



## Application to Authorize Charter Schools – Review Rubric

Applicant Name	Winona Area Public Schools (WAPS)
Date Application Submitted	02/28/2020; 06/01/2020 (revised)
Date of Capacity Interview	04/15/2020
Date Review Completed	05/01/2020; 06/22/2020 (revised)
Organization Type	Independent school district

### Overview and Rating Criteria

The authorizer approval process is designed to assess how well an applicant proposes to fulfill the role of a charter school authorizer, based on the requirements set out in Minnesota Statutes, Chapter 124E. Each element of the authorizer application directly aligns with the performance measures of the Minnesota Authorizer Performance Evaluation System (MAPES).

Reviewers apply the following definitions to the review of performance measures.

- **Satisfactory:** The documentation evidences compliance with state law and fulfillment of Minnesota’s standards for authorizing.
- **Clarification and Action:** The documentation evidences compliance with state law and/or fulfillment of Minnesota’s standards for authorizing; however, it is unclear and warrants further clarification in the revised application. Specific requests for clarification will be provided.
- **Deficiency and Action:** The documentation does not evidence compliance with state law and/or fulfillment of Minnesota’s standards for authorizing. Specific deficiencies will be identified.
- **Continuous Improvement Note(s):** While the required element is compliant, MDE’s feedback is provided in alignment with the state’s authorizer performance standards and other guidance. Revisions based on continuous improvement notes are recommended but not required.

*In order to be approved as an authorizer, an applicant must receive a satisfactory rating on all rubric items.*

### General Review Comments

In the Part A and Part B narratives, various measures include a table that lists data sources, folder names and page numbers. The table also provides a column for “Item Number,” and then provides a range of numbers. For example, in measure A.3, the column header reads: “Item Number (1, 2, 3 and/or 4 from list above)” (p. 7). In each case, it is unclear as to what the “list above” is referencing.

The Part B narrative submission is a draft version with mark-up visible (e.g., “placeholder” highlights) and WAPS staff comments in the margin. MDE requested a “complete, final and comprehensive application” be submitted for review in its letter dated 05/01/2020.

Lastly, it is not necessary to include copies of statutory language as part of an authorizing plan submission, as mentioned in the initial review, because this information can change annually. Hyperlinks to the current [Revisor of Statutes](#) would be the best way to ensure the current version of statute is referenced.

## Part A: Authorizer Capacity and Infrastructure

### Measure A.1 - Authorizer Mission

*The applicant has a clear and compelling mission for charter school authorizing.*

Essential Elements <i>(required to be addressed)</i>	Fully Addressed? (Yes/No)
Identify the applicant’s clear and compelling mission and indicate how it fully aligns with Minnesota Statutes, Chapter 124E.	No
Describe how authorizing charter schools realizes the applicant’s mission.	No
Review Comments	Rating
<p>The measure is discussed in the revised Part A narrative (pp. 1-3), revised WAPS Charter School Manual (p. 5), WAPS Strategic Plan, and Board Policy 104.</p> <p><b>Clarification and Action:</b></p> <p>The authorizer mission provided in the Part A narrative (p. 1) and Charter School Manual (p. 5) differs from what is provided on the <a href="#">WAPS Charter School Authorization webpage</a>. It remains unclear how authorizing charter schools realizes the WAPS mission.</p> <p>The Part A narrative states “As part of the authorizer process, and codified in the charter school contract, charter schools are required to engage in a school improvement planning process (with measurable goals) on an annual basis” (p. 2). However, this requirement does not appear in the charter contract. This remains unclear.</p>	<b>Clarification and Action</b>

## Measure A.2 - Authorizer Vision and Organizational Goals

*The applicant has a comprehensive vision for charter school authorizing with clear organizational goals and time frames for achievement that are aligned with the purposes of Minnesota law.*

Essential Elements <i>(required to be addressed)</i>	Fully Addressed? (Yes/No)
Identify the applicant's comprehensive vision for charter school authorizing and indicate how it fully aligns with Minnesota Statutes, Chapter 124E.	No
Identify the applicant's measurable organizational goals that align with the applicant's chartering vision including the criteria and timeframe for achievement.	No
Advanced Elements <i>(not required to be addressed)</i>	Fully Addressed? (Yes/No)
Explain how the applicant will regularly evaluate its work against its chartering vision and organizational goals.	No
Explain how the applicant will implement improvement plans if falling short of its vision and organization goals.	No
Review Comments	Rating
<p>The measure is discussed in the revised Part A narrative (pp. 4-5), revised WAPS Charter School Manual (pp. 6-7), and Board Policy 104.</p> <p><b>Clarification and Action:</b></p> <p>The authorizer vision provided in the Part A narrative (p. 3) and Charter School Manual (p. 6) differs from what is provided on the <a href="#">WAPS Charter School Authorization webpage</a>. The authorizer vision remains unclear.</p> <p>The revised submission includes two different sets of goals, one in the Part A narrative (p. 4) and one in the Charter School Manual (p.7). The criteria and timelines for achievement of these goals are unclear. For example, in the Part A narrative, it is unclear how the performance data will be aggregated or compiled between the two currently authorized schools to evaluate WAPS as an organization.</p>	Clarification and Action

<p>The application indicates WAPS will “Be open to charter school development to satisfy unmet educational needs” (WAPS Charter School Manual, p. 6) but the authorizing goals do not indicate WAPS plans to assess unmet needs, and the WAPS narrative does not address planned expansion of the WAPS portfolio. This remains unclear.</p> <p><b>Continuous Improvement Note:</b></p> <p>The primary purpose of charter schools is misstated in the Part A narrative (p. 4).</p>	
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## Measures A.3 & A.4 - Authorizer Structure of Operations & Authorizer Staff Expertise

*The applicant has a clear structure of duties and responsibilities and sufficient resources to effectively oversee its portfolio of charter schools. The applicant has appropriate experience, expertise and skills to sufficiently oversee the portfolio of charter schools.*

### Definitions:

- “Expertise” is defined as having knowledge, education, training, etc. in the areas of charter schools, curriculum, instruction, management, facilities, finance and law.
- “Experience” is defined as length of time working in the areas of charter schools, curriculum, instruction, management, facilities, finance and law.
- “Skills” is defined as effective application of experience and expertise in the areas of charter schools, curriculum, instruction, management, facilities, finance and law.

Essential Elements <i>(required to be addressed)</i>	Fully Addressed? (Yes/No)
Describe the capacity of the applicant to serve as an authorizer, including the positions (e.g. employees, contractors, volunteers; both paid and unpaid positions) allocated to authorizing duties, the qualifications for those positions (expertise, experience and skills), the full-time equivalencies of those positions and the financial resources available to fund the positions.	No
Describe how the applicant will manage and safeguard information, data and records related to authorizing.	No
Provide an organizational chart that shows clear lines of reporting and authority/decision-making and, if applicable, showing projected organizational changes due to proposed expansion over the five-year term.	No

Review Comments	Rating
<p>The measure is discussed in the revised Part A narrative (pp. 6-7); WAPS Charter School Manual (pp. 8-9); job descriptions for the Director of Finance, Director of Human Resources, Director of Learning and Teaching, Director of Special Education, and Superintendent; responsibilities for the school board member; resumes for those six individuals; WAPS District organizational chart; and board policies 406 and 515. The application does not indicate any proposed expansion over the next five years.</p> <p>A separate, draft version of the A.3/A.4 narrative was also submitted.</p> <p><b>Deficiency and Action:</b></p> <p>The revised application indicates Google Drive is used for managing and safeguarding information and data; however, using Google Drive does not mean information, data and records are safeguarded as required by Minnesota Statutes, Chapter 13 (the Minnesota Government Data Practices Act). For example, the link to the Complaint Form in the B.6 narrative (pp. 16-17) and Charter School Manual (p. 18) allows anyone to freely edit the form and read responses/complaints submitted, potentially revealing private, nonpublic or otherwise sensitive information.</p> <p>The narrative indicates WAPS has one “Charter School Authorizer Team Coordinator (Liaison) at approximately .2 FTE” (p. 5). In the organizational chart this staff member is indicated as Dr. Maurella Cunningham, the Director of Learning and Teaching, who has 13 areas which report to her, involving an unspecified number of staff and programs. During the capacity interview, WAPS indicated the organizational chart has been revised to allow the Director of Learning and Teaching to dedicate one day a week to charter school authorizing. A revised organizational chart was not provided in the final submission. Therefore, WAPS structure, which would demonstrate adequate resources and commitment to authorizing, remains unclear.</p>	<p><b>Deficiency and Action</b></p>

## Measure A.5 - Authorizer Capacity and Skill Development of Leadership and Staff

*The applicant has a plan to build the knowledge and skill base of its authorizing leadership and staff through professional development. The applicant has a plan to provide professional development aligned with its operations, vision and goals for overseeing its portfolio of charter schools.*

Essential Elements (required to be addressed)	Fully Addressed? (Yes/No)
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Describe the applicant's plan to offer professional development to authorizing leadership and staff.	Yes
Describe the frequency and nature of potential professional development as well as personnel expected to attend.	Yes
Describe how professional development will align with the applicant's operations, vision and goals for its portfolio of charter schools.	Yes
<b>Advanced Element</b> <i>(not required to be addressed)</i>	<b>Fully Addressed?</b> <b>(Yes/No)</b>
Describe how professional development will be measured, evaluated and customized to meet the needs of the authorizing leadership and staff.	No
<b>Review Comments</b>	<b>Rating</b>
<p>The measure is discussed in the revised Part A narrative (pp. 8-10), revised WAPS Charter School Manual (pp. 11-12), Authorizer Needs Assessment, and PD Listing.</p> <p><b>Continuous Improvement Notes:</b></p> <p>WAPS Authorizer Needs Assessment for MAPES B.3 indicates the authorizing staff have a clear understanding of the process of WAPS renewal contract template. Please consider adding to include a clear understanding of the executed charter contracts for schools within the WAPS portfolio. Please also consider adding a clear understanding of Minnesota Statutes, Chapter 124E to the WAPS self-evaluation.</p>	<b>Satisfactory</b>

## Measure A.6 - Operational Budget for Authorizing the Portfolio of Charter Schools

*The applicant has a plan to allocate resources commensurate with its stated budget, needs and responsibilities of authorizing the portfolio of charter schools.*

<b>Essential Elements</b> <i>(required to be addressed)</i>	<b>Fully Addressed?</b> <b>(Yes/No)</b>
Include the applicant's anticipated five-year budget (for example, FY 2020-FY 2024) outlining the following:	No

<input type="checkbox"/> Anticipated revenue sources such as fees collected annually from schools and additional funds from outside sources. <input type="checkbox"/> Anticipated expenditures such as staff, travel, consultants, office costs (e.g. equipment, supplies), etc. <input type="checkbox"/> Anticipated staff expenditures and personnel budget increases in relation to portfolio growth.	
Provide the target number and size of schools for the portfolio of charter schools for a five-year period.	Yes
<b>Advanced Element</b> <i>(not required to be addressed)</i>	<b>Fully Addressed?</b> <b>(Yes/No)</b>
Describe how the applicant's budget shows resource allocations dedicated to achieving nationally recognized quality authorizing standards.	No
<b>Review Comments</b>	<b>Rating</b>
<p>The measure is discussed in the revised Part A narrative (pp. 11-13) and 5-year budget.</p> <p><b>Clarification and Action:</b></p> <p>The Part A narrative states, "Participation in the NACSA and MACSA training sessions will be a way in which the Authorizer is demonstrating a connection and commitment to nationally recognized best practices for charter authorizing" (p. 11). However, only \$250 are allocated to professional development each year. Last year, for example, rates for the full NACSA Leadership Conference ranged from \$500 to \$700, not including travel expenses. The narrative later states, "the Authorizer will use funds allocated in the Federal Charter Schools Program (CSP) Grant, as described in the State of Minnesota Contract, to support participation in professional development for Charter School Authorizer Team members. The funds, \$12,500.00, to be used by September 30, 2022, will contribute to the Authorizer's knowledge of and skills needed to serve the charter schools in its portfolio" (p. 13). However, these funds are not included in the budget.</p> <p>The budget provides a line item for "Authorizing Staff (e.g. Superintendent, Directors)." The budget does not provide the FTE breakdown of superintendent and directors time allocation in the authorizing budget. In addition, it is unclear how the remaining four members of WAPS Charter School Authorizer Team are compensated.</p> <p><b>Continuous Improvement Note:</b></p>	<b>Clarification and Action</b>

The Part A narrative states “provisions for portfolio growth is documented in the Winona Area Public Schools Authorizer Operational Budget” but projections for portfolio growth do not appear in the budget and are also not discussed in A.3 & A.4. Portfolio expansion is possible according to B.1 and revenue expansion may occur in relation to B.2, but these contingencies are not addressed in the budget.	
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## Measure A.7 - Authorizer Operational Conflicts of Interest

*The applicant implements a clear policy to address conflicts of interest in all decision-making processes concerning the portfolio of charter schools.*

Essential Elements <i>(required to be addressed)</i>	Fully Addressed? (Yes/No)
Include the applicant’s policy to address conflicts of interest in all decision-making processes concerning the portfolio of charter schools.	No
Describe the process and procedures for implementing and executing the applicant’s conflict of interest policy to avoid conflicts of interest that might affect the applicant’s capacity to make objective, merit-based application and renewal decisions and avoid decisions and interventions that hold the charter school accountable for its performance.	No
Review Comments	Rating
<p>The measure is discussed in the revised Part A narrative (pp. 14-15), revised WAPS Charter School Manual (pp. 10-11), and Charter School Authorization Conflict of Interest Policy and Form.</p> <p><i>Please note: WAPS also included information about complaints in response to this measure; this information is evaluated in measure B.6 below.</i></p> <p><b>Clarification and Action:</b></p> <p>The Part A narrative and supporting documentation did not address whether the WAPS Charter School Authorization Conflict of Interest Policy has been approved by the WAPS board. Please ensure submitted policies are board-approved.</p> <p>In addition, the WAPS Conflict of Interest Policy only addresses WAPS staff that are part of WAPS’ Charter School Authorization Team and not WAPS staff as a whole or the school board as the decision-making authority.</p>	<p><b>Clarification and Action</b></p>

## Measure A.8 - Ensuring Autonomy of the Schools in the Portfolio

The applicant implements a policy to preserve and support the essential autonomies of the portfolio of charter schools.

Essential Elements <i>(required to be addressed)</i>	Fully Addressed? (Yes/No)
Include the applicant's policy to ensure school autonomy and indicate how it fully aligns with Minnesota Statutes, Chapter 124E.	No
Describe how the applicant's policy on school autonomy establishes and recognizes the school's authority over academic, operational and financial needs and respects the school's authority over the schools' day-to-day operations.	Yes
Describe the process and procedures for implementing and executing the applicant's policy to ensure school autonomy.	No
Describe how the applicant will hold schools accountable for outcomes rather than processes and operations.	No
Advanced Element <i>(not required to be addressed)</i>	Fully Addressed? (Yes/No)
The applicant describes how its policy to ensure school autonomy aligns with nationally recognized quality authorizing principles and standards.	Yes
Review Comments	Rating
<p>The measure is discussed in the revised Part A narrative (pp. 16-17), revised WAPS Charter School Manual (pp. 9-10), Charter School Autonomy Policy, and Charter School Contract Template (two different versions submitted).</p> <p>A copy of NACSA's Principles and Standards was also provided.</p> <p><b>Clarification and Action:</b></p> <p>A Charter School Autonomy Policy was submitted; however, it does not appear to be board approved. In the capacity interview, WAPS indicated the policy had not been approved by the board; it would first need to be sent from the Charter School Authorizer</p>	<b>Clarification and Action</b>

<p>Team to the board operations committee for review before being sent to the full board. The Part A narrative states, “The Board Operations Committee is reviewing a model policy related to Charter School Authorization Autonomy in the event that our Charter School Authorizer Application is approved. It is scheduled to be reviewed in the Summer” (p. 16). It is unclear if the policy submitted is that model policy. That said, a board-approved policy is still not in place.</p> <p>Because an official board-approved policy is not in place, the process and procedures for implementing and executing the applicant’s policy to ensure school autonomy is also not clear.</p> <p>It is unclear how the WAPS will hold schools accountable for outcomes rather than processes and operations. Please see the review of measures B.4 and B.9 below.</p> <p><b>Continuous Improvement Notes:</b></p> <p>The Part A narrative incorrectly references the primary purpose under the section titled “Holding Schools Accountable” (p. 16).</p> <p>The Part A narrative (p. 16) incorrectly references where the WAPS Charter School Manual and the Charter Contract Template contain sections on autonomy. The narrative references p. 8 of the Manual, but the section is on pp. 9-10. The narrative references p. 1 of the Contract Template, but sections 4.10 and 5.2 (p. 3) address autonomy in one contract template, and Articles II and IV (pp. 4-6) address autonomy in the other contract template. (See measure A.3 below for review of the two charter contract templates submitted.)</p>	
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## Measure A.9 - Authorizer Self-Evaluation of Capacity, Infrastructure and Practices

*The applicant plans to self-evaluate its internal ability (capacity, infrastructure and practices) to oversee the portfolio of charter schools.*

Essential Elements <i>(required to be addressed)</i>	Fully Addressed? (Yes/No)
Describe the applicant’s plan to regularly review its internal ability to oversee its portfolio of charter schools.	No
Describe the applicant’s process to implement continuous improvement plans which will result in more effective authorizing practices	No

<b>Advanced Elements</b> <i>(not required to be addressed)</i>	<b>Fully Addressed?</b> <b>(Yes/No)</b>
Describe the process the applicant will use to evaluate its internal ability (capacity, infrastructure and practices) regularly against its mission, vision and organizational goals.	No
Describe the applicant's framework(s) for addressing any needs for improvement if falling short of its mission, organizational goals or strategic plan.	No
<b>Review Comments</b>	<b>Rating</b>
<p>The measure is discussed in the revised Part A narrative (pp. 18-19), revised WAPS Charter School Manual (p. 12), Board Policy 304, Authorizer Self-Evaluation Tool, Director Evaluation Plan, draft Superintendent Performance Evaluation for SY 2019-2020, and Superintendent Performance Evaluation Rubric.</p> <p>A separate version of the A.9 narrative was also submitted.</p> <p><b>Clarification and Action:</b></p> <p>The tools provided indicate evaluations of the superintendent and directors; however, they do not discuss or mention charter school authorizing. How the evaluation process for all individuals who serve on the Charter School Authorizer Team addresses the roles, capacity, infrastructure and practices of authorizing remains unclear.</p> <p>The Part A.9 narrative and supporting documents do not serve to describe the applicant's process to implement continuous improvement plans which will result in more effective authorizing practices.</p> <p><b>Continuous Improvement Note:</b></p> <p>"Re-licensure information" is listed as a Data Source (p. 18), but was not submitted as an attachment.</p>	<b>Clarification and Action</b>

## **Measure A.10 - Authorizer High Quality Authorizing Dissemination**

*The applicant plans to disseminate best authorizing practices and/or assist other authorizers in high quality authorizing.*

<b>Essential Elements</b> <i>(required to be addressed)</i>	<b>Fully Addressed?</b> <b>(Yes/No)</b>
Describe the applicant's process to share best practices and/or provide assistance to other authorizers to promote high quality authorizing.	Yes
Describe the applicant's intent to engage with other professionals (such as state or national associations) in order to improve the authorizing community of practice in the state including sharing best practices and/or providing technical assistance to other authorizers.	Yes
<b>Review Comments</b>	<b>Rating</b>
<p>The measure is discussed in the revised Part A narrative (p. 19).</p> <p>A separate version of the A.10 narrative was also submitted.</p> <p><b>Continuous Improvement Note:</b></p> <p>"MACSA" is referenced as the Minnesota Association of Charter Schools instead of as the Minnesota Association of Charter School Authorizers in the Part A narrative (p. 19). This is corrected in the separate A.10 narrative document.</p>	<b>Satisfactory</b>

### **Measure A.11 - Authorizer Compliance to Responsibilities Stated in Statute**

*The applicant intends to comply with reporting, submissions and deadlines set forth in Minnesota Statute.*

<b>Essential Element</b> <i>(required to be addressed)</i>	<b>Fully Addressed?</b> <b>(Yes/No)</b>
Describe the applicant's internal process to ensure compliance with reporting, submissions and deadlines set forth in Minnesota Statutes.	No
<b>Review Comments</b>	<b>Rating</b>
<p>The measure is discussed in the revised Part A narrative (p. 20) and timeline of charter-related meetings and due dates.</p> <p><b>Deficiency and Action:</b></p>	<b>Deficiency and Action</b>

<p>The timeline submitted is missing the due date for authorizer income and expenditure reports under Minnesota Statutes, section 124E.05, subdivision 8. Additionally, the due date for FY2021 change in authorizer requests is incorrect.</p> <p><b>Continuous Improvement Note:</b></p> <p>The Part A narrative indicates the timeline will be updated “as needed to reflect changes to statute and MDE deadlines” (p. 20). The timeline provided only addresses some of the deadlines and expectations for the next year, through April 2021, but does not provide the process to ensure compliance with reporting, submissions and deadlines for the authorizing term. WAPS should consider updating the timeline at least annually.</p>	
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## Part B Measures: Authorizer Processes and Decision Making

### Measure B.1 - New Charter School Decisions

*The applicant has clear and comprehensive approval criteria and process standards to rigorously evaluate new charter school proposals. The applicant outlines new charter school decision-making processes that will promote the growth of high quality charter schools.*

Essential Elements <i>(required to be addressed)</i>	Fully Addressed? (Yes/No)
<p>Submit comprehensive new charter school application, instructions, evaluative criteria, procedures, timelines and review process that address the following elements:</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Mission/Vision</li> <li><input type="checkbox"/> Need/Demand</li> <li><input type="checkbox"/> Primary statutory purpose of improving all pupil learning and all student achievement (Minnesota Statutes, section 124E.01, Subdivision 1) and how the school will report the implementation of it to the applicant.</li> <li><input type="checkbox"/> Additional purpose(s) and how the school will report the implementation of said purpose(s) to the applicant.</li> <li><input type="checkbox"/> A charter school must design its programs to at least meet the outcomes adopted by the commissioner for public school students, including world's best workforce goals under section 120B.11, subdivision 1. In the absence of the commissioner's requirements governing state standards and benchmarks, the school must meet the outcomes contained in the contract with the authorizer. The achievement levels of the outcomes contained in the contract may exceed the achievement levels of any outcomes adopted by the commissioner for public school students. (Minnesota Statutes, section 124E.10, Subdivision 1(c))</li> </ul>	No

<input type="checkbox"/> Academic plan: description of the school program, specific academic and nonacademic outcomes that students must achieve, educational philosophy and approach, school culture, curriculum and instruction, assessment and services for special populations <input type="checkbox"/> Operational plan: governance and management structure, administration, human resource recruitment and development, student recruitment and enrollment, admission policy, school calendar, parent and community involvement, operational outcomes, compliance with applicable laws and regulations, facilities and location <input type="checkbox"/> Financial plan: short and long-term financial projections, budget(s), business management procedures, financial outcomes, facility planning <input type="checkbox"/> A “statement of assurances” of legal compliance prescribed by the commissioner <input type="checkbox"/> Any other information the authorizer requests	
Develop the applicant’s review process including clear and transparent procedures and rigorous criteria to evaluate new charter school applications.	No
Describe the new charter school application process timeline consistent with statutory deadlines per Minnesota Statutes, section 124E.06.	No
<b>Advanced Element</b> <i>(not required to be addressed)</i>	<b>Fully Addressed?</b> <b>(Yes/No)</b>
Identify how the applicant’s new charter school application process is designed to promote high quality charter schools and align with national quality authorizing principles and standards.	No
<b>Review Comments</b>	<b>Rating</b>
<p>The measure is discussed in the revised Part B narrative (pp. 2-4), revised WAPS Charter School Manual (pp. 19-23), revised New Charter School Application, and revised New Charter School Assessment Rubric.</p> <p>Two versions of the New Charter School Application were submitted. MDE reviewed the one named “REVISED_B1 New Charter School Application,” as this appeared to be the final version.</p> <p><b>Clarification and Action:</b></p>	<b>Clarification and Action</b>

The Charter School Manual indicates that the application process includes a letter of intent (p. 19); however, the letter of intent is not included consistently throughout the process outlined in the manual, nor is it included in the Timeline (pp. 20-22).

Additionally, the timeline indicates applications are due February 1 “of following year-Year 1),” with a final determination by “April 1 of following year-Year 2” (p. 22). Seventy-five days are provided for review and revisions (15 days + 30 days + 30 days). However, 75 days from February 1 would be April 16 or April 17, depending on the year. Based on the timeline presented, it’s also possible that the final decision will be made April 1 of the year following submission of the application, or over 420 days between application submission and final decision.

The threshold for recommendation of application approval is inconsistent and unclear in the submission. The Part B narrative states, “Successful applicants will receive ratings of ‘Meets Standards,’ or above, in the areas of Executive Summary, Academics and Educational Programming, Fiscal Management: Budget and Finance, Governance and Leadership, and Operations and Legal Compliance” (p. 3). However, the Charter School Manual states in one instance that “Successful applications must earn a ‘Meets Standards’ or higher rating on 90% of the rubric items” (p. 20) and in another instance “Successful applications will earn a ‘Meets Standards’ or better rating” (p. 21). Additionally, in the New Charter School Assessment Rubric, some metrics are missing ratings, and other metrics have double sets of ratings. The criteria for recommendation of approval remains unclear.

The Governance and Leadership rubric items (p. 5) do not fully align with the Governance and Leadership information in the application (p. 4).

**Continuous Improvement Notes:**

The Part B.1 narrative (p.2) refers to pages 13-17 of the WAPS Charter School Manual as pertinent to this measure; however, pages 19-23 of the Charter School Manual include the information for measure B.1.

The New School Application requests the proposed charter school to “Create a list for individuals who will be in an administrative role in the charter school” (p. 5). It is important to note the administrative staff are likely not hired at this point in the process as the proposed school has not been officially chartered and cannot contract for professional or other services. WAPS could request if any individual from the Charter School Leader Contact List (p. 4) intends to apply for a position at the school, and if so, which position(s). If not all administrative positions are covered, the application could request the school to provide the qualifications they will look for in the administrative team once approved as a charter school.

<p>In the New School Application, under Student Recruitment and Enrollment and Admission (p. 6), please consider including reference to Minnesota Statutes, section 124E.11 as proposed schools develop their processes. Additionally, under Legal Compliance, the application indicates, “Describe the plan to comply with applicable laws and regulations once charter school is operational” (p. 6). Please consider listing the applicable laws and regulations for which founders should be aware and would be evaluated.</p> <p>The WAPS application does not fully address the need and demand for the charter school. MDE provides the following definitions in its current new charter school affidavit instructions document:</p> <ul style="list-style-type: none"> <li>• Demonstration of need for the proposed school in the community to be served. “Need” means the reasons the proposed school is necessary in the community to be served. Need can be demonstrated by, for example, describing why existing school options in the community are insufficient or inadequate.</li> <li>• Evidence of demand for the proposed school in the community to be served. “Demand” means the desire of prospective families to enroll their children in the proposed school’s education program. Demand can be evidenced by, for example, feedback from listening sessions or survey results from prospective families.</li> </ul> <p>The New Charter School Application indicates a hyperlink to MDE’s FY2020 New Charter School Affidavit instructions (p. 1); however, the link is not functional/present.</p> <p>The advanced element does not identify how the applicant’s new charter school application process is designed to promote high quality charter schools and align with national quality authorizing principles.</p>	
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## Measure B.2 - Interim Accountability Decisions

*The applicant has clear and comprehensive approval criteria and process standards to rigorously evaluate school opening decisions as well as proposals of existing charter school expansion requests and interim changes. The applicant outlines interim accountability decision-making processes that will promote the growth of high quality charter schools.*

Essential Elements <i>(required to be addressed)</i>	Fully Addressed? (Yes/No)
Submit comprehensive application instructions, evaluative criteria, procedures, timelines and review processes that are aligned with statute and includes academic, operational and financial conditions upon which the applicant approves or denies <b>adding grades or sites per Minnesota Statutes, section 124E.06, subdivision 5.</b>	No

Submit comprehensive application instructions, evaluative criteria, procedures, timelines and review processes that are aligned with statute and includes academic, operational and financial conditions upon which the applicant approves or denies <b><i>official early learning program(s) recognition per Minnesota Statutes, section 124E.06, subdivision 3(b) and Minnesota Statutes, section 124E.03, subdivision 7(b).</i></b>	No
Submit comprehensive application instructions, evaluative criteria, procedures, timelines and review processes that are aligned with statute and includes academic, operational and financial conditions upon which the applicant approves or denies <b><i>change in authorizer requests per Minnesota Statutes, section 124E.10, subdivision 5.</i></b>	No
Submit comprehensive application instructions, evaluative criteria, procedures, timelines and review processes that are aligned with statute and includes academic, operational and financial conditions upon which the applicant approves or denies <b><i>ready to open per Minnesota Statutes, section 124E.06, subdivision 3(h).</i></b>	Yes
<b>Advanced Element</b> <i>(not required to be addressed)</i>	<b>Fully Addressed?</b> <b>(Yes/No)</b>
Identify how the interim accountability decision-making processes are designed to promote high quality charter schools and align with national quality authorizing principles and standards.	No
<b>Review Comments</b>	<b>Rating</b>
<p>The measure is discussed in the revised Part B narrative (pp. 5-7), revised WAPS Charter School Manual (pp. 14, 19-20, 23-25, 27-30), revised Expansion Application, revised Change in Authorizer Application, and the Ready to Open Site Visit (in the B.1 folder).</p> <p>Copies of MDE's FY2020 Supplemental Affidavit Instructions, MDE's FY2020 Change in Authorizer Request Instructions, and NACSA's Principles and Standards were also submitted.</p> <p>The Expansion Assessment Rubric and Ready to Open Task List from the previous submission were not resubmitted. A version of the Ready to Open Task List can be accessed from a link in the revised Charter School Manual (p. 23).</p> <p><b>Deficiency and Action:</b></p> <p><b><u>Supplemental Affidavits</u></b></p>	<b>Deficiency and Action</b>

Two versions of the Expansion Application were submitted. MDE reviewed the one named "Revised\_WAPS B2 Expansion Application," as this appeared to be the final version.

The Part B.2 narrative indicates, "The expansion application is due May 1 of the year prior to the planned expansion" (p. 5). However, the Expansion Application indicates, "Paper and digital copies may be submitted to Winona Area Public Schools at any time" (p. 1). Additionally, the Charter School Manual indicates the application is due October 1; however, this timeline includes elements from a version of the renewal process timeline, concluding with the submission of a supplemental affidavit (pp. 24-25). The application referenced in this timeline may be the renewal application, not the expansion application. The expansion timeline presented in the Charter School Manual is inconsistent with the expansion application review process described in the rest of the manual (pp. 19-20, 24). The expansion application submission deadline and review timeline are unclear.

In the WAPS Expansion Application, the Assessment Data section indicates "see note below" (p. 3); however, there is no note. This remains unclear.

The Expansion Application provides a link to a Conflict of Interest form (p. 2); however, the form is for the WAPS Charter Authorization Team and not applicants as indicated in the application instructions.

The Expansion Application provides a link to MDE's FY2020 New Charter School Affidavit instructions (p. 1); however, the application should link to MDE's Supplemental Affidavit instructions, as this is the statutory process for a charter school to expand to add grades or primary enrollment sites. The current version is updated for FY2020. Additionally, both the Charter Schools Manual and Application are inconsistent with the section requirements for a supplemental affidavit (Manual, p. 24; application, p. 1). In order to ensure the correct forms and requirements are referenced, please update the link to the current version of the [Authorizer Resources webpage](#) where updated versions will be posted over time. Please also ensure, if referencing parts of the supplemental affidavit, that such references are consistent with the current published version of MDE's Supplemental Affidavit instructions document.

The Expansion Assessment Rubric was not included in the resubmitted application. As such, the following concerns remain outstanding:

- The Expansion Assessment Rubric does not align to the Expansion Application. For example, the rubric contains sections on Early Learning, if applicable; however, the application provides no prompts about early learning. Please ensure the criteria in the rubric are aligned to the prompts in the application.
- Within the Expansion Assessment Rubric itself, it is unclear how reviewers will determine if measures have been met or not, as there is no criteria for making

that determination. It is unclear what is meant by “Goal not met,” “Goal met with comment,” and “Goal met.” Please clarify these ratings and how they will be assigned by reviewers to ensure inter-rater reliability.

- The Expansion Assessment Summary section of the review rubric allows for the approval of “Expansion,” “Mutual Non-renewal” or “Renewal” with the new contract term length provided. It’s unclear why “Mutual Non-renewal” and “Renewal” are included as options as this rubric is for grade/site expansions. In addition, the third paragraph (p. 1) of the rubric is language related to contract review, not expansion requests. Please clarify.

### **Early Learning Program Requests**

Two versions of the Early Learning Application were submitted. MDE reviewed the one named “Revised\_WAPS B2 Early Learning Application\_LAST,” as this appeared to be the final version.

The Early Learning Assessment Rubric is not aligned to the Early Learning Application. Specifically, the assessment rubric does not address “Parts B, E, F” from the application (pp. 5-7).

The Part B narrative indicates early learning “applications are due to Winona Area Public Schools no later than June the year prior to the proposed expansion” (p. 6). However, the application states applications are to be submitted by July 1 (p. 1).

### **Change in Authorizer Requests**

An Intent to Apply for Transfer of Authorization Form is referenced in the Part B narrative (p. 6). MDE requested a copy of this form but it was not provided in the resubmission.

A Change in Authorizer Assessment rubric is referenced in the Charter Schools Manual (p. 19). MDE requested a copy of this rubric but it was not provided in the resubmission. It is unclear how WAPS evaluates change in authorizer requests.

The Change in Authorizer Application states the due date for submission is September 1 (p. 1); however, the Charter School Manual states the application is “Due no later than July 1 the year prior to the end of the contract” (p. 29). The application deadline and review timeline remain unclear.

The Change in Authorizer Application, Assessment Data section indicates “see note below” (p. 3); however, there is no note. This remains unclear.

The Charter School Manual Change in Authorizer Setting 1 Process (when a WAPS-authorized school seeks to change to a new authorizer) does not address the process and statutory requirement of providing a letter to the commissioner to mutually not renew the contract. It is also unclear how a final determination is made, given that an

<p>application, revisions and recommendations are not included in the Setting 1 process (Charter School Manual, pp. 28-30). Please clarify how final determinations will be made to agree to mutual nonrenewal and to provide a letter to the commissioner indicating the two parties have mutually agreed to not renew the contract.</p> <p><b>Continuous Improvement Notes:</b></p> <p>Many page number references to the Charter School Manual are not included in this section of the Part B narrative; instead, the text "(pp. )" is highlighted, indicating placeholders for page numbers to be inserted.</p> <p>The Change in Authorizer Application also contains a link but it cannot be accessed due to permissions set-up (p. 1).</p> <p>The WAPS New Charter Ready to Open Task List was not resubmitted by WAPS; however, an online version is accessible through the revised Charter Schools Manual (p. 23). The WAPS New Charter Ready to Open Task List has a task on page 6 which states: "Set date, prior to opening, to participate in administrative review and goal setting exercise with CLSD." CLSD appears to be a typo referencing Chicago Lakes School District.</p> <p>The WAPS Charter School Manual does not establish timelines for the charter school's preoperational year (p. 23), and the WAPS New Charter Ready To Open Task List contains blank fields for completion dates of tasks but does not indicate any deadlines for ready to open milestones. For transparency with schools it would be helpful to clarify and indicate the expectations for when certain tasks should be achieved.</p>	
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### Measure B.3 - Contract Term, Negotiation and Execution

*The applicant has contracts that clearly define material terms and rights and responsibilities of the school and the authorizer.*

Essential Elements <i>(required to be addressed)</i>	Fully Addressed? (Yes/No)
<p>Submit a charter contract template that meets the following elements:</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> All current statutory requirements per Minnesota Statutes, section 124E.10, subdivisions 1(a-b) and 3(c).</li> <li><input type="checkbox"/> Clearly state the rights and responsibilities of the school and the authorizer.</li> </ul>	No
Describe a plan to establish contract outcomes/goals that are specific and strategic, measurable, attainable, results-based, and time-bound.	Yes

Describe the process for how the applicant's new charter school contract(s) will be completed within 45 business days of the commissioner's approval of the applicant's affidavit and the applicant will submit to the commissioner a copy of the signed contract within 10 business days of its execution.	No
Describe how existing contract(s) will be fully executed no later than the first date of the renewal period and submitted to the commissioner within 10 business days of its execution.	No
Describe how contract(s) will be amended for material contract changes, when applicable, and submitted to the commissioner within 10 business days of its execution.	Yes
<b>Advanced Element</b> <i>(not required to be addressed)</i>	<b>Fully Addressed?</b> <b>(Yes/No)</b>
Identify how the applicant's contract term, negotiation and execution decision-making processes are designed to promote high quality charter schools and align with national quality authorizing principles and standards.	No
<b>Review Comments</b>	<b>Rating</b>
<p>The measure is discussed in the revised Part B narrative (pp. 8-9), and the Charter Contract Template (two different versions submitted).</p> <p>A copy of NACSA's Principles and Standards was also provided, as well as copies of MDE's Annual Charter School Assurances document, Annual Charter School Assurances Instructions, and Charter School Website Requirements Checklist.</p> <p><b>Deficiency and Action:</b></p> <p>The Part B narrative states: "Time lines are indicated for each application a charter would complete. These dates are communicated with interested schools as well as schools currently authorized by Winona Area Public Schools to ensure compliance with all deadlines. These timelines are listed in the Winona Area Public Schools Charter School Manual and often reference statute. For example, a new charter references Minnesota's Charter School of Law (Minnesota Statute 124E.06, Subdivision 4) and lists the following information in the timeline" (p. 8). The narrative then outlines a version of the renewal process, concluding with the deadline for submitting a supplemental affidavit (pp. 8-6). Neither of these processes (contract renewal and supplemental affidavits) are related to the new charter school affidavit process outlined in Minnesota Statutes, section 124E06,</p>	<b>Deficiency and Action</b>

<p>subdivision 4. Moreover, measure A.3 is about contracting, not affidavits – each follow different statutory timelines. The timeline and process for contracting, such as contract negotiations and approval by the boards of the contracting parties, are not provided. The process WAPS will use to ensure the statutory timelines provided in Minnesota Statutes, section 124E.10, subdivision 1(a) are met is not described.</p> <p>In order to verify the charter contract meets all requirements of Minnesota Statutes, section 124E.10, MDE requested templates of the following attachments stated in the charter contract (pp. 11-12): A. Statement of Assurances Signed by All Charter School Board Members; B. On-Going Evaluation Criteria, Process &amp; Procedures; C. Performance Evaluation of School; D. Range of Possible Interventions (if different from pp. 16-17 of Charter Schools Manual); and G. Charter School Annual Review (if different from Charter Annual Assessment Rubric). These templates were not provided by WAPS in its resubmission. A second charter contract template, dated 05/28/20, was submitted with different contract attachments listed (p. 3). Templates of these attachments were also not provided. As such, MDE cannot verify that either contract template meets the requirements for charter contracts in Minnesota Statutes, section 124E.10.</p>	
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## Measure B.4 - Performance Standards

*The applicant has a performance framework under which it executes contracts with clear, measurable and attainable performance standards.*

Essential Elements <i>(required to be addressed)</i>	Fully Addressed? (Yes/No)
Develop a performance framework that states the primary purpose of the charter schools in its portfolio is to improve all pupil learning and all student achievement and identifies additional purposes per Minnesota Statutes, section 124E.01, subdivision 1, and Minnesota Statutes, section 124E.10, subdivisions 1(a)(1) and 1(a)(2).	No
Develop a performance framework that defines clear, measurable and attainable academic, operational and financial performance standards for all schools in its portfolio per Minnesota Statutes, section 124E.10 and consequences for meeting or not meeting performance standards.	No
Develop a performance framework that is designed to at least meet the outcomes adopted by the commissioner for public school students, including world's best workforce goals under section 120B.11, subdivision 1 per Minnesota Statutes, section 124E.10,	No

<p>subdivision 1(c). The commissioner’s outcomes for public school students are the five goals of World’s Best Workforce:</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> All children are ready for school.</li> <li><input type="checkbox"/> All third-graders can read at grade level.</li> <li><input type="checkbox"/> All racial and economic achievement gaps between students are closed.</li> <li><input type="checkbox"/> All students are ready for career and college.</li> <li><input type="checkbox"/> All students graduate from high school.</li> </ul>	
<p style="text-align: center;"><b>Advanced Element</b> <i>(not required to be addressed)</i></p>	<p style="text-align: center;"><b>Fully Addressed?</b> <b>(Yes/No)</b></p>
<p>Identify how the performance framework is designed to promote high quality charter schools and align with national quality authorizing principles and standards.</p>	<p style="text-align: center;">No</p>
<p style="text-align: center;"><b>Review Comments</b></p>	<p style="text-align: center;"><b>Rating</b></p>
<p>The measure is discussed in the revised Part B narrative (pp. 10-11) and the Charter Annual Assessment Rubric (two different versions submitted).</p> <p><i>Please note: MDE’s review of this measure focuses on the Charter Annual Assessment Rubric and related narrative. The Renewal Assessment Rubric and related narrative is evaluated in measure B.9 below.</i></p> <p><b>Clarification and Action:</b></p> <p>Two different versions of the Charter Annual Assessment Rubric were submitted. Neither rubric specifically addresses how additional purposes will be evaluated (p. 2). Additionally, it is not clear how the World’s Best Workforce goal areas of “All children are ready for school” and “All third-graders can read at grade level” are included in the performance framework.</p> <p>It is unclear if WAPS plans to use its Charter Annual Assessment Rubric as well as performance outcomes in the charter contract as part of its performance framework or if the items in the Charter Annual Assessment Rubric will be the performance framework within the contract. The contract template dated 05/28/20 mentions an Exhibit G: “Academic &amp; Non Academic Pupil Performance Outcomes/Goals” (p. 3) – it is unclear if this is the same as the Charter Annual Assessment Rubric.</p> <p><b>Continuous Improvement Notes:</b></p> <p>For measure F.1, WAPS requires that the audit was done by a qualified and independent external auditor; however, the WAPS rubric does not account for any findings within the</p>	<p style="text-align: center;"><b>Clarification and Action</b></p>

<p>audit. Please consider how WAPS would account for findings/material weaknesses if identified in a charter school's audit.</p> <p>The WAPS Charter Annual Assessment Rubric attached to this measure could be strengthened with an analysis of charter school cash flow in the fiscal management section, and a review of ongoing board governance that addresses strategic planning and review of existing school policies and bylaws, for example, and not just "processes and procedures for creating and implementing new policies" (measure G.2).</p>	
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## Measure B.5 - Processes for Ongoing Oversight of the Portfolio of Charter Schools

*The applicant has processes to monitor and oversee the schools in its portfolio in the areas of academic, operational and financial performance.*

<b>Essential Elements</b> <i>(required to be addressed)</i>	<b>Fully Addressed?</b> <b>(Yes/No)</b>
Describe the criteria, processes and procedures the applicant will use to monitor and evaluate the fiscal, operational and academic performance, consistent with subdivision 3, paragraphs (a) and (b) per Minnesota Statutes, section 124E.10, subdivision 1(a)(7).	No
Describe the charter schools' required academic, financial and operational reporting to the applicant.	No
Describe an oversight plan that clearly establishes the criteria, processes and procedures the applicant will use to evaluate performance and monitor compliance, ensure school autonomy and protect student rights.	No
Describe how the applicant's ongoing oversight informs its standards and processes for intervention, termination and renewal decisions for its portfolio of charter schools (i.e. performance measures B.6 and B.9).	No
<b>Advanced Element</b> <i>(not required to be addressed)</i>	<b>Fully Addressed?</b> <b>(Yes/No)</b>
Identify how the applicant's ongoing oversight of the portfolio of charter schools is designed to promote high quality charter schools and align with national quality authorizing principles and standards.	No

Review Comments	Rating
<p>The measure is discussed in the revised Part B narrative (pp. 12-14), revised WAPS Charter School Manual (pp. 13-15), Charter Annual Assessment Rubric (two different versions submitted), B. 5 Ongoing Oversight – Fiscal Affairs narrative, and the Charter Contract (two different versions submitted).</p> <p><i>Please note: Review of the charter contract templates is provided in measure B.3 above. Review of the charter annual assessment rubrics is provided in measure B.4 above.</i></p> <p><b>Clarification and Action:</b></p> <p>The Part B narrative provides references to the charter contract; however, these references are inconsistent with the charter contracts provided (two different charter contract templates were submitted). This occurs when the narrative references sections 4, 5, 6, 15, 18, expectations related to conflicts of interest, and the quoted language for section 6.2, which is not a direct quote from either charter contract (narrative, pp. 12-13). These inconsistencies remain unresolved.</p> <p>The plan for site visits presented in narrative for this measure and in the Charter Schools Manual is inconsistent with the narrative for measure B.6, which states “Monitoring consists of three total site visits. There will be two informal visits and one formal Annual Site Visit (or Renewal Site Visit, as the case may be)” (p. 15). Measure B.5 provides three types of site visits: Annual, Ongoing Monitoring, and Renewal (which replaces Annual in the renewal year) (narrative, p. 14; manual, pp. 14-15). The Ongoing Monitoring Site Visit in B.5 is presented as optional (“may”) while the informal site visit from B.6 is presented as mandatory (“will”). The expectations for types and amount of site visits remain unclear.</p> <p><b>Continuous Improvement Notes:</b></p> <p>The B. 5 Ongoing Oversight – Fiscal Affairs narrative could be incorporated into the Part B narrative document instead of being a separate attachment.</p> <p>Please consult MDE’s Guidance for Contracts with Management Organizations (CMO/EMO Guidance) available on <a href="#">MDE’s Authorizer Resources webpage</a> to consider how WAPS might conduct its monitoring, oversight and evaluation practices if an authorized school contracts with a management organization.</p>	<p><b>Clarification and Action</b></p>

## Measure B.6 - Standards and Processes for Interventions, Corrective Action and Response to Complaints

*The applicant has clear and comprehensive standards and processes to address complaints, interventions and corrective action.*

<b>Essential Elements</b> <i>(required to be addressed)</i>	<b>Fully Addressed?</b> <b>(Yes/No)</b>
Describe the standards, procedures and processes to address and resolve complaints, including forms if applicable.	Yes
Describe the standards, procedures and processes for intervention and corrective action.	Yes
Describe how the applicant's standards and processes for intervention, corrective action and response to complaints align with its ongoing oversight of the portfolio of charter schools (i.e. performance measure B.5).	Yes
<b>Advanced Element</b> <i>(not required to be addressed)</i>	<b>Fully Addressed?</b> <b>(Yes/No)</b>
Identify how the applicant's standards and processes for interventions, corrective action and response to complaints are designed to promote high quality charter schools and align with national quality authorizing principles and standards.	No
<b>Review Comments</b>	<b>Rating</b>
<p>The measure is discussed in the revised Part B narrative (p. 18), revised WAPS Charter School Manual (pp. 16-18), and the link to the <a href="#">WAPS Complaint Form</a>.</p> <p><b>Continuous Improvement Notes:</b></p> <p>The narrative for B.6 contains an outdated statutory reference.</p> <p>Please note that incorrect Charter School Manual page numbers and folder number are provided in the data source table in the Part B narrative (p. 17).</p> <p>As noted above in section A.3 of the review rubric, the WAPS Online Complaint Form available on Google Drive is not secure (link provided in B.6 narrative, pp. 16-17), and risks exposure of nonpublic data to the public, because users can read complaints submitted. The process therefore does not comply with the Minnesota Government Data Practices Act (Minnesota Statutes, Chapter 13).</p>	<b>Satisfactory</b>

## Measure B.7 - Charter School Support, Development and Technical Assistance

*The applicant has an established process to support its portfolio of charter schools through intentional assistance and development offerings.*

Essential Elements <i>(required to be addressed)</i>	Fully Addressed? (Yes/No)
Describe the plan to provide proactive support, development and technical assistance to charter schools.	Yes
Describe how the support, development and technical assistance will be provided in a variety of areas and in a manner to preserve school autonomy.	Yes
Review Comments	Rating
The measure is discussed in the revised Part B narrative (p. 18), revised WAPS Charter School Manual (p1. 5, 11), WAPS Board Policy 104, Resources document ( <a href="#">via hyperlink</a> ), and Charter School Assistance Plan.	Satisfactory

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

*The applicant has an established process to promote, within its portfolio, the model replication and dissemination of best practices of high performing charter schools.*

Essential Element <i>(required to be addressed)</i>	Fully Addressed? (Yes/No)
Describe a clear plan for successful model replication and dissemination of best practices of high performing charter schools, including how models/practices will be identified.	Yes
Review Comments	Rating
The measure is discussed in the revised Part B narrative (p. 20) and the <a href="#">WAPS website</a> .  <b>Continuous Improvement Note:</b>	Satisfactory

The WAPS Charter School Authorization webpage contains a section for Charter School Best Practices; however, none of the links appear to be related to best practices from WAPS authorized schools, nor is there a sub-section to prompt the inclusion of such practices. Since the Part B narrative states “Both the charter school and the authorizer’s websites will be updated at least monthly, highlighting an example of successes and/or achievements of its charter schools” (p. 20), it would be reasonable for this section of the website to contain these examples of successes and/or achievements.	
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## Measure B.9 - Charter School Renewal or Termination Decisions

*The applicant has clear and comprehensive standards and processes to make high stakes renewal and termination decisions. The applicant outlines charter school renewal and termination decision standards and processes that will promote the growth of high quality charter schools.*

Essential Elements <i>(required to be addressed)</i>	Fully Addressed? (Yes/No)
<p>Describe comprehensive evaluative standards, procedures, timelines and review processes to evaluate a school’s academic, operational and financial performance for high-stakes merit-based renewal and termination decisions consistent with Minnesota Statutes, section 124E.10, subdivisions 1(a)(7), 1(a)(8), 1(a)(13), 1(a)(14), 1(c) and subdivision 3(a) and include the following:</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> The criteria, processes, and procedures the authorizer will use to monitor and evaluate the fiscal, operational, and academic performance, consistent with subdivision 3, paragraphs (a) and (b) per Minnesota Statutes, section 124E.10, subdivision 1(a)(7).</li> <li><input type="checkbox"/> The formal written performance evaluation that is a prerequisite for reviewing a charter contract under subdivision 3 per Minnesota Statutes, section 124E.10, subdivision 1(a)(8).</li> <li><input type="checkbox"/> The specific conditions for contract renewal that identify the performance of all students under the primary purpose of section 124E.01, subdivision 1, as the most important factor in determining whether to renew the contract per Minnesota Statutes, section 124E.10, subdivision 1(a)(13).</li> <li><input type="checkbox"/> The additional purposes under section 124E.01, subdivision 1, and related performance obligations under clause (7) contained in the charter contract as additional factors in determining whether to renew the contract per Minnesota Statutes, section 124E.10, subdivision 1(a)(14).</li> <li><input type="checkbox"/> Standards and process to evaluate the school’s performance to at least meet the outcomes adopted by the commissioner for public school students, including</li> </ul>	No

<p>world's best workforce goals under section 120B.11, subdivision 1 per Minnesota Statutes, section 124E.10, subdivision 1(c).</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Standards for determining consequences for meeting or not meeting performance standards.</li> <li><input type="checkbox"/> The authorizer shall provide a formal written evaluation of the school's performance before the authorizer renews the charter contract per Minnesota Statutes, section 124E.10, subdivision 3(a).</li> </ul>	
Describe the school closure plan and describe the applicant's role in the orderly closure of a school in the event of revocation, non-renewal or voluntary relinquishment of the charter per Minnesota Statutes, section 124E.10, subdivision 1(b), subdivision 4 and subdivision 6.	No
<b>Advanced Element</b> <i>(not required to be addressed)</i>	<b>Fully Addressed?</b> <b>(Yes/No)</b>
Identify how the applicant's charter school renewal and termination decision-making processes are designed to promote high quality charter schools and align with national quality authorizing principles and standards.	No
<b>Review Comments</b>	<b>Rating</b>
<p>The measure is discussed in the revised Part B narrative (pp. 21-23), revised WAPS Charter School Manual (pp. 10, 19-20, 25-27, 31), revised Renewal Assessment Rubric, Renewal Process document, and two versions of the Charter Contract Template (one dated 02/18/20 and one dated 05/28/20).</p> <p>The Renewal Application and Charter School Closure Plan from the previous submission were not resubmitted.</p> <p><b>Deficiency and Action:</b></p> <p>The Charter School Manual outlines a Renewal Application process, which formally begins with a Letter of Intent from the charter school followed by a Renewal Application, Initial Review, Revisions (if applicable), Institutional Review and Final Determination (pp. 19-20, p. 25). The Charter School Manual then provides a link to a document titled "Winona Area Public Schools Renewal Process – FY20 Draft" (p. 26). This document is also included as part of the WAPS resubmission. This process differs from that presented in the Charter School Manual. For example, this process does not contain a Letter of Intent, and the renewal site visit (i.e., Institutional Review) occurs before reviewing the renewal application (Initial Review in Manual and Preliminary Report in process document).</p>	<b>Deficiency and Action</b>

According to the Charter School Manual, the Institutional Review, which would include a site visit, occurs only after the application has been submitted and at least 90% of all rubric items have been met (p. 14). The Manual then states “Those applications not meeting this requirement may be allowed 30 days to make revisions” (p. 14). However, in the Renewal Process document, the site visit occurs before the application is reviewed, and the preliminary renewal evaluation is sent to the school for “review and comment,” not revisions. Moreover, the expansion process includes renewal as part of the process (see measure B.2 above for details). As such, a consistent renewal application process is not reflected in the WAPS submission.

Additionally, the criteria for charter contract renewal is unclear. Related to the concerns above, it is unclear whether the Renewal Assessment is based on the school’s performance over the term of the contract (Manual, p. 11) or the Renewal Application (p. 14). Within the Renewal Assessment Rubric itself, it is unclear how reviewers will determine if measures have been met or not, or satisfactorily or unsatisfactorily addressed, as there is no criteria for making this determination. Based on the Renewal Guidelines provided in the Charter School Manual (pp. 26-27), length of renewal would be based on a school’s current Level according to the table of Interventions provided on pages 16-17. A school’s Level is determined by the Charter Annual Assessment Rubric, of which there are two versions in the resubmitted application; it is unclear how this rubric informs the Renewal Assessment Rubric or decision-making. Further, the Part B.9 narrative states “each year the Annual Assessment Rubric is provided as written feedback for the authorized charters. These completed annual rubrics and cumulative records regarding the four indicators provide data that contributes to making informed decisions about the performance of charter schools.” (p. 22). As such, it is unclear how completed Annual Assessment Rubrics throughout the contract term inform the Renewal Assessment Rubric or decision-making, as the Renewal Guidelines are based on the current year. A consistent renewal evaluation process and guidelines for contract renewal determination are not reflected in the WAPS submission.

A revised Renewal Application was not resubmitted by WAPS. The previously submitted Renewal Application provided information on how to calculate demand (p. 3). It’s unclear why this information is included, as the application does not include any questions about student/parent demand or enrollment.

The Renewal Assessment Summary section allows for the Approval of “Renewal with Expansion,” “Mutual Non-renewal” or “Renewal” with the new contract term length provided. It’s unclear why “Renewal with Expansion” is included as an option: it is also unclear what is meant by “Renewal with Expansion.” In statute, adding grades, sites or early learning programs to an existing charter school requires a supplemental affidavit process and MDE approval (Minnesota Statutes, section 124E.06, subdivision 5). Additionally, it’s unclear why unilateral closure/non-renewal for cause is not provided as

an option, consistent with the Renewal Guidelines included in the Charter School Manual (p. 27).

A revised Charter School Closure Plan was not resubmitted by WAPS. The previously submitted Charter School Closure Plan references “days” instead of “business days,” which are commonly used in Minnesota Statutes, Chapter 124E. Please review WAPS closure plan as it relates to statutory timelines, specifically, Minnesota Statutes, section 124E.10, subdivision 6(b). Additionally, the WAPS closure plan must comply with Minnesota Statutes, section 120A.22, subdivision 7(c), which states: “A school district, a charter school, or a nonpublic school that receives services or aid under sections 123B.40 to 123B.48 that transmits a student's educational records to another school district or other educational entity, charter school, or nonpublic school to which the student is transferring must include in the transmitted records information about any formal suspension, expulsion, and exclusion disciplinary action under sections 121A.40 to 121A.56. The district, the charter school, or the nonpublic school that receives services or aid under sections 123B.40 to 123B.48 must provide notice to a student and the student's parent or guardian that formal disciplinary records will be transferred as part of the student's educational record, in accordance with data practices under chapter 13 and the Family Educational Rights and Privacy Act of 1974, United States Code, title 20, section 1232(g).” These deficiencies remain unresolved.