendship Academy of the Arts [site and grade], LoveWorks Academy and Stonebridge World School [early learning program recognition]). A review of the Supplemental Affidavit for Friendship Academy of the Arts (FAA) shows that the school saw a decline in reading and math proficiency between 2015 and 2016. Reading declined from 83.3 percent to 46.3 percent and math declined from 90.3 percent to 62.2 percent. According to the authorizer review and comment submission form, FAA was recognized as a National Blue Ribbon school in 2016, one of only five in Minnesota. LoveWorks Academy’s Supplemental Affidavit shows that in 2015, 8.5 percent of students were proficient on the Minnesota Comprehensive Assessment for reading, a decline from 12.1 percent in 2014, and that 10.1 percent of students were proficient in math, a decline from 13.6 percent in 2014. Yet, the authorizer approved a PreK grade expansion in 2017. The supplemental affidavit for Stonebridge World School shows that students made significant gains in reading and math growth between SY 2016 and SY 2017; however, the affidavit does not indicate how this translates to reading and math proficiency, nor is there any comparative data included in the application. In the narrative, the authorizer explains that the authorizer supported the addition of pre-kindergarten programs for LoveWorks Academy and Stonebridge World School as part of the schools’ improvement strategies. Finally, Appendix 18 of the AAP includes a new school start-up checklist, which, according to the narrative, PUC uses to determine a school’s readiness to open. For example, the checklist for Escuela Exitos, PUC’s pre-operational school, is mostly completed, but missing status information in some categories (e.g., administration, personnel, governance, learning program), which is why it has not yet transitioned to operational. The start-up checklist for Northeast Science and Polytechnic from 2016 is largely incomplete and, as a result, the school never opened.
- The authorizer’s decisions and resulting actions do not align with its AAP. PUC’s AAP states that its decisions and resulting actions align with its stated approval and process standards in order to promote the growth of high-quality charter schools; however, its decisions to approve expansions of schools with low academic performance (as shown above) does not align with its goal of growing high-quality charter schools. Finally, although PUC’s AAP states that PUC “looks for [transfer] schools that are academically sound, operationally proficient, governed appropriately, and fiscally sustainable,” the change in authorizer application for Cedar Riverside Community School submitted to MDE in 2016 noted that in 2015, the school was designated as a Continuous Improvement school by MDE. Review of the El Colegio change in authorizer application from 2016 shows that the school did not meet its annual yearly progress (AYP) status in math, reading and graduation in 2015. It should be noted that PUC’s contracts with Cedar Riverside Community School and El Colegio show that they both have an Exhibit M which includes outstanding obligations in the areas of academics, financial management and governance and remediation plans in each category.

Key Evidence:

- B.2 Narrative
- AAA/AAP
- FY 2016 Annual Report – Pillsbury United Communities
- FY 2017 Annual Report – Pillsbury United Communities
- FY 2018 Annual Report – Pillsbury United Communities
- FY 2019 Annual Report – Pillsbury United Communities
- Appendix 16. Site Expansion Application
- Appendix 17. Grade Expansion Application
- OPCS Processes Important Dates and Deadlines
- Appendix 18. New School Start-Up Checklist
- Appendix 3. Transfer Application
- 16.09-30 16 Sep _27 FAA Supplemental Affidavit
- 17.12-12 LoveWorks Academy Supplemental Affidavit Revised
- 17.12-12 Stonebridge World School Supplemental Affidavit Revised
- Escuela Exitos Air Table - Ready to Open May 19
- Gateway STEM Start-Up Checklist First Submission
- NE Polytechnic Start-up Checklist Partway Update

B.3 Measure: Contract Term, Negotiation and Execution

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

Performance Level Rating: Level 1-Approaching Satisfactory

Finding: Contracts clearly state the rights and responsibilities of the school and the authorizer, and are consistent across the portfolio of charter schools; however, contracts in the authorizer’s portfolio of charter schools do not consistently meet current statutory requirements.

- Contracts in the authorizer’s portfolio of charter schools do not consistently meet current statutory requirements. According to MDE, 100 percent of the new charter school contracts were statutorily compliant. Yet, of the sixteen renewal contracts submitted over the review term, thirteen were deemed non-compliant by MDE, including contracts for Jennings Community School (2019), Learning for Leadership Charter School (2017), Midway Star Academy (2018), Minnesota Internship Center (2019), Minnesota Math and Science Academy (2019) and Minnesota Transitions Academy (2018). As examples, the MDE contract compliance review rubric for Jennings Community School indicates that the contract was not compliant with Minnesota Statute 124E.10, Subd. 1(b) in that it does not include a closure plan that establishes who is responsible for providing parents of enrolled students with information and assistance to enable the student to re-enroll in another school. The MDE contract compliance review rubric for Minnesota Internship Center notes that the contract is not in compliance with Minnesota Statute 124E.10, Subd. 1(a)(4) in that the lottery policy does not include the required enrollment preference for foster children of an enrolled pupil’s parents or guardians as required by statute. The MDE contract compliance review rubric for Jennings Community School indicates non-compliance with Minnesota Statute 124E.10, Subd. 1(b) because the contract does not include statutory language regarding the transfer of student records to the resident district in the event of school closure. According to MDE’s Compliance Tracker, these issues have not been resolved to date. Of the five contracts submitted for change of authorizer, according to MDE, STRIDE Academy’s was not compliant per the rubric dated July 27, 2018 and a merger contract for Twin Cities International Schools was deemed non-compliant per the review rubric dated July 1, 2020. It should be noted that in its authorizer review and comment submission form, the authorizer noted, “PUC did everything within its power to ensure that the updated contract template was aligned to statute in order to bring all contracts into statutory compliance.”
- Contracts clearly state the rights and responsibilities of the school and the authorizer. Article II of the authorizer’s contract with its schools outlines the relationship between the school and PUC. Section 2.1 explains that PUC voluntarily exercises its powers to authorize charter schools. Section 2.2 describes the independent status of the school and specifically states that PUC shall have no authority or control over the operational, administrative or financial responsibility of the school. Section 2.4 explains that neither PUC nor the school have any authority to bind the other party into any contract or other agreement that would financially obligate the other party. Additionally, Article III of the contract outlines the role of the authorizer. Section 3.1 describes PUC’s responsibility to oversee the school’s academic, financial, operational, and student performance, including the school’s compliance with applicable law. Article IV explains the permitted activities of the school. Section 4.1 states that the school should act exclusively as a charter school and not undertake any action inconsistent with its status. Article VI explains the operating requirements of the school. Specifically, Section 6.1 describes the role of the school’s governing board in deciding matters related to the operation of the school, including budgeting, curriculum, and operating procedures. Section 6.2 discusses school board meeting requirements (e.g., open meeting law).

- The authorizer’s contracting practices are consistent across the authorizer’s portfolio of charter schools. A review of contracts between PUC and the schools within its portfolio shows that all of the contracts use the same template and therefore include the same roles and responsibilities in all contracts.

Key Evidence:

- B.3 Narrative
- AAA/AAP
- MAPES Compliance Data Spreadsheet – Pillsbury United Communities
- 19.09-27 PUC-JCS Renewal Contract Compliance Review Rubric
- 17.10-31 PUC-LLCS Renewal Contract Review Rubric
- 18.09-28 PUC-Dugsi Renewal Contract Review Rubric-Revised
- 19.09-27 PUC-MNIC Renewal Contract Compliance Review Rubric
- 19.09-27 PUC-MMSA Renewal Contract Compliance Review Rubric
- Example of Contract Amendment - AAP Alignment documents
- 16.12-06 El Colegio and PUC 2016-2021 Amendment-AAP Alignment
- 16.12-06 Jennings and PUC 2014-2018 Amendment-AAP Alignment
- 20.07-27 2020 PUC Contract AAP Alignment Details - Batch 2
- 17.08-30 2017 HSRA Contract Amended 2015-2019
- 16.12-06 MTCS and PUC 2016-2021 Amendment-AAP Alignment
- PUC Authorizer Review and Comment MAPES 2020

B.4 Measure: Performance Outcomes and Standards

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

Performance Level Rating: Level 1-Approaching Satisfactory

Finding: Contracts in the authorizer’s portfolio of charter schools meet current statutory performance standards and align with the performance standards in its AAP. However, performance outcomes and standards are not consistent across the portfolio of charter schools.

- Contracts in the authorizer’s portfolio of charter schools meet current statutory performance standards. All contracts include a performance evaluation (i.e., Levels of Achievement rubric) with specific academic, operational and financial criteria. These performance evaluation criteria are tied to weighting and points, which are also within the contract. Exhibit C of the contract includes performance goals that are academic (e.g., reading and math) and non-academic (e.g., fund balance). For example, the contract with El Colegio includes academic goals that state that 50 percent of scholars who pre- and post-test will meet or exceed their RIT Growth Projection on the NWEA Measures of Academic Progress in reading and math annually. The Horizon Science Academy Twin Cities (HSATC) contract includes both growth and proficiency goals for math, reading and science. Example: On the average of all MCA reading tests administered to students who are enrolled by October 1, the percentage of all students who are proficient (meet or exceed) will increase by at least 5 percent of the baseline score in spring 2019, and 5 percent of the previous year’s score each year thereafter. Exhibit E of the contract includes the governance, management and administration plan with expectations for operational performance, including compliance with Minnesota law and responsibilities tied to the day-to-day management of the school. Exhibit F of the contracts includes a financial management plan with expectations for financial oversight. For example, the contract states that schools will be financially viable and sustainable as measured by indicators including, but not limited to: fund balance, audit findings, proper use of public funds, appropriate financial systems, quality internal control processes, timely reporting, timely payment of invoices, percentage of funds dedicated to instruction, and other indicators included in PUC performance evaluations. Review of the performance evaluation shows specific measures (e.g., between 30-60 days cash and one-year trend is positive).
- As explained above, PUC’s contracts define clear, measurable and attainable academic, financial and operational performance outcomes and standards through its performance standards or Levels of Achievement. For example, academic standards include achievement, preparation, access, and belief. Operational standards include the educational program, governance, compliance and reporting. Financial standards encompass near-term measures, sustainability and overall financial management and oversight. Contract language indicates that it uses the performance framework annually to monitor a school’s performance in the three noted areas. The contract also states that it uses additional processes and procedures such as data reviews, site visits, board observations, and meetings to evaluate its schools. It explains that school performance in alignment with the framework will be considered in addition to other information during the renewal process. Finally, the contract includes a chart that lists a range of interventions and consequences in the event that schools do not meet academic, financial and organizational standards outlined in the contract.

- PUC’s performance standards and outcomes are consistent across the portfolio of charter schools. All contracts include PUC performance standards (i.e., Levels of Achievement), with specific academic, operational and financial criteria. A review of contracts confirmed that all schools undergo a QSR, a comprehensive evaluative process, as part of their renewal. Additionally, PUC and its schools create additional goals by which to measure individual school performance. For example, the contract for El Colegio states, “El Colegio will increase its fund balance on average throughout the duration of the charter contract by 5 percentage points from the baseline of -1.29 percent from the 2014-2015 school year.” According to the authorizer during the interview, it created the performance framework tool following the 2014 NACSA review in order to do internal comparisons schools within its portfolio. Yet, it explained that it is in the process of revising this performance framework (standards and template) as it has received feedback from its schools that completion of the template is onerous. School leaders confirmed this during their interview, stating that there are too many standards within the framework, making it an extremely time-consuming tool to complete. The authorizer explained that they are in the process of revising their standards and outcomes.
- Contracts align with the performance standards of its AAP. The contract template filed as an appendix to the AAP appear to have been used since that point, with some corrections along the way. This contract template was used in the execution of all reviewed contracts.
- The authorizer does not consistently hold charter schools accountable to academic, financial and operational performance outcomes and standards defined in the contract. For example, the 2020 contract between PUC and LoveWorks Academy for the Visual and Performing Arts shows that the school partially met its academic goals and did not meet its financial goal for 2018-2019 prior to its renewal. Furthermore, the authorizer notes areas of concern that include: growth goals are not reported on; special education is a subpopulation of immediate concern; and preparation data is very low. Yet, the contract does not include any contingencies that the school must meet to satisfy these areas of concern. Although Minnesota Transitions Charter School’s contract includes a rubric that tracks its academic and non-academic goals over the contract term, the rubric for Year 4 (2016-2017) is not complete or unclear. For example, there is no rating for Academic Goal #2 and Academic Goal #1 shows that both “goal met” and “goal currently not met” are checked. Additionally, a review of individual school contracts showed inconsistencies in the authorizer’s completion of the performance framework rubric.

Key Evidence:

- B.4 Narrative
- AAA/AAP
- 16.12-06 El Colegio and PUC 2016-2021 Amendment-AAP Alignment
- 16.12-06 RMSA and PUC 2015-2020 Amendment-AAP Alignment
- 17.11-08 HSATC Charter Contract Revised
- 19.07-01 19 Jul_1 MNOHS Contract Signed
- 20.06-30 Ubah Medical Academy Charter Contract
- 18.06-29 Dugsi Charter Contract
- 20.06-30 20 June_30 LoveWorks Academy Charter Contract
- 18.07-02 MTCS Contract

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 1-Approaching Satisfactory

Finding: Although the authorizer monitors and oversees the charter schools in areas of academics, operations and finances according to the contract and AAP, the process and related data monitoring systems are not clear.

- PUC does not have clear processes for oversight and monitoring. According to the authorizer's contract with its schools, it conducts a Quality School Review (QSR), a comprehensive evaluation process during which a charter school's performance is evaluated against its compliance with the authorizer-school contract, goals set forth in the contract and applicable law. During the QSR process, the school submits a QSR application; the authorizer conducts a site visit(s), which is followed by a QSR report; the school and authorizer meet to discuss the report; PUC's Advisory Council reviews the report and provides a recommendation for renewal or non-renewal; PUC's board approves the recommendation; and, if the school is approved for renewal, the contract is executed. According to the narrative, and as a review of oversight documents for Minnesota Internship Center (MNIC) confirms, the authorizer provides oversight in academics (annual review of publicly available data, contract goal reporting and performance framework reporting), operations (performance frameworks, annual site visits), financial performance (monthly review of financial statements, quarterly financial reports, performance framework, annual financial audit review), legal compliance (Epicenter reporting, annual reports, annual meetings with school and board chair), and school reporting (Epicenter). During the interviews with the authorizer and charter school leaders, participants also indicated that the authorizer conducts annual site visits separate from the QSR to monitor school performance. Yet, a review of contracts showed that there are multiple tools and processes being used by the authorizer to monitor its schools, including the performance framework, individual school goals, the QSR, annual site visits, and ongoing compliance reporting through Epicenter. Although the authorizer noted in the narrative that it clearly communicates which data pieces are utilized in contract renewal, during the interview, school leaders indicated that they are not always clear which data is being used (e.g., performance framework versus individual school goals). Additionally, during the interview, school leaders indicated that the oversight and monitoring tools and implementation are not clear, integrated and timely to promote continuous improvement. As previously noted, the authorizer indicated that it is in the process of revising its performance framework.
- The authorizer conducts charter oversight that competently evaluates academic, financial and operational performance and monitors compliance with applicable law. A review of contracts between the authorizer and its schools shows that all contracts include a performance framework (i.e., Levels of Achievement) for academic, financial and operational performance. Contracts also show that, in addition to the performance frameworks described above, they also include performance goals specific to each school. During the interview, the authorizer explained that these goals take precedence over the more generalized frameworks, especially when determining interventions, corrective actions and charter renewal. A review of documents for the Minnesota Internship Center shows that PUC collected monthly board packets and agendas, quarterly financial reports and annual report materials. Moreover, PUC conducted a website review, during which it found deficiencies, which it communicated to the school. Documentation shows that PUC reviewed documented submissions to Epicenter and collected financial audits for the school as well. In March of 2018, an annual check-in meeting agenda indicates that the authorizer and school met in order to review the school's annual report and goals, and to discuss their site visit.

- The authorizer’s oversight activities align with its stated oversight and monitoring processes in its AAA/AAP. PUC’s AAP points to the authorizer’s contract (Exhibit K: Ongoing Evaluation Criteria, Processes and Procedures) which states that the authorizer will evaluate schools in three primary areas: academics, finances and operations. The AAP (i.e., Appendix 12: Charter Contract Template) states that it will use the following process and procedures to conduct ongoing evaluation of its authorized schools: data review (e.g., state academic data, annual reports, budgets, financial audits); site visits; board meeting observations; performance evaluations; significant programmatic changes; and comprehensive evaluations (i.e., QSRs).
- The authorizer’s oversight and monitoring practices are generally consistent across the portfolio of charter schools. In the narrative, the authorizer states that it oversees and monitors schools through annual report reviews, Epicenter reporting, and site visits. Review of the Epicenter Timeline of Compliance Tasks shows that the authorizer has clear expectations for submission of documents such as monthly board meeting agendas and packets, annual reports, quarterly progress reports and quarterly financial statements. Moreover, a review of the authorizer’s contracts with its schools confirmed that it consistently conducts QSRs as part of the renewal process.

Key Evidence:

- B.5 Narrative
- AAA/AAP
- FY 2016 Annual Report – Pillsbury United Communities
- FY 2017 Annual Report – Pillsbury United Communities
- FY 2018 Annual Report – Pillsbury United Communities
- FY 2019 Annual Report – Pillsbury United Communities
- PUC School Contracts
- MNIC Oversight Example documents
- Appendix 12. Charter Contract Template
- MDE High-Quality Charter Schools 2016, 2017, 2018, 2019, 2020
- Authorizer interview, September 17, 2020
- Charter school leader interview, September 18, 2020

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

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

Performance Level Rating: Level 1-Approaching Satisfactory

Finding: While the authorizer has clear and comprehensive standards and processes to address complaints, intervention and corrective action, decisions and resulting actions are not being implemented consistently across the portfolio of charter schools.

- The authorizer implements clear and comprehensive standards and processes to address complaints, intervention and corrective action. PUC's Stakeholder Grievance Process document outlines the steps it will take to address complaints regarding its authorized schools, including: receipt of formal complaint; general acknowledgement of receipt of complaint; investigation or reasonable inquiry; and PUC response within 30 days of formal complaint with results of the reasonable inquiry. Additionally, Exhibit L of PUC's contract with its schools includes a range of possible interventions that the authorizer may take in the event that schools do not meet the expectations set forth in the contract. These include sending a letter of awareness; a notice of concern; a notice of deficiency; a notice of probationary status; starting a charter review; and charter revocation. Each of these levels has an explanation of what might trigger that particular intervention (e.g., failure to meet multiple performance targets) and what the result might be (e.g., letter from PUC to charter school board detailing areas of deficiency and/or a performance improvement plan).
- The authorizer's resulting actions are inconsistent across the portfolio of charter schools and do not consistently align with its stated standards and processes in its AAP. Review of complaints submitted to the authorizer shows that it did not consistently align with the Stakeholder Grievance Policy submitted as part of the AAP (Appendix 11). For example, review of a complaint submitted to the authorizer regarding Dugsi Academy (now Midway Star Academy), shows that while the authorizer received a second notice from the complainant on April 18, 2019 regarding outstanding invoices, there is not documented evidence that PUC provided the findings of a reasonable inquiry to the complainant, in alignment with its policy. PUC's response to the complainant on April 18, 2019 states that the authorizer "concluded [its] investigation into [the] complaint regarding allegations of outstanding payments..." and reports that "there is no further appropriate action the authorizer can take on this matter;" however, it does not summarize findings of its inquiry. In the narrative, the authorizer states that it was in contact with the complainant via phone as well as email; however, there is no additional documentation to confirm this. Additionally, on April 30, 2019, MDE contacted PUC via electronic letter regarding concerns about the fund balance of Dugsi Academy. In this letter, MDE listed complaints around past due payments to vendors, outstanding payments to TRA (retirement), and discrepancy in payroll (TrueNorth) exceeding approved amounts. On May 15, PUC responded to MDE, providing explanations on behalf of the school. The response also indicated that it submitted a notice of concern to the school on May 31, 2019 regarding the outstanding payments. (It should be noted that the notice of concern was submitted 15 days after the May 15, 2019 response to MDE.) In MDE's response on May 20, 2019, MDE notes that PUC did not follow its policy which includes communicating the results of its inquiry and any further steps to be taken by PUC or the school with the complainant.

Key Evidence:

- B.6 Narrative
- AAA/AAP
- FY 2016 Annual Report – Pillsbury United Communities
- FY 2017 Annual Report – Pillsbury United Communities
- FY 2018 Annual Report – Pillsbury United Communities
- FY 2019 Annual Report – Pillsbury United Communities
- 19.04-30 MDE Letter to PUC re Dugsi Complaint
- 19.05-31 Attachment 6 - Notice of Concern
- 10 Apr_25 PUC and QSR and New School Recap
- 19 Mar_22 Bruce Seal New School Application Review EE
- 19 Mar_25 Aaliyah Hodge New School Application Review EE
- 19 Mar_25 Adam McFarlane Review EE
- 19 Mar_31 Mohamed Abdurahman New School Application Review EE
- 19 May_1 Escuela Exitos Affidavit
- Escuela Exitos PUC follow up
- New School Application - Escuela Exitos - True North
- GSA-ConflictofInterest
- CSP Gateway Academy FINAL encrypted
- Gateway Flyer
- GSA-Enrollment&ApplicationPolicy
- GSA-Response
- Screen Shot 2018-06-23 at 10.08.49 AM

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 1-Approaching Satisfactory

Finding: Although the authorizer offers intentional assistance and development offerings, technical support is not consistently provided across the portfolio of charter schools.

- Support and technical assistance are proactive. According to the narrative and as the agendas confirm, the authorizer holds Monthly Charter School Directors' Meetings. Agendas show that these have taken place consistently over the term of the review, with topics including: Epicenter updates; review of performance frameworks; English language learners and special education; academics and behavior system analysis and discussion; being a strong leader; and general updates (e.g., changes to AAP). Additionally, agendas and session surveys show that PUC hosts Cohort Meetings that provide support to school representatives from similar areas (e.g., special education, deans and behavior specialists). In the narrative, and as school leaders confirmed during the interview, the authorizer provides networking opportunities among charter school leaders, both during the director's meetings and through informal connections. For example, an email from June 2017 shows that PUC connected representatives from Cedar Riverside Community School and Dugsi Academy.
- Support and technical assistance are provided in a variety of areas. As stated above, agendas from Monthly Charter School Director's Meetings and cohort meetings show that the authorizer provides technical assistance in a variety of areas including special education, behavior management, academics and compliance. Additionally, according to the narrative and as confirmed by a testimonial submitted by MNIC, PUC also worked with the Bush Foundation to provide training around personalized learning, in which four PUC schools participated in 2018-19.
- Support and technical assistance are provided in a manner that preserves school autonomy. According to the narrative and as interviews with both authorizer staff and charter school leaders confirmed, trainings and meetings are not mandatory, but are strongly encouraged by the authorizer. For example, they explained (and provided a copy of the PowerPoint presentation to confirm) that in the fall of 2019, PUC hosted a conference entitled Leading Forward: Building a Community of Changemakers. While most schools had representatives in attendance, at least one school opted out.
- Support and technical assistance are provided in a manner that is not consistent across the portfolio of charter schools. In the Charter School Leadership survey, 71 percent of respondents agreed that the authorizing staff provide quality technical assistance, while 29 percent disagreed or strongly disagreed. During the charter school leader interview, participants described varied experiences in the supports they receive from the authorizer. For example, while some participants described reaching out to the authorizer with questions and receiving support, others indicated that they generally do not receive responses from the authorizer when they ask for support. Participants also indicated that there are different needs depending on the leadership experience at the schools, but that trainings have not been differentiated to accommodate different levels of knowledge and/or experience. In the authorizer review and comment submission form, PUC noted that some of the requests for technical assistance may have fallen outside of its role as an authorizer, which is why these may not have been fulfilled.

Key Evidence:

- B.7 Narrative
- AAA/AAP
- FY 2016 Annual Report – Pillsbury United Communities
- FY 2017 Annual Report – Pillsbury United Communities
- FY 2018 Annual Report – Pillsbury United Communities
- FY 2019 Annual Report – Pillsbury United Communities
- 17 Jun_8 Email Connecting Dugsi and CRCS
- 20 Mar_19 COVID Follow-up and PD Opportunity
- 20 Sept_17 Email Connecting Mastery and SWS
- Cohort Meeting Materials
- Directors Meeting Follow-Up Emails (2017-2020)
- MNIC Bush Learning Journey Implementations
- Leading Forward Conference Program October 2019
- Authorizer interview, September 17, 2020
- Charter school leader interview, September 18, 2020
- PUC Authorizer Review and Comment MAPES 2020

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

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

Performance Level Rating: Level 4-Exemplary

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

- PUC has an intentional plan for successful model replication and dissemination of best practices, and models/practices have been identified. According to PUC’s AAP, the authorizer uses talks, conferences, site visits and other avenues to disseminate best practices. The AAP, the narrative and annual reports also describe how the authorizer uses the monthly directors’ meetings to bring together schools and share best practices. The authorizer’s annual reports state that it encourages schools that have strong academic achievement trend data to expand grade levels and/or sites, replicate their model, and disseminate best practices. The annual reports note that the monthly Charter School Directors’ Meetings provide opportunities to have conversations, share knowledge and build connections with high-performing programs. In the narrative, the authorizer also stated (and a conference program confirms) that the Leading Forward conference in October 2019 focused on building a community of changemakers. The program shows that the authorizer used the conference as a forum to bring external voices (i.e., outside of the portfolio and authorizer office) as well as internal perspectives (i.e., representatives from the authorizer and its schools) around best educational practices. As stated above, the authorizer also described encouraging some of its schools to participate in the Bush Foundation Personalized Learning Journey, to help expand best practices around personalized or individualized learning.
- One or more identified models/practices are moving toward replication/dissemination. In the narrative, and as interviews with the authorizer and charter school leaders confirmed, the authorizer discussed the grade expansion at Ubah Medical Academy, which is in process. Based on its consistent identification by MDE as a high-quality charter school (2016, 2017, 2018, 2020), the authorizer has been working with the school to expand its grades to include a middle school component. Additionally, both the authorizer and school representatives explained that, based on the aforementioned participation in the Bush Personalized Learning Journey, Minnesota Internship Center (MNIC) has incorporated individualized learning practices, including moving school locations to a more appropriate site and offering different professional development options for staff.
- PUC has worked with its schools to disseminate models and best practices. As noted above, Minnesota Internship Center (MNIC) has adopted personalized learning after participation in the Bush Personalized Learning Journey. Additionally, a letter from the Executive Director of Friendship Academy of the Arts, who, according to the authorizer also participated in the personalized learning journey, discusses that it will adopt individualized personalized learning at the school beginning in the fall of 2020. A screenshot of the school’s homepage states that the school provides “an individualized personalized high quality education.”

Key Evidence:

- B.8 Narrative
- AAA/AAP
- FY 2016 Annual Report – Pillsbury United Communities
- FY 2017 Annual Report – Pillsbury United Communities
- FY 2018 Annual Report – Pillsbury United Communities
- FY 2019 Annual Report – Pillsbury United Communities
- Leading Forward Conference Program October 2019
- MNIC Bush Learning Journey Implementations
- 19 Jan 10 Directors Agenda
- Friendship Academy of the Arts Website Screenshot - Personalized Learning
- New project-based learning high school opens at 22nd and Girard
- Ubah Expansion Materials
- Authorizer interview, September 17, 2020
- Charter school leader interview, September 18, 2020

B.9 Measure: Charter School Renewal and Termination Decisions

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

Performance Level Rating: Level 1-Approaching Satisfactory

Finding: Although the authorizer has comprehensive standards and processes to make high-stakes renewal and termination decisions, its practices do not consistently align to its stated standards and processes nor promote the growth of high-quality charter schools.

- The authorizer has transparent and rigorous standards and processes designed to use comprehensive academic, financial, operational and student performance data to make merit-based renewal decisions and terminate charters when necessary to protect student and public interests. The authorizer’s contract states: “In order to recommend a school for renewal, PUC-OPCS must determine that a school has met or is making reasonable progress toward pupil performance standards, meets accepted standards of fiscal management, meets governance and operations standards, and has not committed a material violation of its contract.” The contracts indicate, and the authorizer confirmed during the interview, that PUC uses QSR findings as well as achievement of their school-specific goals to assess schools’ overall performance and determine renewal decisions and termination.
- The authorizer’s decisions and resulting actions are aligned with the AAP. PUC’s AAP (Part B narrative) states that, “The renewal/ termination decisions are informed by the charter schools ability to meet charter contract academic and non-academic goals and indicators found in Appendix 12: Charter Contract Template, Exhibit K.” Review of Exhibit K: Ongoing Evaluation Criteria, Processes and Procedures indicates that the authorizer uses the following processes to evaluate its authorized schools: data review, regular site visits, board observations, meetings, performance evaluations, significant programmatic changes, and comprehensive evaluations (i.e., QSR). Exhibit K also states that schools will be evaluated on their progress toward meeting the academic and non-academic contractual goals. During the interview the authorizer indicated that it uses the performance framework to oversee and monitor schools’ annual performance in areas of academic, finances and operations. Review of renewal contracts confirmed that the authorizer completes a QSR as part of the renewal process.

- The authorizer’s decisions and resulting actions are not consistent across its portfolio of schools. A review of contracts shows that PUC’s renewed contracts include completed QSR reports that rate each school on a series of indicators in the areas of academics, governance, finance and operations and leadership. Based on the schools’ performance in each of these areas, the authorizer then determines whether a school will be renewed and, if so, the term of the contract. Each contract includes renewal recommendations and, if applicable, conditions for renewal (i.e., probationary measures to be met). For example, the 2020 contract with LoveWorks Academy for the Arts includes a renewal recommendation for three years, with the first year being probationary based on identified financial weaknesses. A review of the Minnesota Math and Science Academy’s contract from 2019 shows a renewal recommendation of three years. The authorizer justifies this because the school had performed well with respect to its goals. The recommendation notes that “there have been considerable challenges” surrounding the school’s finances and board operations, and Exhibit C of the contract includes academic and non-academic goals, including one around fiscal health. Furthermore, the renewal recommendation for Minnesota Transitions Charter School includes a condition that they must submit a report on what changes have been made to specific secondary programs no later than June 30, 2019. A QSR Report from July 2019 reflects the changes that the Minnesota Transitions Charter School put into place. However, review of renewed contracts shows that the authorizer does not consistently use the identified data as part of its renewal process. For example, Attachment B: Accountability Data in the most recent contract with Sojourner Truth Academy was not consistently completed for SY 2017-18 and SY 2018-2019, despite the contract being renewed in 2020. This attachment includes missing data for academic goals (growth and proficiency) in reading and math. During the interview with charter school leaders, some participants indicated that they are unclear as to how renewal contract terms are determined by the authorizer.

Key Evidence:

- B.9 Narrative
- AAA/AAP
- FY 2016 Annual Report – Pillsbury United Communities
- FY 2017 Annual Report – Pillsbury United Communities
- FY 2018 Annual Report – Pillsbury United Communities
- FY 2019 Annual Report – Pillsbury United Communities
- 19.07-01 19 Jul 1 MMSA Contract Signed
- 20.06-30 Sojourner Truth Academy Charter Contract
- 18.07-02 MTCS Contract
- 20.06-30 20 June 30 LoveWorks Academy Charter Contract

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

MAPES Performance Measures B Rating for Pillsbury United Communities is 1.20.

Performance Measures B: Rating Drivers

- PUC generally has comprehensive applications for new schools and existing schools interested in expanding that include evaluation criteria; however, they are not always wholly transparent, rigorous or aligned with the AAP.
- Although PUC's contracts with its schools contain clear performance standards, PUC has not consistently submitted contracts to MDE that are compliant nor consistently revised contracts that have been identified as non-compliant by MDE.
- PUC uses multiple tools and measures by which to oversee and monitor its schools, including a standard performance framework that is included in all contracts and individualized school-specific goals. Review of renewal contracts shows that the standard performance frameworks have been applied consistently across the portfolio of schools.
- PUC does not apply its renewal process consistently across its portfolio of schools. As mentioned previously, performance goals vary significantly across the portfolio, with some including financial and operational performance measures and others not. Furthermore, completed QSR reports within renewal contracts show that some measures were not completed thoroughly or did not reflect the school's performance, and yet schools received renewal contracts.

Performance Measures B: Recommendations

- In the new school application, draft a rubric that addresses the specific criteria in the application and define the rating levels more specifically to ensure consistency.
- Create specific criteria by which proposals for existing charter schools will be evaluated. Criteria should align with the specific sections of the application. Include rubrics that explicitly define rating levels to ensure consistency.
- Check that contracts meet current statutory requirements; institute a system by which to revise contracts that are deemed non-compliant in a timely manner.
- Review and revise PUC's oversight and monitoring process (e.g., performance framework, site visits) to better streamline the process. Specifically, implement one comprehensive performance framework to reduce redundancy and avoid confusion.
- Follow all aspects of the grievance policy, including conducting timely investigations when applicable and communicating the information back to the interested parties.
- Create ways in which to provide technical assistance to schools outside of conferences and meetings in order to share information more regularly and to ensure consistent access across the portfolio. Examples include newsletters and/or legal updates via email.
- Institute a renewal process and standards that are consistent across the portfolio of schools and ensure that all reviews of renewal applications are complete and thorough utilizing all applicable data.

Appendix A: Authorizer Portfolio Information

Operational Schools: Cedar Riverside Community School, El Colegio, Friendship Academy of the Arts, Gateway STEM Academy, High School for Recording Arts, Horizon Science Academy Twin Cities, Jennings Community School, LoveWorks Academy for Arts, Mastery School, Midway Star Academy, Minnesota Internship Center, Minnesota Math and Science Academy, Minnesota Online High School, Minnesota Transitions Charter School, Rochester Math and Science Academy, Sojourner Truth Academy, Stonebridge World School, STRIDE Academy, Twin Cities International Schools, Ubah Medical Academy

Preoperational Schools: Escuela Exitos

Closed Schools: Learning for Leadership Charter School

Never Opened Schools: Banaadir College Prep, Family Freedom Academy, Northeast Art and Science Polytechnic

Schools that have transferred into portfolio: Cedar Riverside Community School, El Colegio, Friendship Academy of the Arts, Mastery School, STRIDE Academy

Schools that have transferred out of portfolio: N/A

Merged schools over the term of the review period: Twin Cities International Elementary School

Appendix B: Evaluation Methodology

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

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

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