



SCSC Accountability: State Charter School Performance Reviews

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Introduction: SCSC Accountability

The mission of the SCSC is to improve public education throughout the state by approving high quality charter schools that provide students with better educational opportunities than they would otherwise be afforded in traditional schools. Thus, all state charter schools are expected to outperform the district(s) they serve, and the SCSC's accountability structure includes evaluations of both short-term and long-term performance. Specifically, each state charter school receives 1) annual performance evaluations to establish a school's progress toward renewal and 2) Five-Year Comprehensive Performance Reviews to establish whether a school's performance over time warrants a renewal recommendation. A state charter school that does not outperform the district or districts it serves will not be recommended for renewal.

Performance Review Structure

The State Charter Schools Commission of Georgia (SCSC) is required by law to monitor and review all state charter schools and hold them accountable for their performance. The SCSC holds schools accountable through both short-term and long-term evaluations. Specifically, SCSC accountability consists of:

1. Annual Performance Reviews;
 - On-site monitoring,
 - Assessment and publication of each school's academic, financial, and operational performance as measured by the SCSC Comprehensive Performance Framework, and
 - Performance Reviews and Presentations; and
2. Five-Year Comprehensive Performance Reviews.
 - Holistic review of each state charter school's long-term performance track record including, but not limited to, performance trends in the areas of academics, finances, and operations;
 - Interview between SCSC staff, SCSC commissioners, and state charter school representatives to discuss school performance and governance capacity; and
 - Consideration of charter renewal or the imposition of meaningful consequences such as nonrenewal or charter termination.

Annual Performance Reviews

Onsite Monitoring

Purpose. On-site monitoring is one of many tools that the SCSC uses to hold state charter schools accountable for acting in a manner that promotes the health, safety and education of all children. The SCSC is required to annually monitor and review state charter schools and hold them accountable for their performance. O.C.G.A. § 20-2-2083(b)(4) and SCSC Rule 691-2-.03 *State Charter School Monitoring*. Additionally, SCSC monitoring helps to ensure accountability for the proper use of taxpayer funding by state charter schools. Finally, SCSC monitoring helps promote high-quality charter schools by identifying concerns and incentivizing schools to correct noncompliance in a timely manner.

Monitoring focus. SCSC annual on-site monitoring is a focused effort to target identified areas of difficulty for state charter schools and test general compliance across a broad spectrum of applicable law. Because the SCSC cannot review every aspect of a school's operation for compliance on each applicable law, the SCSC selects specific areas to focus its monitoring activities. The SCSC selects where to focus its monitoring activities based on state charter school performance, previous issues, and concerns raised by stakeholders. While there may be some overlap across multiple years on key areas of concern, the SCSC generally concentrates monitoring activities on different areas of applicable law each year. The variation of attention of SCSC monitoring to different areas assists the SCSC and state charter schools in both remedying matters of concern and promoting generally compliant practices.

Monitoring preparation. Because SCSC on-site monitoring varies each year, SCSC staff will hold an information session and release the SCSC Monitoring Handbook prior to the start of the annual monitoring cycle to allow schools to prepare for on-site monitoring. Prior to conducting an on-site visit, SCSC staff requests specific information, policies, procedures, and forms from the school. In an effort to avoid placing undue administrative burdens on schools when conducting monitoring, the SCSC will collect and utilize documents from previous monitoring cycles as well as documents available on the school's website to evaluate a school's operational compliance in a variety of areas. The SCSC will utilize a documentation chart to indicate which documents were obtained from previous monitoring cycles, which documents were obtained from a school's website, and which documents the school will need to provide to staff for further review. The documentation chart will be shared with the school prior to onsite monitoring and will include instructions and a deadline for submission of additional materials. . SCSC staff will review all the information the school provides prior to the on-site monitoring visit to enable efficient and knowledgeable discussion during the monitoring visit.

Monitoring timeline. The SCSC prioritizes the order in which schools are monitored. Schools that are in their first year of operation and schools that have a history of noncompliance are monitored earlier in the monitoring cycle to allow for more timely identification of potential noncompliance and provide opportunities for additional on-site visits later in the year if necessary. Conversely, schools that have an established record of compliance are monitored later in the monitoring cycle and often experience a more efficient on-site visit.

Monitoring visit. SCSC staff will conduct an unannounced site visit shortly after reviewing the documents submitted by the school. During this visit, SCSC staff will be onsite for 2-4 hours and will need to speak to individuals knowledgeable about the school's operations and finances, which may include the School Leader or his/her designee. Overall, the site visit is largely an opportunity for SCSC staff to observe practices and discuss procedures to ensure they align with applicable law and school policies. SCSC staff will also observe classes and review financial records, such as purchase orders, cancelled checks, and budget reports. At the conclusion of the visit SCSC staff will summarize the visit, discuss any identified concerns, and detail any additional actions required to be completed by the school.

Post-monitoring actions. After SCSC staff reviews the documentation provided by the school and conducts the unannounced on-site visit, SCSC staff will provide the school a monitor letter that details noncompliance requiring remediation. A school's monitoring letter may include two

classifications of identified items – 1) “findings” detail instances in which the school’s actions or policies violate applicable law requiring immediate corrective action, and 2) “suggestions” detail the school’s actions or policies that do not violate applicable law though the school may wish to reexamine or improve its operations to mitigate risk or prevent future noncompliance. If the Monitoring Letter includes findings, the school must provide a Corrective Action Plan which consists of a written response outlining the anticipated remedy for each instance of noncompliance as well as milestones for completing the required action. The SCSC may conduct additional site visits to verify that findings are corrected, and the SCSC will specifically monitor any findings the following year.

Results of annual on-site monitoring will be reflected in the on the operational portion of the school’s annual Comprehensive Performance Framework* (CPF) report. If a state charter school receives a monitoring finding, the SCSC will deduct points from the correlating measure of operational compliance on the CPF. Additionally, Annual On-Site Monitoring results may be discussed in the school’s Annual Performance Review and Presentation. If the SCSC identifies that a school is in a material breach of its charter contract through on-site monitoring activities, or if a school fails to adequately remedy noncompliance through its Corrective Action Plan, the SCSC may initiate charter termination proceedings.

**The Comprehensive Performance Framework (CPF) establishes accountability expectations, guides practice, assesses progress, and informs decision making over the course of the charter term and at renewal or revocation.*

Assessment On the Comprehensive Performance Framework

Overview. As provided in in SCSC rule and in each state charter school contract, the SCSC utilizes a Comprehensive Performance Framework (CPF) to assess each state charter school in the areas of academic achievement, financial viability, and operational compliance. The CPF and its indicators and measures are incorporated into all charter contract as the accountability tool by which school performance is assessed. Thus, a school must meet expectations on the CPF to meet the academic, financial, and operational goals of its charter contract.

CPF standings are calculated and published on an annual basis to track each school’s progress toward renewal. A school’s collective CPF performance track record is used to inform decision making over the course of the charter term and at the time of the Five-Year Comprehensive Performance Review. A school’s CPF standing is a reflection of whether the school has met the requirements and goals set forth in its charter contract, applicable law, and SCSC rule and policies

The three areas of performance covered by the CPF—academic achievement, financial management, and organizational compliance— correspond directly with the three components of a high-quality charter school application as well as the three areas on which a charter school’s performance should be evaluated. In each of the three areas, the framework asks a fundamental question:

1. Academic Performance: Is the educational program offering students a better educational opportunity than they would otherwise receive at a traditional public school?
2. Financial Performance: Is the school financially viable?
3. Organizational Performance: Is the organization effective, compliant, and well-run?

Academic assessment under the CPF. To meet SCSC expectations, a state charter school must demonstrate that it provides a better educational opportunity than the district or districts it serves. A state charter school may satisfy this expectation by outperforming the district(s) it serves in terms of overall achievement, student growth, and/or value-added impact on student performance. **Financial assessment under the CPF.** State charter schools are required by law to obtain an independent financial audit every fiscal year. The results of that independent audit, including the school's financial statements, serve as the basis of the SCSC's annual assessment of school financial performance. The purpose of the SCSC's annual review of a school's financial performance is to determine if the school is fiscally responsible and financially viable on both near-term and sustainability measures.

Operational assessment under the CPF. Every year the SCSC will utilize a variety of methods to assess a school's operational performance and to determine if the organization is effective, compliant, and well-run. The operational section of the CPF includes broad categories containing specific measures and indicators aimed at ensuring the school's compliance with applicable laws, rules, and contractual provisions. Additionally, the operational section of the CPF holds schools accountable for maintaining a commitment to the essential and innovative features set forth within their charter contracts by tracking each school's ability to meet its established mission-specific goals.

CPF results. The results of a state charter school's annual academic, financial, and operational assessment under the CPF are provided to the school and will determine the school's participation in Annual School Performance Review Presentations. Poor performance in any category may also result in the SCSC's restriction of available grant funding as well as additional supports and interventions. If a school's annual assessment under the CPF reveals that the school is willfully noncompliant with material terms of its charter contract, the SCSC may initiate termination proceedings. Additionally, the SCSC compiles the annual operational analyses under the CPF through the 5-Year Comprehensive Performance Review that will determine whether the charter school is renewed or otherwise subject to meaningful consequences.

School Performance Reviews

Overview. The SCSC utilizes Annual Performance Reviews and Presentations to notify and engage schools and stakeholders on the topic of annual accountability standings and school progress towards charter renewal. SCSC Annual Performance Reviews and Presentations consist of two components: 1) the annual publication of school performance as measured by the CPF and 2) school-level performance presentations to SCSC commissioners and staff.

Publication of CPF reports. The SCSC annually assesses, compiles, and publishes academic, financial, and operational data relative to each school's performance on CPF measures. If a school does not earn all applicable points on a given measure, a detailed explanation is provided. The annual publication of CPF results outlines a school's current standing as well as its prospects for charter renewal and/or the imposition of consequences under the school's current contract.

School presentations. All state charter schools not meeting standards in all three areas (academics, finances, and operations) are required to deliver annual presentations to commissioners and staff at a public meeting. Annual presentations provide an opportunity for

schools to outline plans to improve performance in all areas of deficiency and respond to questions related to governance and practice. The SCSC does not infringe upon the autonomy of state charter schools to identify specific remediation efforts; however, the SCSC expects state charter schools to acknowledge and promptly address issues of noncompliance and nonperformance. School presentations are comprised of two primary components:

1. **Written Response** – The annual performance review begins with the school’s response to a written survey that prompts the school to describe actions the governing board completed to address performance. The survey aims to identify whether the school is reviewing its performance, adapting its practices, and holding appropriate individuals and entities accountable. The school must respond with identifiable actions and provide evidentiary support to substantiate the implementation of its reforms.
2. **Public Presentation** – Following the submission and evaluation of a school’s written response, the school presents to commissioners at an SCSC meeting. The presentation allows the school to summarize its plan for improvement and present data to illustrate the school’s progress. More importantly, the public presentation provides time and the opportunity for SCSC commissioners to discuss specific areas of concern with the school. While listening to a school’s plan of action, SCSC commissioners highlight their expectations of strong academic, financial, and operational performance and note that the school must improve to meet SCSC standards to be eligible for a renewed charter term.

SCSC annual performance review presentations are designed to extrapolate meaningful information regarding school performance rather than excuses for performance and anecdotal reports of success. Additionally, a school participating in the annual performance review presentations develops an actionable plan to remediate nonperformance through its involvement in the process. Moreover, the annual performance review presentation, combined with the annual publication of school performance under the CPF creates a demonstrable record of school performance, efforts to remediate nonperformance, and the ultimate record and results of performance and remediation efforts to guide the SCSC in imposing meaningful consequences under the charter contract, including charter termination or nonrenewal.

Five-Year Comprehensive Performance Reviews

Overview. In the fifth year of a school’s charter term, the SCSC will conduct a Five-Year Performance Review of the school’s academic, financial, and operational performance over the preceding four years. Every state charter school receives a Five-Year Performance Review regardless of the term of the school’s charter contract. For a school with a five-year charter contract, the Five-Year Performance Review determines whether the SCSC will renew the school’s charter contract. For a school that has a charter contract term longer than five years, the Five-Year Performance Review allows the SCSC to conduct an in-depth, high-stakes review of school performance and impose meaningful consequences as necessary, up to and including charter termination.

Purpose. The purpose of the Five-Year Performance Review is to examine the charter school's holistic performance over time. The SCSC utilizes the Five-Year Performance Review to A) evaluate a school's overall ability to meet the goals of the charter contract and B) identify performance trends in the areas of academic achievement, financial viability, and operational compliance as measured through the CPF. In contrast with SCSC Annual Performance Reviews, the Five-Year Performance review assesses a complete and comprehensive track record of performance so as to determine whether a charter school merits contract renewal, nonrenewal, or other meaningful consequences.

Process. The Five-Year Performance Review requires schools to complete a short narrative that outlines the cumulative history of the school's academic, financial, and operational performance under its charter contract. The narrative provides the school the opportunity to contextualize its performance and discuss its efforts to remediate its operations if the school did not meet academic, financial, or operational performance at any point during its charter contract. The narrative should not be utilized to defend nonperformance or reiterate actions discussed during preceding annual performance reviews.

The Five-year Performance Review also requires the school's governing board and administrators to meet with SCSC staff and commissioners to discuss the school's performance. During the meeting, the school and the SCSC discuss the school's history of academic, financial, and operational results combined with the school's efforts as demonstrated in its annual performance reviews. The SCSC highlights its expectation that the school must outperform the district or districts it serves and the school demonstrates how it met that standard. If the school did not meet SCSC expectations to outperform its comparison district, the SCSC will prepare the school for nonrenewal of its charter contract or the initiation of charter termination proceedings.

SCSC actions and school consequences. The SCSC takes appropriate action and imposes meaningful consequences on schools not meeting standards as determined by the SCSC. The SCSC will impose consequences, including charter termination, in any year of the charter contract in which they are merited regardless of the term of the charter contract. Specific actions that the SCSC may take and school consequences that may be imposed include, but are not limited to:

1. **Corrective Action Plans:** If the SCSC identifies that a state charter school is not in compliance with applicable law, rule, or regulation, the state charter school will be required to produce a written corrective action plan that is sufficiently detailed to allow the SCSC staff to determine how the school will remediate the issue and when the school will be in full compliance with applicable law. The SCSC will conduct additional monitoring of the school to determine if the corrective action has been completed and whether the school remediated its noncompliance. Any failure by the school to fulfill its corrective action will result in additional consequences, including charter termination.
2. **Required Training:** If the SCSC identifies systemic failures that can be improved or eliminated through subject-specific training, the SCSC may require state charter school governing board members or staff to attend specified trainings and display improved practices as measured by increased performance.

3. **Restriction on Expansion:** State charter schools that are not able to demonstrate academic, financial, and operational effectiveness through SCSC periodic reviews will not be permitted to expand operations. The SCSC will not approve expansion of grade levels, an increase in student population, or additional school sites or locations if the school does not meet performance measures in the outlined in the CPF and confirmed through SCSC annual review.
4. **Restriction of Grant Funding:** The SCSC provides grants to schools for both specific and general purposes; however, if the SCSC identifies areas of noncompliance or issues of concern as part of its comprehensive review, the SCSC will reduce, restrict, or eliminate a school's access to SCSC grant funding. For example, if the SCSC identifies possible financial mismanagement as part of its review, the SCSC may require the school to utilize a portion of the SCSC Administration Refund Grant to hire an independent forensic auditor.
5. **Reduction of State or Federal Funding:** If the SCSC, or another state or federal agency, identifies noncompliance with rule or law that requires the return or withholding of state or federal funding, the SCSC will cooperate with all appropriate parties and implement its contractual authorities to ensure the proper use of public funding.
6. **Charter Termination:** If the SCSC's annual or 5-year Performance reviews indicate that a state charter school is in material breach of its charter contract, including failing to consistently meet academic, financial, and operational performance expectations, the SCSC will initiate charter termination proceedings. The SCSC will also initiate charter termination proceedings if the SCSC review reveals grounds for termination outlined in Georgia law or the school's charter contract, including, but not limited to, the school's failure to adhere to generally accepted fiscal management or if the continued existence of the school is contrary to the best interest of its students or community.

The SCSC will identify and implement consequences as outlined in the charter contract and in proportion to a school's noncompliance. A state charter school that demonstrates the ability to remedy noncompliance within its autonomy will remain in good standing and be eligible for charter contract renewal provided the school meets SCSC academic, financial, and operational expectations. A state charter school that is not able to improve noncompliance will receive additional and more severe consequences imposed by the SCSC. If necessary, the SCSC will initiate charter termination proceedings without regard to the term of the school's charter contract. A state charter school that is not meeting SCSC academic, financial, and operational standards as evidenced through its Five-Year Performance Review will not receive a renewed charter contract.

Conclusion

The SCSC is committed to ensuring state charter schools meet academic, financial, and operational standards that promote high-quality charter schools that will provide better educational outcomes for their students. In so doing, the SCSC Comprehensive Performance

Review of state charter schools is designed to gather continual data regarding school operations through a thorough system of annual on-site monitoring and analysis of data under the SCSC Comprehensive Performance Framework. Further, the annual publication of school performance combined Annual Performance Reviews and School Presentations provides a clear understanding of the school's outcomes in comparison with SCSC expectations to deliver the school and stakeholders an explicit outlook towards charter renewal. The SCSC upholds its commitment and statutory charge to support high-quality charter schools through its Five-Year Performance Review that thoroughly examines a school's track record of performance under its charter contract to guide the SCSC in determining whether to renew the charter contract or impose other meaningful consequences under the contract.