Date: January 2023

### **Evaluation Rubric**

Authorizer Name: State Charter School Commission of Georgia

Evaluator Name(s): Morgan Powell (NACSA) & Rich Haglund (RH3 Consulting)

SUMMARY	RATING
Category I. Authorizer Commitment & Capacity	
1. Human Resources	EX (3/3)
2. Financial Resources	AD (3/3)
Category II. The Petition Process	
3. Petition Application	EX (4/4)
4. Petition Review	EX (4/4)
5. Petition Decisions	EX (4/4)
Category III. Performance Contracting	
6. Pre-Opening Period	EX (4/4)
7. Performance Standards	EX (6/7)
8. Contract Terms and Agreements	EX (6/6)
9. Authorizer Obligations	EX (2/2)
Category IV. Oversight and Evaluation	
10. Compliance Monitoring	EX (5/5)
11. Intervention	EX (4/4)
12. Upholds Charter School Autonomy	EX (2/2)
Category V. Renewal and Termination	
13. Renewal Process	EX (4/4)
14. Renewal Decisions	EX (4/4)
15. Closure/Termination	EX (1/1)
OVERALL RATING	EX

OVERALL RATING CRITERIA	
Rating	Criteria
Needs Improvement (NI)	Earned a majority NI (8 or more) across all standards
Adequate (AD)	Earned any combination of ratings across standards expect as designated for NI or E
Exemplary (EX)	Earned a majority E (8 or more) and no NI across all standards
First Time Authorizer (FTA)	Charter authorizer in its first year of authorizing

# Category I. Authorizer Commitment & Capacity

Standard 1. Human Resources. The authorizer identifies appropriate personnel to carry out its authorizing obligations, including the point(s) of contact who will coordinate charter school support.

Evaluation Criteria	Documentation Review	Authorizer Debrief	School Survey	Met Criteria? (Y/N)
The authorizer has dedicated staff to supporting the charter schools in its portfolio.  Whether staff are dedicated solely to charter school authorizing or have other duties, sufficient staff time and resources are allocated for the authorizer to fulfill its obligations, in light of the number of schools in the portfolio.	Met. SCSC's dedication to charter school authorizing is clearly described on its website.  SCSC has 14 FTEs (including two openings) serving 41 schools serving 44,000 students. The staff to school ration of 1:3.4 compares well to national figures (49% of authorizers have fewer than five schools per FTE).	Current and open staff positions provide sufficient time and resources.	73% of respondents agreed that SCSC "has an adequate number of staff with relevant experience to carry out its duties."  Those who disagreed appreciated the knowledge and diligence of current staff but noted that more staff would help, particularly staff "with an education background rather than primarily policy and law." Because charter schools have to do more with less, one respondent asked for more practical assistance, such as professional development and operational support.	Y
Taken together, staff have adequate experience in charter authorizing or other relevant experience (e.g., education accountability, school funding and finance, education law and legal compliance).	Met. All the experience is relevant and useful, but current staff bios did not demonstrate expertise in governance, education finance, or data science on the current staff.	Staff recognize the benefits that would accrue from having someone on staff with charter or other operational experience. Currently open positions are intended to bring finance and facility expertise in-house. Current staff have data analysis expertise.	Several respondents noted the heavy legal and policy background of staff and 26% of respondents recommended SCSC add staff with more school or charter network experience. Adding that experience would be meaningful. It would reduce the gaps in understanding that sometimes appear between the SCSC and school leaders.	Y

Number of Criteria Met:	0-1	2	3	EX
	Needs Improvement (NI)	Adequate (AD)	Exemplary (EX)	Rating
The roles and responsibilities of the authorizing office cover key responsibilities in a coherent structure, specifically:  • Petition receipt and review, • Oversight of academic, financial, and operational performance, and • Designated point of contact for charter stakeholder inquiries.				
	<b>Met</b> . Desktop review suggests that the charter development team (2 FTEs) is responsible for assessing capacity, and legal oversees compliance in all areas.	SCSC division leaders were able to articulate the roles and responsibilities that		

- A lot of information regarding the staff can be found on the website and is generally easy to find.
- School leaders particularly appreciated the Commission leading "with openness, cooperation, and integrity."
- The Commission knows the expertise it wants to add internally.

Advanced Criteria	Strengths	Areas of Growth
The authorizer demonstrates its commitment to high-quality authorizing by building a healthy organization:  Organizational values (behavioral expectations) are explicit and enforced.  If applicable, authorizing is a visibly important function of the	The Mission and Vision of SCSC, which is solely focused on authorizing, are prominently displayed on its website. The strategic plan puts all of these items together and clearly demonstrates SCSC's commitment to the work and plans for the future. During interviews, staff noted that the mission drives their work.  The Director of Research & Development "researches and profiles promising practices and policies within charter schools, education reform efforts, and other related topics." The SCSC's research and evaluation efforts are referred to in other job descriptions, demonstrating the SCSC's desire for continuous	Explaining on the website the relationship between Commission staff, the Commissioners, and GaDOE could improve understanding and transparency.  SCSC could add the organizational qualities (benefits, expected behaviors, etc.) that will attract and retain effective employees to job descriptions and the website to improve
larger "parent" organization.	improvement.	efforts to recruit staff when needed.

Staffing supports the authorizer's goals and plans for the future.	Staff feel seen and valued as individuals with lives, rather than simply staff filling a specific job function.	
	Current staff expansion plans align to the organization's strategic plan.	
Employment and management practices attract and retain a diverse, effective team of authorizing professionals. This includes leadership and professional development, clear decision-making criteria, and effective onboarding.	During the site visit, multiple staff members mentioned that they have chosen to stay at the Commission because of the people they work with. "Compared to other agencies I've worked atdon't feel like we have to cut through a million pieces of red tape. I like that we operate with such flexibility". All staff members noted that the Executive Director was a strong leader. Some staff said she was the best boss they ever had.  Board members received manuals and procedures to learn their roles. Professional development is planned for staff and board members to support their authorizing functions. A set amount is budgeted for PD for each staff member, to be planned with their managers.	Page 12 of the strategic plan document indicated that SCSC is aware of the need to develop and maintain a strong internal foundation that aligns with and supports the SCSC's mission and vision. Some strategies noted include enhancing PD and other training opportunities for staff, developing intentional onboarding processes for new employees, and creating and maintaining appropriate organizational scaffolding to support work that aligns with the organization's mission and vision.  Staff noted that the board training is fairly basic. The PD schedule could be reviewed holistically, to ensure that staff and board members (new and existing) get sufficient training in authorizing, and support for their individual development goals.

Standard 2. Financial Resources. Pursuant to O.C.G.A. § 20-2-2068.1 and O.C.G.A. § 20-2-2089, the authorizer allocates the required financial resources to support charter schools, treats charter schools no less favorably than other local schools within the system unless otherwise provided by law, and provides transparency on the availability and allocation of charter school funding.

Evaluation Criteria	Documentation Review	Authorizer Debrief	School Survey	Met Criteria? (Y/N)
The authorizer clearly publishes and shares the calculation of current and anticipated public funding for each charter school in accordance with law, specifically:  • GaDOE/SBOE/SCSC- district allotment sheets  • Local Districts- allotment sheet itemizing the calculation of state, local and federal allocations to be provided.	Met. SCSC did provide district allotment sheets. These include state and local funding rates for districts in which schools will operate are provided. But the information on the website is outdated (2020). The Budget Narrative provided by SCSC shares the appropriate information. Allotment sheets are provided by SCSC staff for each school.  SCSC does not provide amounts or estimates, however, for federal programs such as Title funding and IDEA.	SCSC provides regular training on education finance. SCSC has created a beta site to clearly publish the calculations for each figure.	Respondents generally agreed but asked for advocacy with GaDOE and training for additional funding clarity. Schools would like to have more insight into DOE finance functions, since their funding depends on them. They want to know how the numbers in the allotment sheet are calculated. E.g., one respondent wrote, "We would like to know the detailed calculation of earned funding from the SCSC Supplement."  Some respondents also asked for SCSC to advocate for DOE to provide more transparent information about funding.	Y
Budget allocations for the school reflect an administrative fee that aligns with the charter contract and applicable law.	Met. The withhold calculation is spelled out in the Budget Proposal 2023: Administrative Withold – 2% schools 1% for first year schools. "As provided by OCGA § 20-2-2089(b), the SCSC is authorized to direct the Georgia Department of Education to withhold up to 3% of state earnings for state charter schools for the current fiscal year to allow the agency to perform its duties required by law." However, the actual amounts of withholds for individual schools	Per Morgan Felts - the evaluation notes that the actual itemized withhold amounts for schools are not made public or published. This is incorrect. We itemize the amounts and publish in our budget AND the amounts are broken out on every allotment sheet. NACSA indicated that our budget could be more prominent on our website, which I agree with.	N/A	Y

	are not included in budget allotments.			
The authorizer publishes a budget reflecting the total amount received from any authorizing fees and other sources, and how those funds are allocated internally. The authorizer publishes the administrative services provided based on the administrative fees withheld.	TBD. Revenue from schools, budgeted expenses, and services provided are in the Budget Narrative but that information is not published on the website.	Met. While the budget narrative was available online, it was in the September 2022 Meeting Minutes. Moving it to a more prominent location on the website would help stakeholders find this information more easily.	14/15 respondents agreed that SCSC meets this criterion.	Υ
	Needs Improvement (NI)	Adequate (AD)	Exemplary (EX)	Rating
Number of Criteria Met:	0-1	2	3	EX

- Other states require the publishing of itemized authorizer fees <u>Indiana</u> (see this example from <u>Ball State University</u>) and <u>Minnesota</u> being two states. NACSA has a colleague with direct experience creating these (David Greenberg) when he directed the authorizing work at Osprey Wilds in MN. You can find the reports <u>here underneath the Income and Expenditure Statements section</u> (the FY22 statement is <u>here</u>).
- How might the Commission improve processes to ensure that GaDOE staff that manage funding know when school actions affect funding (e.g., schools moving locations)? Staff mentioned that errors discovered may not be corrected until a full payment cycle is complete.

Advanced Criteria	Strengths	Areas of Growth
The authorizer's budget is sufficient and aligned to the authorizer's goals.	The adjustment of the withhold due to the pandemic aligns with the Mission and Vision of SCSC. 3% adjusted to 1.73% for existing schools and 1% adjusted to 0% for first year schools so that "this action allowed schools to offer additional instructional programs and supports to their students" (from Budget Narrative)  The State Charter Schools Foundation of Georgia (SCSF) is the charitable arm of the Commission and 100% of donations and grants go to program activities and schools. More detail in the Budget Narrative, however this demonstrates financial investment aligned to the authorizer's goals.  It appears that SCSC has a sufficient budget and is not functioning at a deficit for the recent and upcoming fiscal years – total expenditures \$5,123,08 (FY22) and \$6,000,531 (FY23) and total projected revenue = \$5,502,758 (FY22) and \$6,000,531 (FY23) Projected)	SCSC provides an explanation for the lower withhold for new schools. The explanation is rooted in ensuring that the schools can use funds to support start-up, however an argument can be made that schools need the most support and services during the first year. Therefore, existing schools are paying for the supports received from first year schools and may perceive this structure as inequitable.  If board members acquire more understanding of education funding generally, they may be able to better oversee the staff's provision of information and clarity to schools.

# Category II. The Petition Process

Standard 3. Petition Application. The authorizer publishes a written petition application in accordance with state requirements and timelines. The authorizer provides reasonable and timely technical assistance and is responsive to petitioner questions.

Evaluation Criteria	Documentation Review	Authorizer Debrief	School Survey	Met Criteria? (Y/N)
The authorizer publishes petition materials (application, timelines, process and guidance) online in an easy-to-find location.	Met. See <u>petitioner</u> resources page.	N/A	100% (9/9) of respondents agree to the following statement "Petition materials were posted on my authorizer's website in an easy to find location"	Y
The authorizer clearly articulates petition requirements. Requirements are focused on written content rather than form (i.e., application length, font size, etc.).	Met. See Petition Evaluation Guide.	N/A	87.5% (7/8) of respondents agree with the following statement "I was provided access to petition evaluation rubrics and had a sufficient understanding of what was required to have my application approved"	Y
The authorizer publishes times and locations for petition submission that are reasonable and easy to be met by the petitioner.	Met. See petition timeline & application.	N/A	100% (9/9) of respondents agreed with the following statement "Times and locations for petition submission were clearly stated, accessible and convenient."	Y
The authorizer publishes staff contact information for technical assistance.	Met. Staff contacts by topic are included on the website (e.g., petition timeline & application).	N/A	100% (9/9) of respondents agreed with the statement, "Staff were available to provide technical assistance."	Y
	Needs Improvement (NI)	Adequate (AD)	Exemplary (EX)	Rating
Number of Criteria Met:	0-1	2-3	4	EX

### **Evaluator Comments:**

• Support to petitions is an area where SCSC seems to excel. There is a ton of information available to those who want to start a charter school. Not only are the requirements clear but there are a ton of educational resources to support those who are not familiar with the process.

Advanced Criteria	Strengths	Areas of Growth
The authorizer conducts informational sessions about the petition process.	There are strong resources published on the petitioner resources page, including webinar materials. Resources are available here.	It would be beneficial for SCSC to post an RFP to expand options outside of the Atlanta region. This information would be helpful to inform the public. Talking through the petition process in informational sessions could also improve transparency and address the enrollment issues that SCSC has been experiencing.
The authorizer provides clear guidance around attendance possibilities (e.g., statewide, district, or other geographic limitations), funding structure for budget development, and requirements to align petitions to demonstrated community need.	Attendance possibilities and community need alignment support info is found here and covered in the petition review process part of the petitioner webinar.  Funding structure for budget development and a budget template are found here. A petition budget webinar is available to applicants to attend.	The <u>Start-Up Petition Instructions</u> were not available on SCSC's website. But these instructions contained the most concise and clear information about attendance possibilities and community need alignment. It would benefit SCSC to make this document publicly available.

Standard 4. Petition Review. The authorizer conducts petition review in accordance with state requirements. The petition review includes an evaluation team of no fewer than three individuals with diverse expertise, with at least one of the individuals having charter school experience. For the review of local charter petitions at least one of the individuals on the evaluation team shall have local district administrative experience.

Evaluation Criteria	Documentation Review	Authorizer Debrief	School Survey	Met Criteria? (Y/N)
The petition evaluation team includes at least three individuals that have varied and relevant skills and backgrounds (i.e., education, finance, school governance, charter experience, trained in petition review or have completed a relevant training).	Met.	Met. The petition review team has significant legal and policy expertise. They reach out to programmatic experts on the team as needed. While the team is still missing strong education finance and facilities knowledge, they regularly leverage experts as outside reviewers.	N/A	Υ
The authorizer publishes the petition evaluation criteria and the requirements for petition approval on the authorizer's website.	Met. See Petition Evaluation Guide.	N/A	87.5% (7/8) of respondents agreed with the statement, "I was provided access to petition evaluation rubrics and had a sufficient understanding of what was required to have my application approved"	Υ
The review process includes an interview.	Met. Timeline shown here. SCSC also provides Sample Interview Questions to petitioners	N/A	N/A	Υ
Petition review and interview process are free of conflict of interest.	Met.	N/A	100% (8/8) respondents agreed with the statement, "I believe the petition process was free from conflicts of interest."	Υ
	Needs Improvement (NI)	Adequate (AD)	Exemplary (EX)	Rating
Number of Criteria Met:	0-1	2-3	4	EX

Advanced Criteria	Strengths	Areas of Growth
The authorizer trains evaluators to ensure consistent application of petition evaluation criteria. Evaluators discuss ratings and develop a list of questions to inform the interview.	The team is open to implementing this in future cycles.	SCSC has started to formalize petition evaluations (e.g., with examples of poor and strong responses), but for now the process still assumes the expertise of reviewers is sufficient. It is recommended that SCSC establish and implement training for evaluators of petitions, including norming on ratings and interview question development.  Some additional questions for SCSC related to this advanced criterion:  How, when and by whom are evaluators trained?  What materials has SCSC preserved for continuity of orientation to the work of evaluation from year to year?  What is SCSC's process for grading and developing recommendations?

Standard 5. Petition Decisions. The authorizer grants charters only to petitioners that have demonstrated competence and capacity to succeed in all aspects of the school, including a strong plan for improving student opportunities and outcomes. The authorizer makes petition decisions that are free from conflicts of interest.

Evaluation Criteria	Documentation Review	Authorizer Debrief	School Survey	Met Criteria? (Y/N)
Authorization decisions are based on evidence tied to the petition evaluation criteria, applicable accountability metrics, and legal requirements.	<b>Met.</b> Recommendations for approval concisely address these requirements.	Met.	N/A	Y
If denied, petitioner is provided a written detailed description of deficiencies and information about how to reapply in the future.	TBD. Written recommendations provide detail for denial, however there is no information about how to reapply in the future.	Met. The law gives applicants opportunity to apply only during the following year. SCSC may also encourage the petitioner to apply to incubators.	N/A	Y
In the case of denied applications, the authorizer provides the applicant with detailed feedback to provide a public record of why the applicant was denied and assist the applicant if it wants to reapply in the future.	TBD. Written recommendations provide detail for denial. The feedback was shorter than the applicant desired. That's not necessarily a bad thing, though. There is no information about how to reapply in the future.	Met. Law gives opportunity to apply only during the following year. SCSC may also encourage the petitioner to apply to incubators.  Feedback is specifically tied to the evaluation categories.	N/A	Υ
Recommendations are shared with petitioners at least one week prior to the authorizing board meeting and within 90 days of receiving the complete application.	TBD. The timeline on the website indicates that recommendations to the board are made in June but the date petitioners are notified isn't specified. The date in June is not specified: petitions are due March 17, 2023, and decisions are made in June of that year which could be 90+ days.	The 90-day limit applies to local boards, not the Commission. The Commission has allowed decisions to linger at times but have an internal action by date of Dec. 31.	100% (8/8) of respondents agreed with the following statement, "My application recommendation was shared with me at least one week prior to the authorizing board's meeting and within 90 days of receiving the application."	Y (N/A)
	Needs Improvement (NI)	Adequate (AD)	Exemplary (EX)	Rating
Number of Criteria Met:	0-1	2-3	4	EX

Advanced Criteria	Strengths	Areas of Growth
<ul> <li>Application decisions reflect rigorous consideration of the following:         <ul> <li>The educational program's likelihood of success and the applicants' capacity for educating children well,</li> <li>The business and organizational plans' viability,</li> <li>The experience and capacity of the applicant team (board and proposed leaders) to implement the proposed educational, business, and organizational program, and to manage any service provider contracts.</li> </ul> </li> </ul>	SCSC is consistently reflecting on ways to improve the processes. The open-ended nature of the petition evaluation form opens the door to rigor but is dependent upon the evaluator's ability to provide a substantive review of the petition.	
The authorizer board's decisions generally align with staff recommendations. Conditional approvals are only granted for making specific technical changes and not as a means to allow the applicants to further develop proposals.	Generally, yes. The authorizer data summary indicates alignment of the staff recommendation and the final decision. Staff and board members recognize the tension in this area. The Commission staff appear to have a good relationship with the board which is a tremendous strength.	Commissioners and staff may benefit from a review of the factors that affect staff recommendations and the ultimate decisions by commissioners. Instances when the Commission votes contrary to staff recommendations provide opportunities for a review of the strategic direction of the Commission. Such reviews can productively inform future staff recommendations and foster increased understanding.

# Category III. Performance Contracting

Standard 6. Pre-Opening Period. The authorizer establishes clear and necessary, but not overly burdensome expectations for the pre-opening period including, but not limited to, expectations regarding facilities, student enrollment and board development.

Evaluation Criteria	Documentation Review	Authorizer Debrief	School Survey	Met Criteria? (Y/N)
The authorizer has a pre-opening checklist or other process that clearly communicates to schools what key readiness requirements must be met to open.  The checklist or process includes adequate timelines, deliverables, responsible parties, and notes which criteria may defer opening.	<b>Met.</b> The pre-opening <u>checklist</u> and <u>guidance</u> address these criteria.	N/A	50% (1/2) of respondents agreed with the following statements: "Pre-opening expectations were clearly outlined to include timelines, deliverables, and responsible parties and establish criteria which may trigger a deferred opening. "	Y
Pre-opening expectations specify facility requirements that include, GaDOE Facilities Division sign off, obtaining a Certificate of Occupancy and submitting an Emergency Plan to required agencies.	<b>Met</b> . The pre-opening <u>checklist</u> and <u>guidance</u> address these criteria.	N/A	N/A	Y
Pre-opening expectations specify student enrollment requirements including a minimum and maximum threshold to operate.	Met. The pre-opening checklist scaffolds enrollment expectations over time – 50% by April 28 <sup>th</sup> , 85% by May 17. The maximum is outlined in the contract (Section 3).	N/A	N/A	Y
Pre-opening expectations specify board development requirements including required trainings, policy development and operational oversight procedures.	<b>Met.</b> The pre-opening <u>checklist</u> addresses all these criteria.	N/A	N/A	Y
	Needs Improvement (NI)	Adequate (AD)	Exemplary (EX)	Rating
Number of Criteria Met:	0-1	2-3	4	EX

### **Evaluator Comments:**

• The pre-opening guidance on facilities – aligned to school design, etc. – are excellent.

Advanced Criteria	Strengths	Areas of Growth
	There are lots of required trainings at which SCSC staff and school leadership have the opportunity to develop	SCSC could consider publishing the resources that are available to schools I.e., contact information to the
	relationships.	Georgia Charter School Association, implementation

The authorizer uses the pre-opening process to build relationships, set expectations for school performance, and provide technical assistance to schools.	Relationships between schools and SCSC are evident because schools reach out to SCSC when support is needed. SCSC responds to compliance questions and will point schools to the Georgia Charter School Association when the support falls outside of SCSC's realm. SCSC also offers to serve as a liaison between GaDOE if and when schools are not getting answers from them.  During the interview process it was mentioned that more schools are wanting "hand-holding" and as a result, SCSC is considering making more model	support specialist information, Facility Resource Center etc. This recommendation comes with the understanding that some schools have access to different supports and therefore not all information is being shared publicly for that reason.
	policies/rules. SCSC remains wary doing this as it may infringe upon autonomies.	
Is there a history of schools opening despite not meeting all of the pre-opening requirements? If so, why?	Yes. There was one school, however the circumstances were unique due to the COVID-19 pandemic. Note that for now, SCSC has not made pre-opening checklist compliance strict. Instead, it has been guidance for success.	SCSC should communicate its approach here and distinguish – particularly for school boards – between what will make the school successful and what, if done/not done, will cause SCSC to prevent the school from opening.  During an interview and in reference to start-up delays due to enrollment, staff explained, "Schools now know – because of the four deferrals in 2021-22 – that SCSC takes enrollment seriously". This indicated that the expectations could be clearer around enrollment and impact on school opening if enrollment requirements aren't met.
Is there a history of schools not opening on time? If so, why?	The two reasons for schools not opening on time are facility and enrollment issues. SCSC recognizes the challenges faced by schools and the connection to the pre-opening requirements, GaDOE deadlines, and facility stakeholders needs. SCSC is exploring a unified enrollment system to alleviate some of these issues.  A few notes from our site visit interviews- Authorized schools spending inordinate amount of time first finding facility. Rarely end up opening with facility possibilities or locations initially proposed. Solving that lack of a viable facility takes 100% of school leaders' time, strains the board, and prevents them from communicating with families to recruit students. The	SCSC could add more training on the different responsibilities of boards in startup and maintenance modes, to reduce capacity issues that may prevent schools from opening on time.

	don't have places to drop off enrollment packets, they're waiting to market to the community, etc.	
	SCSC has also recognized that the deeper issue may be due to unengaged boards. Some schools leverage significant financial resources that they have during pre-opening and hire a consultant to manage start-up operations. As a result, board members are less engaged in the process and school leaders are surprised when opening needs to be delayed.	
	SCSC demonstrates a deep awareness of the issues at hand and an investment in trying to find solutions that support schools while also ensuring they have autonomy.	
In cases where a school's opening was delayed, did the authorizer make the decision early enough so that students and parents could make other arrangements?	Yes – decisions are made 6 months or so before school starts. SCSC recognizes the challenges faced by schools and the connection to the pre-opening requirements, GaDOE deadlines, and facility stakeholders needs. SCSC is exploring a unified enrollment system to alleviate some of these issues.	The timing of deferral decisions and petitioner understanding of pre-opening expectations may benefit from a review for improved outcomes in the future.

Standard 7. Performance Standards. The authorizer, through the performance contract, establishes high academic, financial, and operational performance standards under which schools will be evaluated, using objective and verifiable measures of student achievement and growth as the primary measure of school quality.

Evaluation Criteria	Documentation Review	Authorizer Debrief	School Survey	Met Criteria? (Y/N)
Performance standards are included or referenced in the performance contract. These include clearly defined targets, thresholds or goals for each evaluation measure.	<b>Met</b> . Section 9 of the contract incorporates these standards.	N/A	100% (15/15) of respondents agreed with the statement, "The performance targets, thresholds or goals for my school are clearly defined within the charter contract and allow for annual evaluation"	Y
Evaluation measures allow for annual review.	Met.	N/A	N/A	Y
Data sources used to evaluate performance are objective and verifiable.	<b>Met.</b> Data sources identified in the <a href="CPF">CPF</a> which is referenced in the contract.	N/A	N/A	Υ
The authorizer measures academic performance using a framework that includes clearly defined expectations for:  • Student achievement • Student progress measures  Expectations consider ALL students, including students with special needs, students with disabilities, and English Learners.	Met. These are included in the performance framework and the GA school performance calculations.	N/A	100% (15/15) of respondents agreed with the statement, "The academic performance standards in my charter contract include both student achievement and student progress measures."	Y
Financial, operational and governance standards are grounded in best practice. Standards in these areas that are in addition to legal requirements are reasonable and not overly burdensome.	Met.	N/A	N/A	Y
The authorizer measures financial performance standards that enable the authorizer to assess and monitor schools' financial viability. These include clearly defined metric and targets to assess near-term performance and long-term financial sustainability.	TBD SCSC uses defined metrics and targets, but some schools have still suffered from long-term financial instability despite meeting those targets.	NO During initial conversations with SCSC staff mentioned that schools are meeting all financial expectations as outlined in the	N/A	N

		performance framework but aren't always financially successful over the long-term. See the comment section for more information.		
Operational standards include measures in the following areas: educational program compliance, financial oversight, governance and transparency, protecting the rights of students and employees, and ensuring a safe school environment.	Met. See Section III of PF.	N/A	N/A	Y
	Needs Improvement (NI)	Adequate (AD)	Exemplary (EX)	Rating
Number of Criteria Met:	0-2	3-5	6-7	EX

- 92% (11/12) of school respondents agreed with the following statement: "If changes, beyond what is captured in state law, occur to the performance expectations of my school, I am adequately notified through agreement via a charter contract amendment or I am given at least one year's notice before the change goes into effect." The one individual who disagreed with this statement added the following comment "Again, I do not feel it is the SCSC's fault that we were not informed of changes in performance expectations, but rather the DOE in dragging on making changes to CCRPI due to COVID."
- The criterion related to assessing financial viability during site visit interviews the question "How does the Commission assess overall financial risk?" solicited the following response "Our sole resource for financial viability is the independent audit. If anything doesn't come about in the audit, then we aren't holding schools to it...There is still something that we're missing. We've had schools that have a clean audit but underlying there are issues such as fraud and lack of checks and balances in place. They may have lost points in the operations section but that is so large that it doesn't become a red flag. We've acknowledged the issue and trying to figure out a better way for it."

Advanced Criteria	Strengths	Areas of Growth
The authorizer reviews financial data and determines, based on the circumstances of each school, whether the school presents a low, medium, or high risk for financial failure. This includes assessing whether the school maintains and implements compliant policies and procedures for expending state and federal funds and maintains an appropriate and legally compliant level of transparency regarding budgeting and finance.	The COO serves as the lead for reviewing financial data and flagging schools that are at risk for financial failure. The COO makes a concerted effort to train others to conduct budget reviews. SCSC plans to hire financial accountability manager to help in this area.  Indirectly related: SCSC connects schools to implementation support specialists if needed (paid for by the Association).	In addition to operations leadership, the COO serves as the financial accountability manager. There does not appear to be a succession plan in case the COO were to leave the Commission. SCSC has tried to hire a financial accountability manager and has not been successful yet in filling that position. SCSC could consider trying to leverage Commissioners who have this expertise while they try to hire.  It appears SCSC only measures near and long-term criteria in the performance framework but not an

		overall risk rating. This may be a beneficial practice to incorporate.  As noted in the evaluator comment section, SCSC relies on audits but recognizes some schools that had clean audits have failed. SCSC is trying to figure out how to spot any leading indicators that don't show up in audits.
<ul> <li>Adhere to applicable open meetings and records requirements.</li> <li>Maintain compliant policies and procedures for serving special student populations, including students with disabilities and those identified as gifted, experiencing homelessness, or as English Learners (EL).</li> <li>Adhere to the requirements of the charter contracts and applicable education laws, rules, and regulations.</li> </ul>	Met. The Core Performance Framework addresses and scores schools - see Measures 1c, 1d, 3b. SCSC monitors yearly for compliance – website audits, attendance at board meetings (contracted), meeting minutes, requests to schools. If SCSC receives a complaint in the year, they conduct their own investigation and ask the school to remedy the issue if there is a finding.	

Standard 8. Contract Terms and Agreements. The authorizer executes an initial contract for a term of five years that clearly outlines the rights and responsibilities of the school and the authorizer. Agreements related to funding or in-kind services not required by OGGA §20-2-2068.1 or §20-2-2089 or that are not included in the charter contract, must be negotiated and executed in writing and signed by the local authorizer and charter school (for local charter schools) or the State Charter SchoolsCommission and state charter school (for state charter schools).

Evaluation Criteria	Documentation Review	Authorizer Debrief	School Survey	Met Criteria? (Y/N)
Executes a contract with a legally incorporated, nonprofit governing board independent of the authorizer	Met.	N/A	N/A	Υ
Initial contract terms are five years as stated in SBOE rule 160-4-905	Met. See p. 2 of sample contract.	N/A	N/A	Y
The performance contract_details the rights and responsibilities of each party regarding school autonomy, funding, oversight, performance measures, and consequences for not meeting performance measures and material terms.	Met.	N/A	N/A	Y
The authorizer provides adequate and appropriate guidance to schools regarding what kinds of programmatic or operational changes constitute material changes that require authorizer approval.	Met.	N/A	N/A	Y
Specific services provided by the authorizer are negotiated and agreed to by both parties and are outlined in a separate written contract or service agreement, if applicable.	Not applicable for the Commission. Schools are their own LEA.	Not applicable for the Commission. Schools are their own LEA.	N/A	Y N/A
Contract and/or related agreements establish equitable per-pupil funding terms or amounts as required by state law.	Met.	N/A	100% (14/14) respondents agreed with the following statement "My authorizer has provided my school equitable per- pupil funding as prescribed under the law"	Y
	Needs Improvement (NI)	Adequate (AD)	Exemplary (EX)	Rating
Number of Criteria Met:	0-2	3-4	5-6	EX

ator Comments:
The contract pushes for best practices. See, e.g., requirement that CFO (employee or contract) have at least 10 years of experience (p. 9); also see requirement that i board meets on less than 24 hours' notice, it provides notice to the Commission's ED (p. 6).

Standard 9. Authorizer Obligations. The authorizer follows all authorizing obligations outlined in law, State Board Rule, and the charter contract.

Evaluation Criteria	Documentation Review	Authorizer Debrief	School Survey	Met Criteria? (Y/N)
The authorizer's contracts include or refer to the state and federal laws and other legal requirements the school must meet.	Met.	N/A	N/A	Υ
A local board of education authorizer makes unused facilities (as defined by 20-2-2068.2 (h)(2)) available to local charters. The SCSC follows guidelines from the state properties commission.	N/A	N/A	N/A	N/A
	Needs Improvement (NI)	Adequate (AD)	Exemplary (EX)	Rating
Number of Criteria Met:	0	1	2	EX

Advanced Criteria	Strengths	Areas of Growth
The authorizer publicly posts a current list of unused facilities concurrently with the regular charter petition process.	N/A	N/A

## Category IV. Oversight and Evaluation

Standard 10. Compliance Monitoring. The authorizer protects the public interest and holds charter schools accountable for their obligations of governance, management, and oversight of public funds. The authorizer defines, communicates, and effectively implements the processes, methods, and timing of collecting and reporting school performance and compliance information. The authorizer conducts school visits as appropriate and necessary, and annually publishes school performance data.

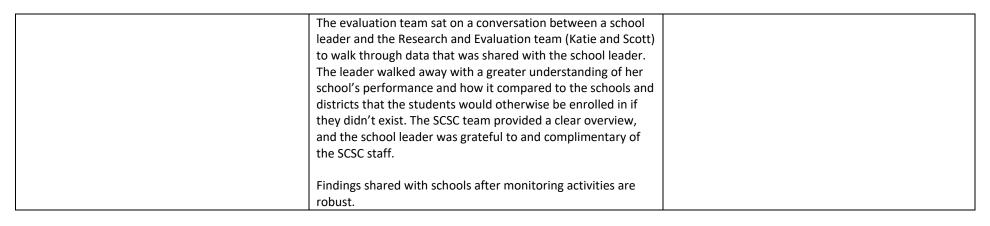
Evaluation Criteria	Documentation Review	Authorizer Debrief	School Survey	Met Criteria? (Y/N)
The authorizer has a documented process for oversight and evaluation that aligns with the provisions of the performance contract.	<b>Met</b> . The process is outlined <u>online</u> and detailed in the <u>Monitoring Handbook</u> .	N/A	N/A	Y
The authorizer has a documented process for conducting school site visits that includes a review of school performance and compliance in alignment with the contract, and/or subsequent agreements.	<b>Met</b> . The Monitoring Handbook includes an overview and exemplary guidance for schools to prepare for reviews, which are documented in Monitoring Results.	The Health and Safety Facility Visit Checklist and Monitoring Results demonstrate what evaluators look for on these visits.	N/A	Y
The authorizer clearly communicates its oversight processes, including site visits, and how information gleaned from those activities is used to hold schools accountable.	Met. These are detailed on p. 3 of the Monitoring Handbook.	N/A	Respondents agreed.	Y
The authorizer conducts an on-site visit to each charter school at least once during the school's charter term.	Met. The website states that SCSC conducts "onsite and virtual monitoring," here [emphasis added]. State law does not require onsite monitoring. SCSC determines whether the required annual monitoring will be onsite or online based upon criteria (see pg. 4 of the Monitoring Handbook and SCSC's Comprehensive Review Guidance. The website should be revised to align with practice.	Met. SCSC confirmed that site visits are conducted at least once during the school's charter term. They used to conduct one visit each school year but adjusted. Virtual visits include website monitoring activities.	N/A	Y
Each year, the authorizer publishes a report on its website with individual and aggregate level school performance results based on evaluation measures included in the contracts, comparing academic,	Met. Comprehensive performance info. Is posted for each school online. Academic Accountability report and Accountability Presentation (2020-21) provide aggregate information.	N/A	Respondents agreed.	Y

financial, and organizational performance of each school to established expectations.				
	Needs Improvement (NI)	Adequate (AD)	Exemplary (EX)	Rating
Number of Criteria Met:	0-2	3	4-5	EX

### **Evaluator Comments:**

• Each school has mission specific goals listed in the contract; however, this information is not published on the website. It may be an opportunity for increased transparency and in support of choice.

Advanced Criteria	Strengths	Areas of Growth
The authorizer knows, at any given time, how a school is doing.	SCSC knows, generally, how each school is doing. Regular staff meetings include a review of any hot button issues at each school, using an Excel document for tracking.	SCSC recognizes the value of creating a better source than Excel that can serve as a single source of current, accurate school information and performance data.  One of SCSC's newest team members has experience moving from Excel to such a system; SCSC plans to leverage her expertise.
The authorizer provides clear technical assistance to schools to ensure timely compliance with new or revised laws.	The Leadership Advisory Program is offered to struggling schools to get support. SCSC believes that it is appropriate for the staff to identify needed improvements but not to dictate how to make them.  SCSC typically connects schools with specialists or directs them to the Association, so that any support is provided independent from the SCSC.	
The authorizer differentiates its oversight to ensure that time and resources are allocated effectively based on school performance and capacity, as well as the authorizer's goals.	The Monitoring Handbook describes how and why visits occur and how oversight is differentiated.	
Site visits are structured in a way that enables the authorizer to gather the information needed to evaluate the school appropriately and that respects school autonomy.	The evaluation process and any site visits are designed around data collected throughout the year. Site visits typically focus on health and safety. There is a checklist associated with this to help guide the evaluator in assessing on-site.	Site visits are an opportunity to observe teaching and learning and to assess whether the physical environment of the school matches what was promised to students and families. The site visit does not seem to assess this.
School leaders understand their performance status.	School survey respondents agreed with this statement.	



Standard 11. Intervention. The authorizer gives schools evidence-based, and timely notice of contract violations or performance deficiencies and allows schools reasonable time and opportunity for remediation.

Evaluation Criteria	Documentation Review	Authorizer Debrief	School Survey	Met Criteria? (Y/N)
The authorizer has an intervention protocol which determines when it may intervene and what consequences are possible (from a conversation to probation or other more serious actions). The intervention protocol includes actions that result from annual reviews using the performance framework and interventions required outside of "normal" monitoring findings (i.e., parent phone calls). This protocol is clearly communicated to schools.	Met. Intervention protocols are outlined in the Comprehensive Review Guidance and in the Monitoring Handbook (see page 7 in both documents).  The Monitoring Handbook describes the protocol and includes unannounced visits as a possibility.	In addition to the items listed under the document review. SCSC conducts a pre-monitoring webinar that explains what to submit ahead of time, what the basis is for monitoring, etc.  Published documents do not describe the protocol for interventions that may occur outside of "normal" monitoring findings (i.e., parent phone calls). SCSC staff described the process clearly, however.	N/A	Y
Following each compliance site visit the authorizer provides timely written notification that includes information collected during the site visit, a summary of findings and areas needing improvement. The findings are tied directly to applicable law or contract requirements.	Met. The feedback provided is outlined in the Monitoring Handbook beginning on page 7.  Example post-visit letters were shared. They are similar to audit reports with clear explanations of findings and processes.	Results are shared by the end of the year. There is a two week appeal window. Within six weeks of a monitoring visit, schools have a chance to "win back" some points by remedying findings.	All respondents agreed with the following statement "Following each compliance site visit my authorizer provided a written notification that included information collected during the site visit and a summary of findings that are tied directly to applicable law or contract requirements"	Y
The authorizer provides written notice to the school of any contract breaches or areas of noncompliance in a reasonable timeframe.	Met.	Met. SCSC communicates contract breaches based on how the information about that breach was received. If there is a complaint, SCSC begins its own investigation. Once a finding is made, SCSC communicates as soon as possible.	Respondents agreed.	Y

The authorizer allows the school adequate time to remedy any identified areas of noncompliance, respecting the school's autonomy to determine how to remediate the noncompliance, when appropriate.	<b>Met</b> . A letter sent January 31, 2022, requires CAP submission by April 25 <sup>th</sup> which seems reasonable. The proposed action(s) to remedy the finding or adverse practice is not prescriptive and leaves room for schools to determine how to remediate (when appropriate) For example, SCSC does not suggest specific language.	Results are shared by the end of the year. There is a two week appeal window. Within six weeks of the visit, schools have a chance to "win back" some points by remedying findings. It was mentioned that SCSC received feedback that they were too prescriptive so now they have adjusted language to say schools need to take reasonable efforts tailored to the issue.	Respondents agreed.	Y
	Needs Improvement (Ni)	Adequate (AD)	Exemplary (EX)	Rating
Number of Criteria Met:	0-1	2	3-4	EX

### **Evaluator Comments:**

• The website should be reviewed for current points of contact. E.g., the contact for monitoring documents listed Sarah Beck, who doesn't appear to be on staff anymore.

Standard 12. Upholds Charter School Autonomy. The authorizer upholds charter school autonomy in school level governance, including personnel decisions, financial decisions, curriculum and instruction, resource allocation, establishing and monitoring the achievement of school improvement goals, and school operations.

Evaluation Criteria	Documentation Review	Authorizer Debrief	School Survey	Met Criteria? (Y/N)
The contract and the authorizer's practices recognize the school's autonomy in school governance, instructional program implementation, personnel, and budgeting.	Met. The school's autonomy is recognized generally in Section 7 of each contract. Specific details regarding autonomy and compliance requirements are addressed relative to governance (Section 14), instructional program implementation (Section 9), personnel (Section 20, and budgeting (Section 15).			Y
Specific requirements not otherwise required under state law are either included in the charter contract or charter schools are <i>notified at least one year prior</i> to the requirement going into effect.	<b>Met</b> . The contract adds requirements not based in law (e.g., a CFO with 10 years of experience), as does the performance framework.	SCSC has a process for assessing new requirements, determining next steps, and communicating to schools.		Y
	Needs Improvement	Adequate	Exemplary	
Number of Criteria Met:	0	1	2	EX

#### **Evaluator Comments:**

• Before new requirements are imposed upon schools, staff have a sound process to determine necessity, format (in rule, policy, contract or practice) and timing, including discussion with Commissioners. Schools notified in advance. For non-rule based changes, SCSC would like to establish some comment opportunity for schools, so Commission makes decisions with more on the ground understanding.

# Category V. Renewal and Termination

Standard 13. Renewal and Termination Process. The authorizer clearly communicates to schools the criteria for charter termination, renewal and non-renewal that are consistent with the terms of the charter contract. The renewal process includes a written application and an opportunity for an interview.

Evaluation Criteria	Documentation Review	Authorizer Debrief	School Survey	Met Criteria? (Y/N)
Renewal process, criteria, and a general timeline are clearly communicated to schools well in advance of renewal and are published in a publicly accessible location. The process includes a written renewal application and an opportunity interview to make factual corrections or present supplementary evidence of performance.	Met. The renewal process, criteria, and timeline are all available in the Renewal Guidance, which is publicly available here. The outline of interviews during the renewal process doesn't indicate if and when factual corrections or supplementary evidence of performance can be provided. It notes that applicants are able to submit an optional narrative which is supplementary but not factual corrections.	Schools have an opportunity to submit factual corrections or supplementary evidence of performance. Staff explained that schools have two to three weeks after the application is filed (up to the time a staff recommendation is issued) to talk with SCSC and provide feedback. This open process usually lasts four weeks.	Respondents agreed.	Y
Renewal criteria are transparent, specific and align to performance standards and expectations outlined in the charter contract.	<b>Met</b> . Renewal criteria are part of the require reporting in the Performance Framework.		Respondents agreed.	Y
The authorizer uses a track record of performance over multiple years to make renewal determinations.	<b>Met</b> . This was demonstrated clearly on pages. 4 and 5 of <u>Renewal Guidance</u> .		Respondents agreed.	Y
Revocation criteria are clearly communicated to schools.  The authorizer provides written warning, timeline, and notice of anticipated termination prior to the end of the charter school renewal period.	YES/NO Revocation criteria are written in the contract (Sections 2 – 5). And a list of schools that were non-renewed, revoked, or surrendered was provided. Based on the information provided in the desk audit, however, it is unclear how schools are notified about closure.	Met. SCSC noted that timing of renewal or revocation decisions is affected by the most recent data release that can be relied upon for making such decisions. SCSC is considering incorporating the possibility of a probation period as another way to ensure schools are aware if they are at greater risk of non-renewal.	N/A	Y
	Needs Improvement	Adequate	Exemplary	Rating

Number of Criteria Met:	0-1	2-3	4	EX
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- Despite a majority of positive comments on the renewal process from schools, some expressed feeling prosecuted instead of supported, or that the Commission was "out to get them" instead of "here to help them."
- Another respondent requested more clarity on the Commission's role: "a bit more clarity on how much support an authorizer should/will give to help charters meet goals in addition to evaluating progress toward the goal." That may be an opportunity to overcommunicate the different roles of the Commission, the association, and the foundation.

Advanced Criteria	Strengths	Areas of Growth
Expansion and Replication The authorizer communicates clear processes, criteria, and standards for expansion and replication,	A replication application exists as noted on the website section <u>"Replicate a Charter School" here.</u> Petitioners will receive an expedited process. There is a SCSC point of contact listed.	SCSC could consider making this application publicly available and provide more information around how an applicant can be successful in its request.
so schools know when such applications are likely to be successful.	SCSC has developed a grade band policy to improve this process.	New Commission board members and school board members should be oriented to this.

Standard 14. Renewal Decisions. The authorizer bases renewal decisions on a thorough analyses of the criteria outlined in the charter contract, with objective and verifiable measures of student achievement and growth as the primary measure of school quality. The authorizer ensures the renewal decision-making processes are free of conflicts of interest. The authorizer communicates renewal decisions to the school community and public within a timeframe that allows parents and students to exercise choices for the coming school year.

Evaluation Criteria	Documentation Review	Authorizer Debrief	School Survey	Met Criteria? (Y/N)
Renewal/nonrenewal recommendations are provided through prompt, written notification to the school's governing board and the public within a reasonable timeframe, following the availability of necessary data, as to provide parents and students time to exercise choices for the upcoming school year.	<b>Met</b> . The <u>Closure Guide</u> notes that parents and families should be notified within one week of the suspension/closure decision.	Sample communications to families were shared. These include multiple dates for SCSC-hosted family meetings to assist with the transition. FAQ sheet.	N/A	Y
Standard (5-year) renewal terms are only granted to schools that met established performance expectations outlined in the charter contract.	Met. The document review demonstrated this. Some schools have received abbreviated renewal terms – typically three years, and one for two. All recent renewals for the 2020 cycle provide the rationale which is typically not meeting financial expectations. Recommendations for the 2022 cycle are more detailed with the addition of the Renewal Eligibility Standings.	Staff provided additional information for Ivy Prep and SGSC renewals, which were for shorter terms.	N/A	Y
Recommendations include a detailed, objective and evidence-based explanation for the decision.	<b>Met</b> . Examples of 2020 recommendations found <a href="here">here</a> and 2022 recommendations in the <a href="zip file here">zip file here</a> .	Met.	Respondents agreed.	Y
The authorizer uses policy or procedure to ensure individuals involved in the renewal decision are free from conflicts of interest.	SCSC has a policy to address conflicts of interest.	Met. Only SCSC staff and commissioners serve on the renewal panel. This is intentional so that those making the decisions know the history and track record of each school.	Respondents agreed.	Y
	Needs Improvement	Adequate	Exemplary	Rating
Number of Criteria Met:	0-1	2-3	4	EX

• One recent renewal demonstrated SCSC's ability to be flexible and creative. The school had a terrible facility deal. The school struggled to meet financial standards due to the facility deal in place. But the school has strong academic performance. So, when a shortened renewal was proposed, SCSC and the school worked diligently to prepare a longer-term renewal with conditions to satisfy the Commission and the lender.

Advanced Criteria	Strengths	Areas of Growth
Expansion and Replication  The authorizer evaluates the prior performance of existing schools and the organization's capacity to grow in making expansion or replication decisions.	The recommendations include details of academic, financial, and operational performance and compliance over multiple years. See, e.g., <u>Liberty Tech Rec 2021</u> .	

Standard 15. Closure. In the event of school closure, either at the conclusion of the charter term or during the charter term, the authorizer oversees and ensures the school governing board and leadershipcarry out a detailed closure protocol that includes the provisions outlined in the charter contract, such as ensuring timely notification to parents; orderly transition of students and student records to new schools; and disposition of school funds, property, and assets in accordance with law, rule and contract terms.

Evaluation Criteria	Documentation Review	Authorizer Debrief	School Survey	Met Criteria? (Y/N)
The authorizer has a written policy for termination procedures that ensures timely notification to parents, orderly transition of students and student records to new schools, disposition of school funds, property, and assets in accordance with law and effectively implements policy in the event of a school closure.	A detailed <u>Suspension and Closure guide</u> is available.		N/A	Y
	Needs Improvement	Adequate	Exemplary	Rating
Number of Criteria Met:	0	0	1	EX

Advanced Criteria	Strengths	Areas of Growth
The authorizer has a plan that establishes clear roles and responsibilities with required steps for the orderly closure of a school. The authorizer provides support for transition of students to other schools.	School Suspension Closure Guide is organized and color coded in a way that provides clarity around the who, what, and when of closure. Sample language is provided in the guide that supports schools, students, and families in this transition.	Points of contact could be listed on the Closure Guide.