



Minnesota Office of Charter Authorizing

Commissioner-Approved Authorizing Plan

Effective: 19 August 2019

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Part A Measures: Authorizer Capacity and Infrastructure

Measure A.1 – Authorizer Mission: *The authorizer has a clear and compelling mission for charter school authorizing.*

Guiding Questions:

- Identify the applicant's clear and compelling mission and indicate how it fully aligns with [Minnesota Statutes §124E](#)
- Describe how authorizing charter schools realizes the applicant's mission

Mission

Minnesota Office of Charter Authorizing *supports and advances the purposes of charter school law*¹ by serving as a single-purpose authorizer whose mission is to improve *all* pupil learning and *all* student achievement.

Mission Alignment with Minnesota Statutes §124E. Charter Schools

Minnesota Office of Charter Authorizing's mission - improve *all* pupil learning and *all* student achievement - is compelling, necessary and essential for charter school authorization because the mission is fully aligned with Minnesota's primary statutory purpose for charter schools: to improve *all* pupil learning and *all* student achievement ([Minnesota Statutes §124E.01, Subd. 1](#)), by:

- (1) increasing learning opportunities for all pupils;
- (2) encouraging the use of different and innovative teaching methods;
- (3) measuring learning outcomes and creating different and innovative forms of measuring outcomes;
- (4) establishing new forms of accountability for schools; or
- (5) creating new professional opportunities for teachers, including the opportunity to be responsible for the learning program at the school site.

Authorizing Realizes the Mission

As a single-purpose authorizer of charter schools, the Minnesota Office of Charter Authorizing oversees schools through consistent, ongoing and thorough evaluation. Authorizing charter schools is the sole means by which MOChA can realize the mission.

Measure A.2 - Authorizer Organizational Goals: *The applicant has clear organizational goals and time frames for achievement that are aligned with its authorizing mission and Minnesota charter school statute.*

¹ Fundamentally and structurally, MOChA's standards for quality charter school authorizing are based [NACSA's Principles and Standards for Quality Charter School Authorizing](#), Revised 2018 (hereafter as [Principles and Standards](#)).

Guiding Questions:

- Identify the applicant's comprehensive vision for charter school authorizing and indicate how it fully aligns with Minnesota Statutes §124E.
- Identify the applicant's measurable organizational goals that align with the applicant's chartering vision including the criteria and timeframe for achievement

Advanced Guiding Questions:

- Explain how the applicant will regularly evaluate its work against its chartering vision and organizational goals
- Explain how the applicant will implement improvement plans if falling short of its vision and organization goals

MOChA's vision is: to establish a network of high-quality chartered schools through a system of standards-based² accountability measures, thereby improving *all* pupil learning and *all* student achievement.

Vision Alignment with Minnesota Statutes §124E

Minnesota Office of Charter Authorizing's vision is fully aligned with Minnesota's primary statutory purpose for charter schools: to improve *all* pupil learning and *all* student achievement (Minnesota Statutes §124E.01, Subd. 1).

MOChA's Organizational Goals advance the vision as well as the primary statutory purpose:

- Improve *all* pupil learning and *all* student achievement by increasing school performance - academic, operational, and fiscal - through high standards and the implementation of a system of standards-based accountability measures.

Related and aligned with NACSA³, MOChA goals include safeguarding:

1. The rights of *all* students to have equitable access to the schools of their choice, to receive appropriate services, and to be treated fairly;
2. The public interest in ensuring that publicly funded programs are accountable, transparent, well governed, efficient, and effectively administered; and
3. The autonomy of charter school operators, giving them the freedom to control core functions.

MOChA will operationalize the organizational goals and benchmark success within timeframes:

1. *Primary Purpose.* Improving *all* pupil learning and *all* student achievement will be measured annually based on data performance reports on state assessments that measure proficiency and growth. Through quality oversight and monitoring, MOChA authorized schools will improve *all* pupil learning and *all* student achievement and post higher proficiency and growth rates than comparable schools with similar demographics.
2. *Replication.* MOChA will actively solicit new charter school applications that replicate high performing schools. Target: 2 per annum. Such replication accelerate the growth of the portfolio of schools that improve *all* pupil learning and *all* student achievement.

² Specifically: NACSA's Principles and Standards.

³ NACSA, Principles and Standards, p. 6.

3. *Community.* MOChA will actively solicit new charter school applications by reaching out to Minnesota networks of organizations focused and dedicated to improving learning for *all* students, especially organizations that advocate for traditionally underrepresented students and thereby collaborate and leverage resources to improve *all* pupil learning and *all* student achievement. MOChA representatives (including board members) will host 2 meetings annually for community-based organizations (e.g., HAP, ARC, SCS, Wilder Foundation, Minneapolis Foundation, BUSH Foundation, etc.) who advocate for students/education. Also, MOChA representatives will attend a minimum of 6 community-based meetings and/or conferences per annum hosted by community organizations that advocate for traditionally underrepresented students.
4. *Teachers.* MOChA will actively solicit new charter school applications through networks of organizations that advocate for the development of professional opportunities for teachers (cf. Minnesota Statutes §124E.01, Subd. 1(5)), who are committed to the goal to improve *all* pupil learning and *all* student achievement. MOChA will post opportunities monthly at www.themocha.org and present the MOChA authorizing opportunity at two conferences annually (e.g., Education Evolving, Center for Teacher Quality, etc.).
5. Consistently, and upon MDE review, MOChA will achieve the highest possible designation in special reference to the Minnesota Authorizer Performance Evaluation System (MAPES). Annually, MOChA will assess progress towards attaining the goals (cf. A.9: Authorizer Self-Evaluation, below).

Improvement

Through consistent, transparent and comprehensive oversight (see further in Section B.5), MOChA is committed to authorizing and monitoring schools that improve learning for *all* students by increasing school performance - academic, operational, and fiscal - through high standards and the implementation of a system of standards-based accountability measures. MOChA will utilize reflective practices to maintain an environment of ongoing and purposeful improvement. *Improvement decisions must be based on an accumulation of evidence, data, and expertise and have a high probability that will result in stronger student outcomes.*

If authorized schools are underperforming and not meeting Charter Contract goals, MOChA's mission becomes a precarious proposition. In these instances - whether the concern is academic, financial, and/or operational - MOChA will evaluate whether authorizer internal systems - monitoring and resource allocation including technical assistance - are adequate to monitor schools. That is, is the monitoring frequency adequate, is the MOChA feedback to schools (including interventions, see B.6 below) adequate and sufficient? And is the technical guidance to schools adequate and focused, while safeguarding the autonomy of the school? And is the mitigating concern isolated, a pattern (in a school or within the portfolio)? To be sure, MOChA will monitor and, if necessary, adjust (including developing and implementing an improvement plan) before the issue are acute and chronic. Improvement must not be adhoc, rather, restated: *Improvement decisions must be based on an accumulation of evidence, data, and expertise and have a high probability that will result in stronger student outcomes.* See further at: Measure A.9 - Authorizer Self-Evaluation of Capacity, Infrastructure and Practices.

Measure A.3 - Authorizer Structure of Operations and Measure A.4 - 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

Guiding Questions:

- 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 in charter schools, curriculum, instruction, management, facilities, finance and law, the full-time equivalencies of those positions and the financial resources available to fund the positions
- Describe how the applicant will manage and safeguard information, data and records related to authorizing
- 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

Organizational Structure

MOChA is governed by a Board of Directors; members serve voluntarily. All Directors have expertise that collectively ensures strong governance and all members have extensive and extensive experience in chartered schools(see A.3/4.1. MOChA Board Resumés). The Board of Directors establish budgets, set policies and articulate the practices, processes, and procedures for MOChA. Also, the Directors retain, support, and evaluate MOChA staff who manage the day-to-day work of serving authorized schools.

Current and future Directors will collectively have the expertise and experience to make informed, critical and timely decisions.

Area	Board Members (see key)				
	1	2	3	4	5
• Charter schools	E	E	E	E	E
• Curriculum	E	E	E	N	S
• Instruction	E	S	E	N	S
• Management	S	E	E	E	E

• Facilities	S	E	S	E	E
• Finance	S	E	E	E	E
• Law	S	E	E	S	E

N = None | S = Some | E = Extensive

MOChA Board Members, Key

1. M. Houtz, Secretary
2. J. Martini, Treasurer
3. D. Peterson, Chair
4. S. Sheik-Abdi, Director
5. K. Xiong, Director

MOChA will enlist expertise and competent leadership for all areas essential to charter school oversight, including, but not limited to, education leadership; curriculum, instruction, and assessment; special education, English learners, and other diverse learning needs; performance management and accountability; law; finance; facilities; and nonprofit governance and management. Commensurately, all staff will be hired based on demonstrable expertise and experience as well as a deep understanding and committed to the three NACSA Core Principles of authorizing.

Staffing levels will be appropriate and sufficient to carry out all authorizing responsibilities in accordance with national standards and commensurate with the scale of the charter school portfolio.

Anticipated staff include an Executive Director, a Managing Director as well as contracts with Advisors based on requisite expertise needed to review materials and engage in ongoing oversight and accountability.

Executive Director

Reports to: Executive Board

Direct Reports: Managing Director; Contracted Advisors

Basic Job Function: The Executive Director manages and oversees the MOChA's efforts to conduct oversight and evaluation of authorized schools as well as review new school applications, affidavits, and Change in Authorizer requests. The Director is responsible to ensure that the MOChA implements the charter school authorizing responsibilities with fidelity, advancing the mission and vision of MOChA.

Primary Duties and Responsibilities

- Oversees all activities of MOChA
- Provides strategic leadership for MOChA , advancing the quality of authorizing
- Ensures effective policies and procedures are in place that support effective authorizing
- Ensure an effective process is in place and implemented to consider new school proposals and change of authorizer applications
- Ensure an effective process is in place and implemented to evaluate expansion requests from current schools
- Ensure an effective process is in place and implemented to conduct contract renewal decision
- Develops performance charter contracts for new schools, transfer schools, and contract renewals

- Leads external engagement activities for MOChA related to charter school authorizing: MDE, NACSA, MACS, MACSA, Media, Legislature, etc.
- Provide leadership, guidance, and information, including making recommendations to the MOChA Board of Directors to ensure effective decision-making related to new school proposals, transfer requests, expansion requests, contract renewals and contract terminations and non renewals
- Develop and manage the MOChA budget
- Respond to all MDE requirements and prepare requisite reports
- Evaluate charter schools' performance in the areas of academics, finance, operations and learning program
- Serve as primary contact for schools in the MOChA portfolio
- Implement and oversee school interventions as appropriate

Qualifications

- Current MN teacher license, preferred. An advanced degree is preferred
- A commitment to the teaching profession and advancing professionalism
- Minimum of three years of experience in school leadership
- Experience working in or with charter schools in Minnesota
- Demonstrated knowledge of and experience in charter school governance, operations, finance, and law
- Facile working experience and knowledge of academic and financial performance measures
- Experience with program evaluation
- Experience using multiple data points to evaluate student learning and academic performance
- Excellent oral and written communication skills
- Excellent computer skills
- Strong leadership and problem solving skills
- Demonstrated ability to work both independently and collaboratively
- Ability to manage multiple priorities on an ongoing basis
- Experience leading a team, supervising and supporting staff in an educational setting
- Experience setting and managing organizational budgets and cash flow
- Experience developing and advancing organizational strategic plans
- Experience working with community-based organizations to advance opportunities for underserved families and students
- Commitment to advancing high quality schools especially for underserved families/students
- Commitment to advancing professional opportunities for teachers

Managing Director

Reports to: Executive Director

Basic Job Function: The Managing Director manages the work flow required for new school applications, transfer requests, expansion requests, renewal decisions as well as the requisite compliances required for authorized schools.

Primary Duties and Responsibilities

- Gather, organize, and format school application materials for review
- Gather and organize state level academic data for review
- Gather and organize financial data from MN funding reports and school audits
- Review and gather relevant data from school websites, board policies, and key documents related to school wide operations

- Synthesize portfolio wide performance data for internal documents and key publications, such as the MOChA annual report
- Manage systems for gathering documents and monitoring compliance
- Organize and manage cloud and certificate-based databases and files (encrypted and secure).
- Coordinate internal and external communication between the MOChA and charter schools
- Review and edit documents prior to submission to schools, MDE, etc.
- Schedule and maintain MOChA staff, Advisors, school visit, office, and other calendars
- Develop, organize, and manage logistics and administrative tasks for MOChA events, activities, and communications
- Develop and monitor key MOChA processes and project timelines
- Implement invoicing and tracking of charter school authorizer fees
- Provide initial point of contact for MOChA in a professional manner (visitors and phone)
- Manage office procedures and systems, including supplies, equipment, and mail

Qualifications

- Bachelor degree, preferred
- Five years of administrative experience
- Three years of experience in charter schools
- Experience in database management and development
- Demonstrated proficiency in word processing, spreadsheet design and use, desktop publishing, and Adobe cloud-based products
- Outstanding written and oral communication skills
- Exceptional organizational skills
- Strong customer service skills
- Thoroughness and attention to detail
- Knowledge of administrative and clerical procedures
- Commitment to advancing high quality schools especially for underserved families/students
- Commitment to advancing professional opportunities for teachers

Advisors

Reports to: Executive Director

Basic Job Function: Advisors evaluate applications, conduct a variety of school interviews, evaluate school performance indicators, conduct oversight and evaluation of authorized schools, and make recommendations to the Executive Director.

Primary Duties and Responsibilities

- Evaluate charter school applications in special reference to academics, finance, and operations
- Review school reports and documents
- Conduct site visits to schools for evaluation and monitoring purposes
- Attend and report on school board meetings
- Review and analyze relevant academic, financial, and operations data
- Complete written evaluation and site visit reports
- Develop recommendations for charter contract renewal or termination
- Contribute to evaluation and revision of policies, procedures, and documents
- Participate in coordinating charter school training and support activities
- Engage in ongoing professional development to advance skills and understanding in the area of charter school authorizing

Qualifications

- MN teacher license, preferred; advanced degree is preferred
- Experience in school leadership, preferred
- Experience working in or with charter schools in Minnesota
- Demonstrated knowledge of and experience in charter school governance, operations and law
- Understanding of academic and financial performance measures
- Experience with program evaluation
- Proficiency in cloud-based platforms
- Excellent oral and written communication skills
- Excellent computer skills
- Experience using multiple data points to evaluate student learning and academic performance
- Leadership and problem solving skills
- Strong organizational and analytical skills
- Demonstrated ability to work both independently and collaboratively
- Commitment to advancing high quality schools especially for underserved families/students
- Commitment to advancing professional opportunities for teachers

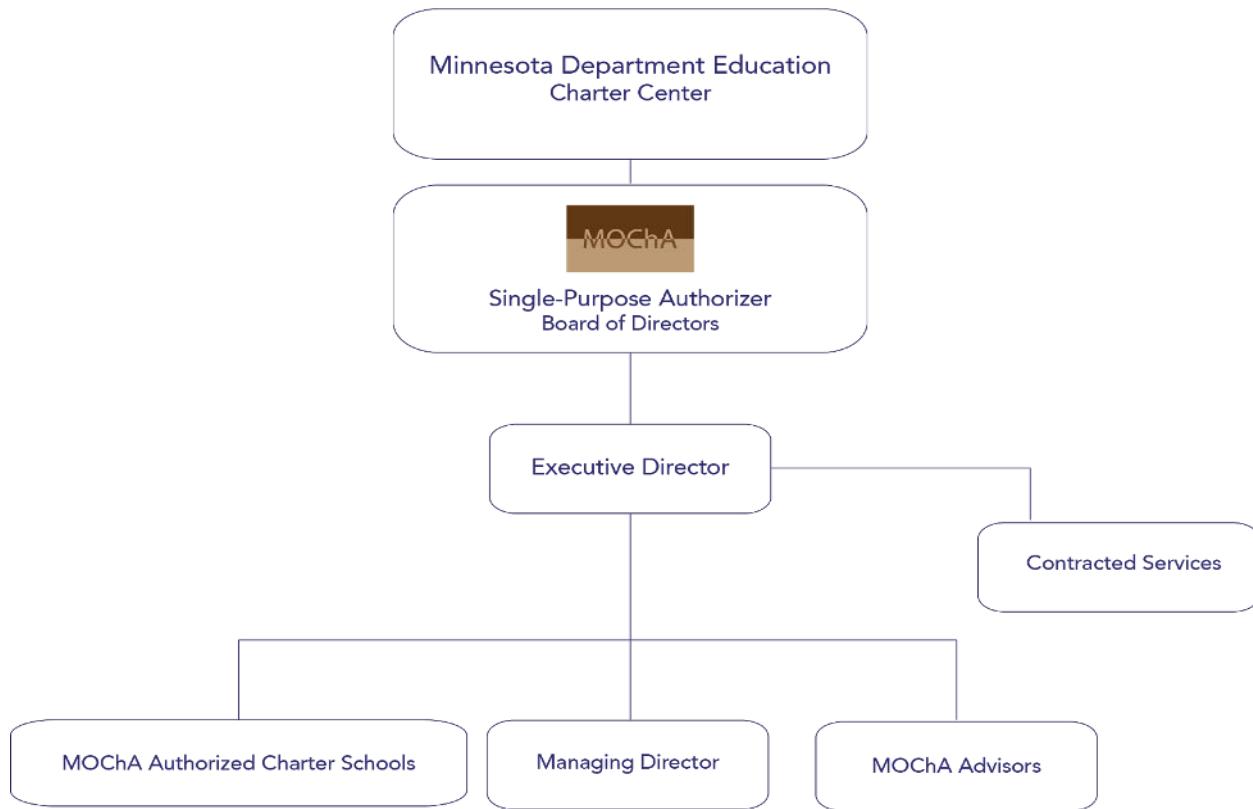
Reporting Protocols

The Executive Director reports to the Board of Directors; the Managing Director reports to the Executive Director; Advisors report to the Executive Director. All decisions in reference to Charter Contracts (approve and execute/deny, renewal, termination, CIA, etc.) are made by the Board of Directors based on materials prepared by the MOChA staff.

Evaluation

The Board of MOChA will evaluate the Executive Director on an annual basis using an evaluation instrument approved by the MOChA Board. The evaluation instrument will include items related directly to the primary duties of the position that are found in the job description, including, but not limited to leadership skills, management of duties, financial oversight of the organization, and supervision of MOChA staff. The Executive Director will evaluate all other MOChA staff members on an annual basis, using evaluation protocols approved by the Board. The results of the evaluations are intended to provide each employee with feedback designed to improve their skills and to increase the organization's capacity to meet its intended goals. The evaluations may also be used by the Board to inform personnel decisions including continued employment and compensation levels.

MOChA Organizational Chart



Growth Projections (cf. Five-year Budget)

Year 1 and Year 2 projections afford a part-time Executive Director, part-time Managing Director, and contracts with Advisors based on requisite expertise needed to review materials and engage in ongoing oversight and accountability. Subsequently, increases in portfolio size (revenue) will result in commensurate increases in staffing and contracting to maintain the FTE to portfolio ratio (below). MOChA will staff and contract (Advisors) who have the requisite skills sets including: Charter Schools, Curriculum, Instruction, Management, Facilities, Finance, and Law.

Commensurate to the fiscal commitments made to date, the MOChA board will continue to secure and allocate the necessary resources required to support the work delineated in the APP until the revenue generated by authorizer fees is sufficient to offset the expenditures.

Anticipated contract services include legal filings, accounting (including payroll), legal counsel (depending on need(s) and circumstance(s)), cloud and certificate-based digital ID software (see below, Information Management), and other services needed to fulfill legal and organizational goals.

	FY21	FY22	FY23	FY24	FY25
Transfer School	3	6	9	12	15
New School, Open	0	3	6	9	12
New School, Pre Op	3	3	3	3	3

Total	6	12	18	24	30
Staff FTE	.8	1.5	2.5	3	4
Ratio, FTE:Schools	8.0	8.0	7.2	8.0	7.5

In an effort to manage the anticipated growth, MOChA follows NACSA's (*Principles and Standards*) recommendation by establishing fixed, published application periods and deadlines to enable the authorizer to proactively plan and conduct a high-quality review process - integrated into MOChA's annual work calendar - rather than simply react to applications whenever they might arrive. The well-planned process includes minimum timeframes (see *MOChA Charter School Guide*).

Information Management

MOChA safeguards school and student information by:

1. All MOChA authorized schools will be contractually obligated to utilize cloud and certificate-based digital ID software platform for managing documents and compliance requirements.
2. MOChA envisages a Data Sharing Agreement with the Minnesota Department of Education. All MOChA board members, staff, and contractors will be trained in data privacy best practices and will review the agreement with MDE.
3. MOChA will subscribe to a cloud and certificate-based digital ID software to secure signatures (e.g., Charter Contracts, Assurances, etc.) and securely store documents (e.g., contracts, employment agreements, corporate documents, etc.). The platform must meet or exceed stringent security and legal compliance standards and be certified compliant with ISO 27001, SSAE SOC 2 Type 2, and PCI DSS.

Measure A.5 - Authorizer Capacity and Skill Development of Leadership and Authorizing 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.*

Guiding Questions:

- Describe the applicant's plan to offer professional development to authorizing leadership and staff
- Describe the frequency and nature of potential professional development as well as personnel expected to attend
- Describe how professional development will align with the applicant's operations, vision and goals for its portfolio of charter schools

Advanced Guiding Question:

- Describe how professional development will be measured, evaluated and customized to meet the needs of the authorizing leadership and staff

The MOChA board is guided by and committed to fulfill the three Core Principles espoused by NACSA:

1. Maintain high standards for schools

2. Uphold school autonomy
3. Protect student and public interests

Moreover, as a single-purpose authorizer, MOChA engages in chartering as a means to foster excellent schools that meet identified needs for *all* students, clearly prioritizes a commitment to fulfilling the primary purpose in Minnesota Statute §124E and to authorizing practices based on NACSA's Principles and Standards, and creates organizational structures that include adequate resources and assets necessary to conduct its authorizing duties effectively and efficiently.

Professional Development

MOChA is committed to developing and retaining staff to achieve and maintain high standards of professional authorizing practice, enable continual improvement. MOChA will allocate necessary and adequate resources to develop staff and build capacity through professional development.

Quarterly, the MOChA board and staff will review opportunities aligned to the organizations needs, building capacity and expertise.

- All staff will attend all required MDE training for authorizers.
- Minimally, one Board Director will attend required MDE training for authorizers.
- A MOChA representative will attend MDE Charter School 'Boot Camps'.
- As a member organization, a MOChA representative will attend monthly MACSA meetings.
- Annually, staff will be afforded the opportunity to attend the annual NACSA conference, NCA conference, or a mutually agreed upon (board approved) conference/meeting.
- Biennially, each Director will be afforded the opportunity to attend the annual NACSA conference, NCA conference, conference/meeting of choice, or participate in the Education Policy Fellowship Program (EPFP).
- Network with organizations that are committed to school improvement, e.g., The Design Principles fostered and advanced by the Bush Foundation and 2Revolutions, including grant opportunities for charter schools.
- ALL board members and staff will enroll in the NACSA 9-week Virtual Authorizer Bootcamp. This new platform is designed to share best practices while building capacity and includes the following topics:
 - Applications
 - Autonomy & Accountability
 - Problem of Practice
 - Ongoing Evaluation
 - Charter Renewal Part I
 - Ensuring Access for All & Closings
- At each Board of Directors meeting, the board will access a NACSA resource (e.g., Authorizer Voices).

In reference to conferences and meetings, the Board of Directors will discuss which panel discussions and sessions would be best suited to the needs of MOChA. Attendees will, in turn, formally report to colleagues and furnish resources to the Directors and staff. Attendees will evaluate the benefits of the professional development; these evaluations will determine future participation.

Alignment

Allocated resources of time, energy, and funding are intended to accomplish the following goals that are aligned with the mission, vision, and organizational goals. Specifically:

1. MOChA is dedicated to high-quality authorizer standards and practices. Professional development is essential to informing and improving practices.

2. School operations - transactional practices - are critical to the success of a school and are inextricably related to student achievement.
3. Understanding academic data (especially growth and proficiency) is critical to the primary purpose of improving *all* pupil learning and *all* student achievement.

Measuring the Effectiveness of Professional Development

MOChA is committed to not only encouraging board members and staff to engage in appropriate and relevant professional development experiences, but also to evaluating the effectiveness of these activities. This evaluation is part of a rigorous process designed to determine the most effective and cost efficient means to help MOChA maintain and improve their ability to provide high quality service to the schools authorized by the organization.

MOChA's evaluation format follows a research-driven model (Guskey, 2000, ASCD) to assess five different levels of effectiveness of professional development. By 1 May of each school year, each MOChA board or staff member who has participated in professional development activities during the school year will write a narrative summary including:

- A. A complete listing of the PD activities participated in to date;
- B. A narrative reflection on how these activities, either individually or collectively, have made a professional impact. The narrative should address at least one of the guiding questions for each of the five levels listed below.
- C. The Human Resources Committee of the Board of Directors will examine these reports at least once per year and no later than 1 August to monitor and evaluate the effectiveness of professional development activities.

Level 1: Participants' Reactions to Professional Development (PD): Guiding Questions include a) was their time well spent? b) will the learning from this PD experience be helpful to the individual? To the organization? How?

Level 2: Participants Learning: Guiding Questions: a) Did the participant(s) acquire the knowledge and skills that were intended by this PD experience? b) Describe the specific new concepts, knowledge and/or skills that were acquired.

Level 3: Organization Support and Change: Guiding Questions: a) How did MOChA as an organization support the member in acquiring new skills? b) What was the impact on the organization?, c) Were the results of the new learning communicated to others in the organization? (board of directors, staff, etc.).

Level 4: Participants' Use of New Knowledge and Skills: Guiding Questions: Did the MOChA member demonstrate the ability to implement the new knowledge and skills that were learned in the PD experience?

Level 5: Student Learning Outcomes: Guiding Questions: a) How did the PD directly advance MOChA's mission to improve *all* pupil learning and *all* student achievement? I.e., What impact on student achievement has happened, or might occur, as a result of the improvement in knowledge and skills attained by the MOChA member? Did it help the students' social or emotional growth? Are students more confident as learners?

Measure A.6 - Authorizer 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.*

Guiding Questions:

- Include the applicant's anticipated five-year budget (for example, FY 2017– FY 2022) outlining the following:
 - Anticipated revenue sources such as fees collected annually from schools and additional funds from outside sources
 - Anticipated expenditures such as staff, travel, consultants, office costs (e.g., equipment, supplies), etc.
 - Anticipated 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. **Important note:** this establishes the maximum portfolio size for the applicant's five-year term

Advanced Guiding Question:

- Describe how the applicant's budget shows resource allocations dedicated to achieving nationally recognized quality authorizing standards

The MOChA Board will allocate and deploy funds effectively and efficiently with the public's interests in mind. MOChA board members will determine the financial needs of the organization and devote sufficient financial resources to fulfill its authorizing responsibilities in accordance with national standards and commensurate with the size - actual and anticipated - portfolio of schools (cf. NACSA, *Principles and Standards*, p. 11).

The budget is attached as A.6.1. Authorizer Operational Budget and is a projection, reflecting anticipated growth. Projected expenditures are aligned to specific MAPES indicators.

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.*

Guiding Questions:

- Include the applicant's policy to address conflicts of interest in all decision-making processes concerning the portfolio of charter schools
- 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 applicant accountable for a school's performance

Minnesota Statutes §124E.10, Subd. 2 limits authorizer activity in charter school agreements due to potential conflicts of interest:

- (a) *A school must disclose to the commissioner any potential contract, lease, or purchase of service from an authorizer. The contract, lease, or purchase must be accepted through an open bidding process and be separate from the charter contract. The school must document the open bidding process. An authorizer must not enter into a contract to provide management and financial services to a school it authorizes, unless the school documents receiving at least two competitive bids.*
- (b) *An authorizer must not condition granting or renewing a charter on:*
 - (1) *the charter school being required to contract, lease, or purchase services from the authorizer; or*
 - (2) *the bargaining unit status of school employees.*

MOChA ensures that the application-review process and decision making are free of conflicts of interest, and requires full disclosure of any potential or perceived conflicts of interest between reviewers or decision makers and applicants (see Review Rubrics, B.1, B.2, and B.4 and B.9).

MOChA follows [MDE's Guidance on Conflict of Interest for Authorizers and Charter Schools](#) and addresses conflicts of interests via the Charter Contract and board approved policies and procedures.

The MOChA Charter Contract, Article II, addresses the relationship between the school and MOChA, stating in:

- Section 2.2. The Independent Status of the School, i.e., MOChA has no authority or control over operational, administrative, or financial responsibility for the School.
- Section 2.3. Financial Obligations Are Separate
- Section 2.4. No Authority to Obligate or Bind Other Party

Moreover, Article XI, Section 11.1. Contract Renewal, specifies that renewal decisions are merit-based, specifically whether or not the school has fulfilled the Statutory purpose: improve *all* pupil learning and *all* student achievement.

MOChA Policy

The MOChA Conflict of Interest Policy (A.7.1: Conflict of Interest Policy) includes prohibitions that vouchsafe the autonomy of the school: MOChA Board of Directors, staff, and advisors do not participate in any decision making at a MOChA authorized school. Moreover, MOChA Board of Directors, staff, and advisors are required to disclose any and all conflicts of interest.

Each director of MOChA shall disclose to the MOChA board of directors immediately upon learning that such director, or a member of the immediate family (as defined below) of such director, or an organization for which such director serves as a director, officer, or legal representative, has a material financial interest in any entity with which any charter school that is authorized by MOChA has a contractual or fiduciary relationship. Moreover, MOChA Board of Directors, staff, and advisors are required to disclose any and all conflicts of interest. Upon such disclosure, MOChA will take all action described in Minnesota Statutes Section 317A.255 with respect to such conflict.

For purposes of the MOChA Conflict of Interest Policy, "immediate family" shall have the definition assigned in [Minnesota Statutes §124E.02](#) as an individual whose relationship by blood, marriage, adoption, or partnership is no more remote than first cousin.

Implementation

MOChA Board of Directors, staff, and advisors are required to disclose any conflicts of interest. Annually or when seated, employed, or contracted, all individuals are required to sign the Conflict of Interest Policy. Moreover, to ensure all applications and other materials submitted to MOChA for review or consideration are fairly evaluated, reviewers are required to identify any conflicts of interest. If a conflict - perceived or actual, is identified, the conflict and required disclosure will be reported (in the Corporate documents, i.e., board minutes) as well as the board required action.

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.*

Guiding Questions:

- Include the applicant's policy to ensure school autonomy and indicate how it fully aligns with [Minnesota Statutes, Chapter 124E](#)
- 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.
- Describe the process and procedures for implementing and executing the applicant's policy to ensure school autonomy
- Describe how the applicant will hold schools accountable for outcomes rather than processes and operations

Advanced Guiding Question:

- The applicant describes how its policy to ensure school autonomy aligns with nationally recognized quality authorizing principles and standards

MOChA embraces the NACSA *Principles and Standard* school autonomy (Standard 2) by honoring and preserving core autonomies crucial to school success including:

- Governing board independence from MOChA;
- Personnel, though certain licenses or waivers may be required;
- School vision and culture;
- Instructional programming, design, and use of time; and
- Budgeting.

Effectively, MOChA will assume responsibility not for the success or failure of individual schools, but for holding schools accountable for their performance based on performance frameworks that are clear and transparent. Moreover, through seamless and intuitive protocols, MOChA will deliberately minimizes administrative and compliance burdens on schools.

MOChA addresses school autonomy via the Charter Contract and board approved policies and procedures. The MOChA Charter Contract, Article II, addresses the relationship between the school and MOChA, stating in:

Section 2.2. The Independent Status of the School, i.e., MOChA has no authority or control over operational, administrative, or financial responsibility for the School.

Section 2.3. Financial Obligations Are Separate

Section 2.4. No Authority to Obligate or Bind Other Party

Moreover, Article XI, Section 11.1. Contract Renewal, specifies that renewal decisions are merit-based, specifically whether or not the school has fulfilled the Statutory purpose: improve *all* pupil learning and *all* student achievement.

MOChA Principles

The MOChA endorses the following principles aligned to Minnesota Statutes §124E and NACSA *Principles and Standards* (Principle 2):

1. MOChA shall neither manage nor operate charter schools;
2. No member of MOChA nor any individual working on behalf or representing MOChA in any aspect of charter school oversight or decision-making may serve on the board of a MOChA authorized charter school;
3. No member of MOChA nor any individual working on behalf or representing MOChA may be employed by, contractually engage with, or volunteer at an authorized charter school over which that member has oversight or decision-making responsibility;
4. MOChA monitors and evaluates the academic, fiscal, and operational performance of its authorized schools and holds schools accountable for their performance.
5. Technical assistance offered by MOChA should not be construed as required and, if/when offered to the School, the assistance is at no cost to the School.
6. MOChA decisions will be merit-based. MOChA's Performance Framework will guide all decisions regarding ongoing monitoring and oversight and contract renewal. MOChA holds schools accountable for results - academic, operation, and fiscal. And the most important indicator is whether or not the school has fulfilled the Statutory purpose: improve *all* pupil learning and *all* student achievement.

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.*

Guiding Questions:

- Describe the applicant's plan to regularly review its internal ability to oversee its portfolio of charter schools
- Describe the applicant's process to implement continuous improvement plans which will result in more effective authorizing practices

Advanced Guiding Questions:

- Describe the process the applicant will use to evaluate its internal ability (capacity, infrastructure and practices) regularly against its mission, vision and organizational goals
- Describe the applicant's framework(s) for addressing any needs for improvement if falling short of its mission, organizational goals or strategic plan

MOChA routinely engages in self-evaluation and improvement as a means to fulfill its mission to increase *all* student achievement.

Internal Processes

All internal processes and improvements are directed toward accomplishing the Organizational Goals (A.2). These goals frame self-evaluation of capacity, infrastructure and practices. Goals 2-6 are subordinate to and support the effort to improve *all* pupil learning and *all* student achievement:

1. *Primary Purpose*
2. *Replication*
3. *Community*
4. *Teachers*
5. *Minnesota Authorizer Performance Evaluation System (MAPES)*

Self-Evaluation Criteria

Internal Processes

MOChA reviews internal processes at every board meeting. This is especially important as the board launches the new single-purpose authorizer. The Board of Directors, Executive Director, Managing Director, and Advisors project anticipated and necessary work to support the MOChA efforts, assign resources, and review the processes. Efficiencies and strategies for increasing quality shape the exchanges and any proposed changes in workflow, processes, and, potentially, infrastructure.

Board of Director meetings (including staff) include financial reports wherein assets are aligned to (MAPES delineated) categories of work. Budgeted vs actuals are assessed at each meeting to determine alignment of resources to fulfill the MOChA mission. Where realignment is required, the board will make necessary changes to support the work.

Also, the MOChA board will enroll in the NACSA 9-week Virtual Authorizer Bootcamp (cf. A.5). This new platform is designed to share best practices while building capacity through internal and external critique based on best practices in the Principles & Standards (2018). MOChA will benchmark the work against the NACSA Principles & Standards and this will guide plans for continuous improvement in these and other categories (from the Bootcamps):

- Applications
- Autonomy & Accountability
- Problem of Practice
- Ongoing Evaluation
- Charter Renewal Part I
- Ensuring Access for All & Closings

MOChA Leadership Evaluation

The Board of Directors evaluates MOChA staff at least once each year (cf. A.3/4). The evaluation process includes identifying professional development opportunities and growth needs. Resources are assigned in the budget to support growth and professional development (cf. A.5).

MOChA Staffing Adequacy

The Board of Directors evaluates staffing adequacy quarterly. 'Adequacy' includes staffing (including Advisors) expertise and experience (cf. A.4) and maintaining a ratio of staff:schools to insure that MOChA's ongoing oversight obligations are met.

MOChA Procedure Review

Annually, the board and staff will retreat to review MOChA processes to: adopt and/or revise policies, practices and process based on best practices.

Framework for addressing the organization's needs for improvement

The MOChA Board of Directors is committed to not only developing and updating its mission, goals and strategic plan, but also evaluating the effectiveness of these guiding principles and making changes when it determines that improvement is needed. To determine needs and identify areas for improvement, the Board will:

1. Conduct a retreat annually, during which the organization's mission, goals and strategic plan are reviewed to determine the degree to which the organization's actions during the previous year have met the expectations set forth in these guiding statements.
2. Determine organizational strengths: The board will list and reflect on the areas in which the actions of the organization met or exceeded expectations.
3. Examine organizational weaknesses: The board will identify areas in which the actions of the organization did not meet expectations.
4. Anticipate threats and opportunities: The board will identify internal and external threats to the implementation of the mission of the organization, as well as identifying opportunities to enhance the organization's mission and goals.
5. Set goals for improvement: The Board will develop a list of tactics to address any areas of organizational weakness, and direct the Executive Director to develop action plans. The board will evaluate the implementation and effectiveness as a part of its annual review of the Executive Director.
6. Revise current mission, organizational goals and/or strategic plan: The board will make appropriate modifications to the guiding documents of the organization if deemed appropriate.

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.*

Guiding Questions:

- Describe the applicant's process to share best practices and/or provide assistance to other authorizers to promote high-quality authorizing
- 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

MACSA: MOChA will actively participate in the Minnesota Association of Charter School Authorizers (MACSA) monthly meetings and annual retreat.

MDE. All staff will attend all required MDE training for authorizers and, minimally, one board member will attend all required and non-required MDE training for authorizers with the view that high-quality authorizing practices will be shared within the Minnesota authorizing community. A minimum of two

board members and all staff will attend the annual MDE Authorizer with the view that best practices will be shared and disseminated.

NACSA. MOChA will engage with other professionals in order to improve the authorizing practices. Specifically, MOChA will become a National Association of Charter School Authorizers (NACSA) Plus Member. In addition to Authorizer Member benefits, NACSA Plus includes:

1. Additional engagement and learning opportunities;
2. Two complimentary registrations to the NACSA Leadership Conference (budget to support A.5);
3. Access to up to two additional NACSA Communities;
4. A NACSA Benchmark Report comparing MOChA to peers and personalized recommendations to leverage NACSA membership.

ALL board members and staff will enroll in the NACSA 9-week Virtual Authorizer Bootcamp, which is an opportunity to learn and share/disseminate best practices, including the following topics:

- Applications
- Autonomy & Accountability
- Problem of Practice
- Ongoing Evaluation
- Charter Renewal Part I
- Ensuring Access for All & Closings

This NACSA membership will be particularly beneficial as MOChA benchmarks the nascent efforts as a new single-purpose authorizer. Also, a MOChA board member and staff will submit a proposal to present at the Leadership Conference. At this juncture, we envisage presenting on the effort to promote culturally rich, community-based schools - working with community organizations to wrap around services and efforts.

MOChA is committed to learning from and sharing with other authorizers best practices that promote high quality schools. In fact, there are some exceptional charter schools beating the odds and closing the gap. For example, New Century School (authorized by VOA) is currently in the third year of operation serving 325 students, 100% Free/Reduced; 97% EL. The proficiency and growth data is an overwhelming attestation of significant academic gains for students from traditionally underserved populations. The gains in science are remarkable, literally matching the state proficiency rates! To be sure, MOChA values the insights of other authorizers, insights as to how good authorizing can promote excellence for all student and MOChA is committed to share the same once promising and best practices emerge.

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.*

Guiding Question:

- Describe the applicant's internal process which will ensure compliance with reporting, submissions and deadlines set forth in Minnesota Statute

The MOChA board calendar includes critical dates to meet reporting and submission deadlines. Monthly, MOChA leadership will review and report the compliance metrics and all requirements must be met, including:

- MOChA, Federal (including 990)
- MOChA, State
 - Secretary of State
 - Attorney General
 - Minnesota Department of Education
- Authorized Schools

MOChA representatives will attend all required MDE training for authorizers and report to the board and staff regarding any changes to compliance and reporting requirements. Also, annually, the MOChA Board of Directors will review any changes in Statute subsequent to the adjournment of the Legislature.

All compliance responsibilities (e.g., Authorizer Annual Report, Authorizer Annual Income & Expenditure Report, Charter Contract executions, etc.) are monitored, including compliance types, reporting agency, due dates, status of required submission, etc.

The MOChA Charter School Guide includes details (including dates) that inform the practice in reference to reporting, submissions and deadlines set forth in Minnesota Statute.

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.*

Guiding Questions:

- Submit comprehensive new charter school application, instructions, evaluative criteria, procedures, timelines and review process that address the following elements:
 - The school's developers
 - Mission/Vision
 - Need/Demand
 - Primary statutory purpose of improving all pupil learning and all student achievement ([Minnesota Statutes §124E.01, Subd 1](#)) and how the school will report the implementation of it to the applicant
 - Additional purpose(s) and how the school will report the implementation of said purpose(s) to the applicant
 - 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, subd 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 §124E.10, Subd 1\(c\)](#))
 - 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
 - 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 and compliance with applicable laws and regulations, facilities and location
 - Financial plan: short and long-term financial projections, budget(s), business management procedures, financial outcomes and facility planning
 - A "statement of assurances" of legal compliance prescribed by the commissioner
 - 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
- Describe the new charter school application process timeline consistent with statutory deadlines per [Minnesota Statutes §124E.06](#)
- Ensure the new charter school application criteria is consistent with the applicant's performance standards/framework as described in *B.4: Performance Standards* (below)

Advanced Guiding Question:

- 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

The sole purpose of the Minnesota Office of Charter Authorizing (MOChA) is to authorize charter schools in Minnesota through the legal instrumentality of chartering as defined in [Minnesota Statutes §124E](#), *supporting and advancing the purposes of charter school law* by serving as a single-purpose authorizer whose mission is to improve *all* pupil learning and *all* student achievement.

As required in Statute, MOChA - a single-purpose authorizer - does not limit applications it solicits, considers, or approved to any single curriculum, learning program or method. Rather, following [NACSA's Principles and Standards](#), considers diverse educational philosophies, approaches, and school models.

The MOChA board is guided by and committed to fulfill the three Core Principles espoused by NACSA:

1. Maintain high standards for schools
2. Uphold school autonomy
3. Protect student and public interests

Consonant with [NACSA's Principles and Standards](#), MOChA implements a comprehensive application process that include:

- Clear application questions and guidance;
- Follows fair, transparent procedures and rigorous criteria; and
- Grants charters only to applicants who demonstrate strong capacity to establish and operate a quality charter school.

MOChA's applications:

- State the chartering priority to improve *all* pupil learning and *all* student achievement;
- Articulates comprehensive application questions to elicit the information needed for rigorous evaluation of applicants' plans and capacities;
- Require applicants to demonstrate capacity to serve students with diverse needs, such as students with disabilities or learning exceptionalities and English; and
- Provide clear guidance and requirements regarding application content and format, while explaining evaluation criteria.

MOChA's charter application process is open, well publicized - through the charter school network and website, and transparent, organized around clear, realistic timelines. The application timeline allows sufficient time for each stage of the application and school pre-opening process to be carried out with quality and integrity and within the requirements of Statute.

Pursuant to [NACSA's Principles and Standards](#), the applications:

- Describe how each stage of the application process is conducted and evaluated, including MOChA's chartering priorities, processes, approval criteria, and decisions.
- Inform applicants of their rights and responsibilities and promptly notifies applicants of approval or denial, while explaining the factors that determined the decision.

- Utilize a multi-stage process in which applicants are provided information at each stage and are permitted to respond to that information during the process.
- View denied charter applications as an opportunity to provide reasons for denial so that applicants can decide if they wish to revise their plans based in part on that information and resubmit in the future.

Commensurately, MOChA's rigorous approval criteria is aligned to NACSA's Principles and Standards:

- Requires all applicants to present a clear and compelling mission, a quality educational program, a solid business plan, effective governance and management structures and systems, founding team members demonstrating diverse and necessary capabilities, and clear evidence of the applicant's capacity to execute its plan successfully.
- Establishes distinct requirements and criteria for applicants proposing to contract with education service or management providers.

Likewise, decision making is multifaceted and rigorous, aligned to NACSA's Principles and Standards:

- Grants charters only to applicants that have demonstrated competence and capacity to succeed in all aspects of the school, consistent with the stated approval criteria.
- Rigorously evaluates each application through thorough review of the written proposal, a substantive in-person interview with each qualified applicant, and other due diligence to examine the applicant's experience and capacity, conducted by knowledgeable and competent evaluators.
- Engages, for both written application reviews and applicant interviews, highly competent teams of internal and external evaluators with relevant educational, organizational (governance and management), financial, and legal expertise, as well as thorough understanding of the essential principles of charter school autonomy and accountability.
- Provides orientation or training to application evaluators (including interviewers) to ensure consistent evaluation standards and practices, observance of essential protocols, and unbiased treatment of all applicants.
- Ensures that the application-review process and decision making are free of conflicts of interest, and requires full disclosure of any potential or perceived conflicts of interest between reviewers or decision makers and applicants.
- Approves applications that comprise a detailed plan for school opening, operation, and fiscal stability, with little substantive work left for later development.

The New Charter School application process is described in the MOChA *Charter School Guide* and at: theMOChA.org.

The process for applying to MOChA to establish a high-quality charter school is five step:

- Step 1: Letter of Intent, Section B.1.1
- Step 2: Initial Interview
- Step 3: New Charter School Application (by invitation), Section B.1.2
- Step 4: Interview
- Step 5: Decision

The New Charter School Letter of Intent (including instructions) is available upon request (info@theMOChA.org) and at: theMOChA.org and as B.1.1. New Charter School, Letter of Intent

New Charter School Letter of Intent Evaluation Rubric is available at: theMOChA.org and included as B.1.1.1. New Charter School Letter of Intent Evaluation Rubric

New Charter School Application

The New Charter School Application (including instructions and required components) is available upon request (info@theMOChA.org) and at: theMOChA.org and as B.1.2. New Charter School Application

The New Charter School Application Evaluation Rubric is available at: theMOChA.org and included as B.1.2.1. New Charter School Application Evaluation Rubric

Evaluation Criteria

Guidance is embedded in the New Charter School Application (i.e., each required element provides a prompt in the form of: "An exemplary application will"). The New Charter School application criteria is consistent with Performance Framework articulated in Section B.4 (below). The criteria and evaluation are designed to determine whether the proposed plan is needed, cogent, and plausible and whether the founders have the experience, expertise, and capacity to develop a high-quality charter school. Criteria are clear, exacting, and transparent so that the indicators guide the process.

An odd number and minimum of three reviewers will receive inter-rater reliability training prior to reviewing applications. Reviewers are selected based on expertise and experience (see A.4.).

Application Procedures

The application process is described in the MOChA *Charter School Guide* and at: theMOChA.org as well as in the New Charter School Letter of Intent and the New Charter School Application.

Timeline

The timeline is available at: theMOChA.org and MOChA *Charter School Guide*. If MOChA approves the application, the New School Affidavit is submitted to MDE by 1 May, 14 months prior to 1 July of the year in which the school plans to open, in conformance with [Minnesota Statutes §124E.06, Subd. 4](#).

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

Guiding Questions:

- For each interim accountability decision below, 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:
 - Adding grades or sites per [Minnesota Statutes §124E.06, Subd. 5](#)

- Official early learning program(s) recognition per Minnesota Statutes §124E.06, Subd. 3(b) and Minnesota Statutes §121A.16 to 121A.19
- Change in authorizer requests per Minnesota Statutes, section 124E.10, Subdivision 5
- Ready to open per Minnesota Statutes §124E.06, Subd 3(h)

Note: Please provide a response for each accountability decision that reflects its unique requirements.

Advanced Guiding Question:

- 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

Ready to Open

MOChA has established reasonable pre-opening requirements or conditions for new schools to ensure that they meet all health, safety, and other legal requirements prior to opening and are prepared to open smoothly.

Charter School Ready to Open Indicators

Charter School Ready to Open Indicators (including instructions, required components, and dates, aligned to Minnesota Statutes §124E.06, Subd 3(h)) is an integral component of the Charter Contract as Exhibit F and is also available upon request (info@theMOChA.org) and at: theMOChA.org and as B.1.2.3. Charter School Ready to Open Indicators.

As stated in the Charter Contract Section 6.21, high level critical indicators and dates include:

- 1 March: Facility secured
- 1 May: Database of interested students/families that is 125% of budgeted enrollment
- 10 May: Significant renovations/buildout to facility have begun
- 1 June: 75% of projected budgeted students officially enrolled
- 1 June: 75% teaching staff hired
- 1 July: 125% of projected budgeted students officially enrolled

Monthly and prior to opening, the board must provide a report (as part of the board meeting) on the progress in reference to Ready to Open Indicators and note any target dates that were missed.

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Expansion (including Official Early Learning Program(s)), Replication, and Change in Authorizer

The sole purpose of the Minnesota Office of Charter Authorizing (MOChA) is to authorize charter schools in Minnesota through the legal instrumentality of chartering as defined in Minnesota Statutes §124E, *supporting and advancing the purposes of charter school law* by serving as a single-purpose authorizer whose mission is to improve *all* pupil learning and *all* student achievement. As with new and transfer applications, MOChA reviews expansion applications, guided by and committed to fulfill the three Core Principles espoused by NACSA:

1. Maintain high standards for schools
2. Uphold school autonomy
3. Protect student and public interests

Consonant with NACSA's Principles and Standards, MOChA implements a comprehensive application process that include:

- Clear application questions and guidance;
- Follows fair, transparent procedures and rigorous criteria; and
- Grants expansion(s) only to applicants who:
 - Have demonstrated responsible and good governance in reference to operations and finance and, most importantly, have improved *all* pupil learning and *all* student achievement;
 - Demonstrate strong capacity to and commitment to serve additional students.

MOChA's charter expansion application:

- States the chartering priority to improve *all* pupil learning and *all* student achievement;
- Articulates comprehensive application questions to elicit the information needed for rigorous evaluation of applicants' plans and capacities;
- Requires applicants to demonstrate previous success and accomplishments in reference to the Charter Contract, especially and most importantly, improving *all* pupil learning and *all* student achievement.
- Requires applicants to demonstrate capacity to serve students with diverse needs, such as students with disabilities or learning exceptionalities and English; and
- Provides clear guidance and requirements regarding application content and format, while explaining evaluation criteria.

MOChA's expansion application process is open, well publicized - through the charter school network and website, and transparent, organized around clear, realistic timelines. The application timeline allows sufficient time for each stage of the application with quality and integrity and within the requirements of Statute.

Pursuant to NACSA's Principles and Standards, the Application:

- Describes how each stage of the application process is conducted and evaluated, including MOChA's chartering priorities, processes, approval criteria, and decisions.
- Informs applicants of their rights and responsibilities and promptly notifies applicants of approval or denial, while explaining the factors that determined the decision.
- Utilizes a multi-stage process in which applicants are provided information at each stage and are permitted to respond to that information during the process.
- Views denied expansion applications as an opportunity to provide reasons for denial so that applicants can decide if they wish to revise their plans based in part on that information and resubmit in the future.

Commensurately, MOChA's rigorous approval criteria is aligned to NACSA's Principles and Standards:

- Requires all applicants to present clear and compelling reasons how the expansion fulfills the School's mission, a quality educational program, a solid business plan, effective governance and management structures and systems, founding team members demonstrating diverse and necessary capabilities, and clear evidence of the applicant's capacity to execute its plan successfully.
- MOChA reviews and evaluates the Expansion Application in reference to: B.2.2.1. Charter School Expansion Application Evaluation Rubric and B.4.1. - Performance Framework Accountability System (Charter Contract, Exhibit H, accumulated).

Likewise, decision making is multifaceted and rigorous, aligned to NACSA's Principles and Standards:

- Grants expansion only to applicants that have demonstrated competence and capacity to succeed in all aspects of the school, consistent with the stated approval criteria.
- Rigorously evaluates each application through thorough review of the written proposal, a substantive in-person interview and site visit and other due diligence to examine the applicant's experience and capacity, conducted by knowledgeable and competent evaluators.
- Engages, for both written application reviews and applicant interviews, highly competent teams of internal and external evaluators with relevant educational, organizational (governance and management), financial, and legal expertise, as well as thorough understanding of the essential principles of charter school autonomy and accountability.
- Provides orientation or training to application evaluators (including interviewers) to ensure consistent evaluation standards and practices, observance of essential protocols, and unbiased treatment of all applicants.
- Ensures that the application-review process and decision making are free of conflicts of interest, and requires full disclosure of any potential or perceived conflicts of interest between reviewers or decision makers and applicants.
- Approves applications that comprise a detailed plan for expansion, operation, and fiscal stability.

Expansion Application

The Site/Grade Level Expansion Application (including instructions and required components) is available upon request (info@theMOChA.org) and at: theMOChA.org and as B.2.2. Charter School Expansion Application.

The Charter School Expansion Evaluation Rubric is available at: theMOChA.org and included as B.2.2.1. Charter School Expansion Application Evaluation Rubric

Evaluation Criteria

Guidance is embedded in the Charter School Expansion Application (i.e., each required element provides a prompt in the form of: "An exemplary application will"). The Charter School Expansion Application criteria is consistent with Performance Framework articulated in Section B.4 (below). The criteria and evaluation are designed to determine whether the proposed plan is needed, cogent, and plausible and whether the founders have the experience, expertise, and capacity to develop a high-quality charter school. Criteria are clear, exacting, and transparent so that the indicators guide the process.

An odd number and minimum of three reviewers will receive inter-rater reliability training prior to reviewing applications. Reviewers are selected based on expertise and experience (see A.4.).

Application Procedures

The application process is described in the MOChA *Charter School Guide* and at: theMOChA.org as well as in the Charter School Expansion Application.

Timeline

The timeline is located in the MOChA *Charter School Guide* and at: theMOChA.org. The timeline is aligned to ensure that if MOChA approves the application, MOChA will file a Supplemental Affidavit to MDE by 1 October to be eligible to add grades and/or sites in the next school year (Minnesota Statutes §124E.06, Subd. 5.)



Replication Application

The Charter School Replication Application (including instructions and required components) is available upon request (info@theMOChA.org) and at: theMOChA.org and as B.2.3. Charter School Replication Application.

Charter School Replication Applications are evaluated in reference to the Performance Framework and Evaluation Rubrics, available at: theMOChA.org and included as B.4.1. - Performance Framework Accountability System.

Evaluation Criteria

Guidance is embedded in the Charter School Replication Application (i.e., each required element provides a prompt in the form of: "An exemplary application will"). The Charter School Replication Application criteria is consistent with Performance Framework articulated in Section B.4 (below). The criteria and evaluation are designed to determine whether the proposed plan is needed, cogent, and plausible and whether the founders have the experience, expertise, and capacity to develop a high-quality charter school. Criteria are clear, exacting, and transparent so that the indicators guide the process.

An odd number and minimum of three reviewers will receive inter-rater reliability training prior to reviewing applications. Reviewers are selected based on expertise and experience (see A.4.).

Application Procedures

The application process is described in the MOChA *Charter School Guide* and at: theMOChA.org as well as in the Charter School Replication Application.

Timeline

The timeline is available at: theMOChA.org and MOChA *Charter School Guide*. The timeline is aligned to ensure that, if MOChA approves the application, the Affidavit is submitted to MDE by 1 May, fourteen months prior to 1 July of the year in which the school plans to open, in conformance to [Minnesota Statutes §124E.06, Subd. 4](#).



Official Early Learning Program(s) Application

The Official Early Learning Program(s) Application (including instructions and required components) is available upon request (info@theMOChA.org) and at: theMOChA.org and as B.2.4. Charter School Official Early Learning Program(s) Application. For a new school seeking authorization, the Charter School Official Early Learning Program(s) Application should be attached the New Charter School Application (available upon request info@theMOChA.org and at: theMOChA.org).

The Official Early Learning Program(s) Application Evaluation Rubric is available at: theMOChA.org and included as B.2.4.1. Official Early Learning Program(s) Application Evaluation Rubric

Evaluation Criteria

Guidance is embedded in the Official Early Learning Program(s) Application (i.e., each required element provides a prompt in the form of: "An exemplary application will". The Official Early Learning Program(s) application criteria is consistent with Performance Framework articulated in Section B.4 (below). The criteria and evaluation are designed to determine whether the proposed plan is needed, cogent, and plausible and whether the founders have the experience, expertise, and capacity to develop a high-quality charter school. Criteria are clear, exacting, and transparent so that the indicators guide the process.

An odd number and minimum of three reviewers will receive inter-rater reliability training prior to reviewing applications. Reviewers are selected based on expertise and experience (see A.4.).

Application Procedures

The application process is described in the MOChA *Charter School Guide* and at: theMOChA.org as well as in the Official Early Learning Program(s) Application.

Timeline

The timeline is located in the MOChA *Charter School Guide* and at: theMOChA.org. For existing MOChA authorized schools, the timeline is aligned to ensure that if MOChA approves the application, MOChA will file a Supplemental Affidavit to MDE by 1 October to be eligible to add grades and/or sites in the next school year ([Minnesota Statutes §124E.06, Subd. 5](#)). For new schools (adding Official Early Learning Program(s)), If MOChA approves the New Charter School Application and the Official Early Learning Program(s) Application, the New School Affidavit is submitted to MDE by 1 May, 14 months prior to 1 July of the year in which the school plans to open, in conformance with [Minnesota Statutes §124E.06, Subd. 4](#).

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Change in Authorizer

Charter School Change in Authorizer Application (including instructions and required components) is available upon request (info@theMOChA.org) and at: theMOChA.org and as B.2.5. Charter School Change in Authorizer Application.

Charter School Change in Authorizer Applications are evaluated in reference to the Performance Framework and Evaluation Rubrics, available at: theMOChA.org and included as B.4.1. - Performance Framework Accountability System.

Evaluation Criteria

Guidance is embedded in the Change of Authorizer Application (i.e., each required element provides a prompt in the form of: "An exemplary application will". The Change of Authorizer Application criteria is consistent with Performance Framework articulated in Section B.4 (below). The criteria and evaluation are designed to determine whether the proposed plan is needed, cogent, and plausible and whether the founders have the experience, expertise, and capacity to develop a high-quality charter school. Criteria are clear, exacting, and transparent so that the indicators guide the process.

An odd number and minimum of three reviewers will receive inter-rater reliability training prior to reviewing applications. Reviewers are selected based on expertise and experience (see A.4.).

Application Procedures

The application process is described in the MOChA *Charter School Guide* and at: theMOChA.org as well as in the Charter School Change in Authorizer Application.

Timeline

The timeline is located in the MOChA *Charter School Guide* and at: theMOChA.org. The timeline is aligned to ensure that, if MOChA approves the application, MOChA will submit a proposed Charter Contract at least 105 business days before the end of the existing charter contract in conformance to [Minnesota Statutes §124E.10, Subd. 5](#).

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.*

Guiding Questions:

- Submit a charter contract template (See [Charter Contract Guidance](#) on the MDE website) that meets the following elements:
 - All current statutory requirements per [Minnesota Statutes §124E.10, Subd. 1\(a-b\)](#) and [3\(c\)](#)
 - Clearly state the rights and responsibilities of the school and the authorizer
- Describe a plan to establish contract outcomes/goals that are strategic, specific, measurable and time-bound
- 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
- 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
- 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

Advanced Guiding Question:

- 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

MOChA's Charter 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. In accordance with Minnesota statutory requirements (per [Minnesota Statutes §124E.10](#)) and [NACSA's Principles and Standards](#), MOChA executes contracts with charter schools that articulate the rights and responsibilities of each party regarding school autonomy, funding, administration and oversight, outcomes, measures for evaluating success or failure, performance consequences, and other material terms. The contract is an essential document, separate from the charter application, that establishes the legally binding agreement and terms under which the school will operate and be held accountable.

Following [NACSA](#) recommendations and in an effort to promote high quality charter schools, MOChA:

- Executes a contract with a legally incorporated governing board independent of MOChA.
- Grants charter contracts for an initial term up to five operational years plus a preoperational planning period (cf. [Minnesota Statutes §124E.10, Subd. 1](#)).
- Defines material terms of the contract.
- Ensures mutual understanding and acceptance of the terms of the contract by the school's governing board prior to authorization or charter granting by the authorizing board.
- Allows - and requires contract amendments for - occasional material changes to a school's plans, but does not require amending the contract for non-material modifications.
- Executes charter contracts that clearly:
 - State the rights and responsibilities of the school and the authorizer;
 - State and respect the autonomies to which schools are entitled— based on statute, waiver, or authorizer policy—including those relating to the school's authority over educational programming, staffing, budgeting, and scheduling;
 - Define performance standards, criteria, and conditions for renewal, intervention, revocation, and non-renewal, while establishing the consequences for meeting or not meeting standards or conditions;
 - State the statutory, regulatory, and procedural terms and conditions for the school's operation;
 - State reasonable pre-opening requirements or conditions for new schools to ensure that they meet all health, safety, and other legal requirements prior to opening and are prepared to open smoothly;
 - State the responsibility and commitment of the school to adhere to essential public-education obligations, including admitting and serving all eligible students so long as space is available, and not expelling or counseling out students except pursuant to a legal discipline policy approved by the authorizer; and
 - State the responsibilities of the school and the authorizer in the event of school closures.
- Establish the performance standards under which schools will be evaluated, using objective and verifiable measures of student achievement as the primary measure of school quality;
- Define clear, measurable, and attainable academic, financial, and organizational performance standards and targets that the school must meet as a condition of renewal, including but not limited to state and federal measures;
- Include expectations for appropriate access, education, support services, and outcomes for students with disabilities;
- Define the sources of academic data that will form the evidence base for ongoing and renewal evaluation, including state-mandated and other standardized assessments, student academic growth measures, internal assessments, qualitative reviews, and performance comparisons with other public schools in the district and state;
- Define the sources of financial data that will form the evidence base for ongoing and renewal evaluation, grounded in professional standards for sound financial operations and sustainability; and
- Define the sources of organizational data that will form the evidence base for ongoing and renewal evaluation, focusing on fulfillment of legal obligations, fiduciary duties, and sound public stewardship.

MOChA Charter Contract

The MOChA Charter Contract contains all current statutory requirements per [Minnesota Statutes §124E.10, Subd. 1\(a-b\) and 3\(c\)](#). Cf. B.3.1. MOChA Charter Contract Template.

Rights and Responsibilities

School obligations are delineated in the Charter Contract, Article VI (Operating Requirements); Article VII (General Prohibitions); and Article VIII (Compliance with State and Federal Laws).

Charter Contract Section III defines the role and oversight responsibilities of MOChA; Section 2.1 vouchsafes that the School is not a division or part of MOChA and MOChA shall have no authority or control over operational, administrative, or financial responsibility for the School.

Performance Goals

Performance goals are developed during the application process and are integral to the Charter Contract (Section 6.7) and are the basis for contract renewal decisions (Section 11.1). The MOChA Charter Contract explicitly requires that all goals be: specific, measurable, achievable, relevant, and time-bound.

Charter Contract, Execution

1. Charter Contracts, Terms and Conditions, are predicated on and reflect the details in the Charter School Application and, subsequently, the Affidavit;
2. The execution of the MOChA Charter Contract is contingent on approval of the Affidavit by the Commissioner of Education.
3. MOChA follows the NACSA recommendation of a five-year contract unless mitigating factors merit otherwise and at the discretion of MOChA.

Change in Authorizer Contract	Contract Execution Deadline = no later than the first day following the end of the previous contract
	Submission Deadline = within 10 days of execution
New School Charter Contract	Execution Deadline = within 45 days• of affidavit approval
	Submission Deadline = within 10 days of execution
Renewed Charter Contract	Contract Execution Deadline = no later than first day of renewal period
	Submission Deadline = within 10 days of execution
Amended Charter Contract	Submission Deadline = within 10 days of execution
Merged Charter Contract	Effective date: 1 July
	Submission Deadline = within 10 days of execution

•All 'days' are business days unless otherwise noted

4. Charter Contract Signatures and Assurances are secured through a certificate-based digital ID software. The platform meets or exceeds stringent security and legal compliance standards and is certified compliant with ISO 27001, SSAE SOC 2 Type 2, and PCI DSS.

Charter Contract, Amendments

Changes in Statute and/or new requirements by the Minnesota Department of Education may initiate an amendment by MOChA. Mitigating circumstances at the school may warrant an amendment and MOChA considers the requests case by case, as indicated in MOChA *Charter School Guide*. All

amendment must be in writing. The process described above is used in reference to Amended Charter Contracts.

Measure B.4 - Performance Standards: *The applicant has a performance framework under which it executes contracts with clear, measurable and attainable performance standards.*

Guiding Questions:

- Develop a performance framework addressing the following elements:
 - 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 §124E.01, Subd.1, Minnesota Statutes §124E.10, Subd. 1(a)(1) and 1(a)(2).
 - The performance framework defines clear, measurable and attainable academic, operational and financial performance standards for all schools in its portfolio per Minnesota Statutes §124E.10 and consequences for meeting or not meeting performance standards
 - The performance framework 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 §124E.10, Subd. 1(c)
 - Commissioner's outcomes for public school students are the five goals of World's Best Workforce:
 - All children are ready for school
 - All third-graders can read at grade level
 - All racial and economic achievement gaps between students are closed
 - All students are ready for career and college
 - All students graduate from high school

Advanced Guiding Question:

- Identify how the performance framework is designed to promote high-quality charter schools and align with national quality authorizing principles and standards

Performance Standards

Performance standards enable schools and MOChA to know the outcomes for which MOChA will hold schools accountable. They are the basis for school evaluation and should be incorporated in the charter contract, commonly as an attachment. Academic, financial, and organizational performance standards include clearly defined and measurable indicators, measures, metrics, and targets.

The MOChA board developed a Performance Framework (B.4.1. - Performance Framework Accountability System and Charter Contract, Exhibit H) is designed to promote high-quality charter schools and align with national quality authorizing principles and standards, specifically aligned to NACSA's Principles and Standards:

Academic Performance

- Set expectations for student academic achievement status or proficiency, including comparative proficiency;
- Set expectations for student academic growth, including adequacy of growth toward state standards;
- Incorporate state and federal accountability systems, including state grading and/or rating systems;
- Set expectations for postsecondary readiness, including graduation rates; and
- Provide schools an option to incorporate mission-specific performance measures for which the school has presented valid, reliable, and rigorous means of assessment approved by the authorizer.

Financial Performance

- Enable the authorizer to monitor and evaluate the school's financial stability and viability based on short-term performance, and
- Enable the authorizer to monitor and evaluate the school's long-term financial sustainability.

Organizational Performance

- Define the essential elements of the educational program for which the authorizer will hold the school accountable;
- Define financial management and oversight standards based on generally accepted accounting principles;
- Hold school governing boards accountable for meeting statutory and board-established operating and reporting requirements;
- Ensure school compliance with student and employee rights and obligations; and
- Establish expectations related to the school environment, including health and safety, transportation, facilities, and appropriate handling of records.

The MOChA Performance Standards are delineated in the Charter Contract (cf. Document B.3.1. Charter School Contract Template), including Exhibit H: Performance Framework. MOChA incorporates the performance standards within the contract to ensure clarity and transparency of standards and expectations.

The Performance Standards include these aspects required in the Charter Contract delineated in Minnesota Statutes §124E.01, Subd. 3(a)(b): the criteria, processes, and procedures the authorizer will use to monitor and evaluate the fiscal, operational, and academic performance.

- *Academic Performance Standards* are delineated in the Charter Contract, specifically Article VI, Section 6.7. Performance and Assessment. Student *proficiency and growth* are benchmarked according to state assessments, with the goal of fulfilling the primary purpose stated in Minnesota Statute §124E: improve *all* pupil learning and *all* student achievement.
- *Fiscal Performance Standards* are delineated in the Charter Contract, specifically Article VI, Sections 6.9-13, especially Finance, Reporting and Compliance;
- *Operational Performance Standards* are delineated in the Charter Contract, specifically Articles VI, Operating Requirements and VIII, Compliance with State and Federal Laws;

Correspondingly, the Charter Contract includes corollary consequence in reference to a lack of fiscal, operational, and/or academic performance. Specifically, Article X delineates the reasons for a potential Charter Contract revocation/termination or nonrenewal, including failure to fulfill the primary purpose stated in Minnesota Statute §124E: improve *all* pupil learning and *all* student achievement. In addition, high and exacting fiscal and operational performance standards are required and must be met (Sections 10.1 and 10.2).

Similarly, Charter Contract Article XI includes provisions for renewal, requiring that the performance standards are met, including and especially fulfilling the primary purpose stated in Minnesota Statute §124E: improve *all* pupil learning and *all* student achievement (Section 11.1).

Performance Standards are embedded and explicitly stated in the MOChA Charter Contract. Once executed, all Charter Contract decisions - revocation/termination, nonrenewal, and renewal - are merit-based in reference to the Performance Standards.

Measure B.5 - Authorizer's 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.*

Guiding Questions:

- 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 §124E.10, Subd. 1(a)(7)
- Describe the charter schools' required academic, financial and operational reporting to the applicant
- 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
- 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)

Advanced Guiding Question:

- 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

MOChA subscribes to NACSA's Principles and Standards of oversight of the portfolio of charter schools that are designed to promote high-quality charter schools and align with national quality authorizing principles and standards. MOChA conducts contract oversight that competently evaluates performance and monitors compliance; ensures schools' legally entitled autonomy; protects student rights; informs intervention, revocation, and renewal decisions; and provides annual public reports on school performance (via Authorizer Annual Report, submitted to MDE on or before 15 January).

The MOChA oversight criteria, processes, and procedures are delineated in the Charter Contract (Exhibit H, Performance Framework Accountability System (B.4.1.)). The Oversight Responsibilities of MOChA are delineated in Article III, Section Section 3.1., and the Performance Framework and include academic, fiscal, and operational performance. The manner in which MOChA exercises oversight is set forth generally in Article VI: the school agrees that MOChA may monitor and evaluate any indicator of academic, financial, and operational performance, as well as performance indicators not specifically identified in the contract. This provides a comprehensive review of school performance.

Criteria

1. Academic performance oversight is conducted through collection of school and public data and data analysis, site visits and a review of annual reports. Annually, state proficiency and growth data is evaluated in special reference to the Charter Contract Goals. Academic performance is the most important criteria in the effort to improve *all* pupil learning and *all* student achievement.
2. Financial oversight is conducted through the review of financial reports, review of external audits, interviews with the school leadership, board and school business manager. Schools are required to furnish MOChA with financial data and reports monthly (integral to the board meeting information).
3. Operational oversight is conducted through review of school reports and disclosures, compliance monitoring, MOChA's attendance and observations at board meetings (at least three per year), and site-visits (at least annually).

School Reporting to MOChA. The Charter Contract delineates the reporting obligations including:

- State assessment results (preliminary and final), Section 6.7
- Continuous Improvement Plan, annually reviewed, Section 6.7
- School Calendar, Section 6.8
- Financial reports, including monthly reports and annual budgets, Section 6.9
- Annual Independent External Audit, Section 6.11
- Annual Report, Section 6.14
- Board Meetings and minutes, Sections 6.2 and 6.20
- Changes in Board Membership (and verification of background checks), Section 6.20
- Annual Assurances, including Conflict of Interest, Section 6.20
- Lease, including amendments, Section 11.3

Evaluation, Compliance, School Autonomy and Student Rights

The Charter Contract governs performance (academic, fiscal, and operational) evaluation and the oversight and monitoring for compliance. Also, the autonomy of the School is vouchsafed in the Charter Contract (cf. A.7 and A.8 above) and the demarcated and ongoing oversight establishes clear expectations, School and MOChA; MOChA's roles and responsibilities are clearly defined and independent of the operation of the School, avoiding any actual or perceived conflict of interest (cf. A. 7 above). In turn and as a result of the demarcations set and articulated above, School autonomy and the rights of students (as defined in the Charter Contract, Articles VII and VIII, Section 8.1) are promoted and protected.

Ongoing Oversight

MOChA visits each school as appropriate and necessary for collecting data that cannot be obtained otherwise and in accordance with the Charter Contract, while ensuring that the frequency, purposes, and methods of such visits respect school autonomy and avoid operational interference. All visits will be planned, scheduled and anticipated unless mitigating circumstances necessitate otherwise.

MOChA evaluates each school annually (based on the Performance Framework Accountability System (Charter Contract, Exhibit H) on its performance and progress toward meeting the standards and targets stated in the Charter Contract, including essential compliance requirements, and clearly communicates the written evaluation results to the school's governing board and leadership. MOChA will report results to the School within 30 days of the receipt of the audit (final not draft).

Intervention, Termination and Renewal Decisions

Ongoing oversight and actions - whether interventions, termination, renewal - are inextricably related. Clear and consistent oversight processes yield information and MOChA evaluates that information - academic, fiscal, and operations. This evaluation informs decision making, including interventions, corrective actions, termination, or renewal. Factual, timely, empirical information is often critical early in the process so that exigencies can be avoided, e.g., early indicators might yield concerns that prompt interventions, corrective actions, etc., rather than a more draconian measure. Similarly, data might indicate significant performance gains, pointing to a value added component that might be replicable and certainly strengthen the case for renewal.

Measure B.6 - Authorizer's 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.*

Guiding Questions:

- Describe the standards, procedures and processes to address and resolve complaints, including forms if applicable
- Describe the standards, procedures and processes for intervention and corrective action
- 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)

Advanced Guiding Question:

- 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

Complaints

The process and procedure for submitting/reporting a complaint is contained in the MOChA *Charter School Guide* and available at: theMOChA.org. Complaints under the legal purview of MOChA must be submitted in writing, identify the complainant (though some to all data, including identities may be classified as private), and identify specific details. MOChA will conduct a reasonable inquiry and attempt to respond to the complainant within 30 days of receipt.

Interventions and Remediations

MOChA subscribes to NACSA's Principles and Standards by Establishing and making known to schools the general conditions that may trigger intervention and the types of actions and consequences that may ensue while giving schools clear, adequate, evidence-based, and timely notice of contract violations or performance deficiencies.

Moreover, MOChA allows schools reasonable time and opportunity for remediation in non-emergency Situations. Where intervention is needed, MOChA engages in intervention strategies that clearly

preserve school autonomy and responsibility (identifying what the school must remedy without prescribing solutions).

MOChA applies professional discretion when intervention is needed and considers context and a range of effective solutions, rather than relying solely on tools or protocols to make decisions.

The MOChA Charter Contract Section 6.7(b) delineates the remediation process:

- MOChA will issue a notice to School Leader(s) or Board Chair (cf. B.6.1. Notice of Concern/Corrective Action. This template - B.6.1. - serves as the archetype for this and other notices referenced below); If unresolved satisfactorily:
 - MOChA will issue a formal Notice to School Board if the proposed remediation is unacceptable and/or the issue(s) unresolved;
- MOChA may initiate Revocation/Termination notice pursuant to the requirements set forth in Section 10.3 (Procedures for Revoking/Terminating or Not Renewing Contract) whereby charter authorization could be withdrawn.

Range of Interventions Guidelines

MOChA evaluates all of the information it obtains through its ongoing oversight to inform decision-making. School's performance and/or actions may trigger an intervention. The chart below describes what triggers different levels of intervention as well as the ensuing result. Official interventions require a response from the school's Board of Directors. An intervention level is determined by the severity of the concern and need not begin with level one or advance level-by-level.

Status	Triggered by...	Results in....
<i>Level 1</i> Notice of Concern	<ul style="list-style-type: none">• Signs of weak performance identified through routine monitoring; through implementation, compliance, or performance reviews; or by other means.• Repeated failure to submit required documents on a timely basis.	<ul style="list-style-type: none">• Letter to the school's board detailing areas of concern.• Review and reconsideration of goals and performance targets in the Accountability Plan.• MOChA recommendation that the school develops a School Improvement Plan (SIP).
<i>Level 2</i> Notice of Deficiency	<ul style="list-style-type: none">• Failure to meet multiple performance targets; or glaring or repeated failure to meet a single performance target.• Failure to comply with applicable law or significant failure to comply with Board condition(s) of the charter.	<ul style="list-style-type: none">• Letter to the school's board detailing areas of deficiency.• SIP containing specific improvement objectives, technical assistance requirements, and schedule for remedial action negotiated with MOChA.

<i>Level 3</i> Notice of Probationary Status	<ul style="list-style-type: none"> Continued failure to meet performance targets; and failure to meet objectives of SIP. Continued Failure to comply with applicable law or with the charter. 	<ul style="list-style-type: none"> SIP required by MOChA. MOChA will assign an advisor to monitor the implementation of the SIP.
<i>Level 4</i> Charter Extended Review	<ul style="list-style-type: none"> Pattern of failure to comply or meet performance targets; or failure to successfully address terms of probation. 	<ul style="list-style-type: none"> Recommendation to revoke, not to revoke, or to impose lesser sanctions. Decision to commence or not to commence revocation proceedings.
<i>Level 5</i> Charter Revocation	<ul style="list-style-type: none"> Charter review results in recommendation to revoke. 	<ul style="list-style-type: none"> Written notice from MOChA stating reasons for proposed revocation and informing school of right to an informal hearing. Record of informal hearing. Decision to revoke or not to revoke made by MOChA.

Alignment with Ongoing Oversight and Accountability

Clear and consistent oversight, monitoring, and interventions are inextricably related to interventions and remediations. The degree of intervention is correlated with the significance of the concern or complaint. A complaint by the Attorney General for example, would warrant an immediate site visit and/or meeting with the Board Chair and/or School leader. Continuity of oversight and monitoring (e.g., monthly board meetings), on the other hand, affords a broader context including possible trends that might require intervention (e.g., insufficient student growth from fall to winter). If a Notice of Corrective Action is issued, the School is required to respond to the notice within 10 days.

Conversely, the preponderance and frequency of interventions and remediations - school and portfolio - level of and frequency - will inform oversight and monitoring protocols, practices, and processes. That is, significant numbers or trends in frequency an/or types, would prompt a self-evaluation of capacity, infrastructure, and practices (see A.9) in special reference to oversight and monitoring (B.5).

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.*

Guiding Question:

- Describe the plan to provide proactive support, development and technical assistance to charter schools

- Describe how the support, development and technical assistance will be provided in a variety of areas and in a manner to preserve school autonomy

Annually, MOChA provides the following technical assistance and related support:

1. *School Reporting to MOChA.* A primary mechanism for reporting will be designated by MOChA for submitting all required data regarding school performance measures as outlined in the contract with each school. MOChA will provide technical training in the use of the reporting mechanism. Minimally, the School must identify one staff member and one board member to attend annual training and assume the compliance reporting. Many of the compliance requirements for MOChA also fulfill MDE reporting requirements.

The training and support are *proactive* and MOChA furnishes new schools (pre-operational and first year) with monthly reports regarding accuracy rates (percentage and #/# on-time submissions) for reporting and the number of any past due submissions, including required board documents. This will be included in the MOChA report for the monthly School's board meetings and will also be reported back to the MOChA board.

The MOChA reporting system will be designed to assist the School in developing a board and school calendar for reporting/compliance requirements, e.g., monthly board meeting agendas, minutes, materials (including financial reports), policies, etc. In this sense, MOChA's reporting mechanism functions as a guide as well as a secure repository. MOChA's reporting system will facilitate school compliance in the following areas:

- Board Governance. The MOChA reporting system will facilitate planning and preparation of board materials related to meeting management. It will also serve as a mechanism for enhancing the board-School Leader relationship by simplifying necessary tasks to prepare for board meetings. The enhanced coordination and communication creates more time for the board to align around what truly matters.
- Compliance. MOChA's reporting and data-management system will facilitate compliance with relevant agencies, including the authorizer, MDE and other agencies.
- Performance. The MOChA data management system will compile data from submissions to provide key measures of a school's academic and financial performance.
- Document Management. The MOChA data management system streamlines document management by providing a structured framework to easily collect, organize, and track documents.

2. MOChA will post and promote MDE training opportunities including Food and Nutrition, boot camps, etc.
3. Through quarterly surveys and interactions with schools (e.g., board meetings), MOChA will identify common and/or high level needs (preventative and/or corrective) and offer (at no cost) technical assistance to both prevent problems and promote continuous improvement.
4. MOChA will post information at www.themocha.org regarding opportunities that might benefit schools, e.g., conferences, meetings, workshops, grant opportunities, etc.
5. MOChA will host periodic meetings as opportunities and/or needs arise. For example, recently, funds became available through application for school safety. Other examples include MDE announcements of the Federal CSP Grant Application (New School and Replication). MOChA will invite schools who secured CSP funds recently to share their experience and

recommendations. MOChA will also furnish the Authorizer narrative. And annually, MOChA will host a symposium for legislative updates. Attendance is not required and is offered to MOChA authorized schools at no cost.

School Autonomy

Technical assistance is not required and, if/when offered to the School, the assistance is at no cost to the School.

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.

Guiding Question:

- 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

Model Replication

MOChA espouses the replication of successful learning models. Two conduits promote replication:

1. The New Charter School Application (available upon request (info@theMOChA.org) and at: theMOChA.org) includes provision for replication in III.A.: The School provides compelling research and data that indicate the learning program is effective for *all* students. The replication of an extant model must identify the school(s) involved and the compelling achievement data that would indicate that the model would be successful (including the projected student demographic and prosopographic profiles) for *all* students.
2. Charter School Replication Application. The Replication Application is reviewed based on statutory requirements and the terms and conditions set forth in the commissioner-approved MOChA Authorizer Approved Plan. The Application must demonstrate exemplary academic, financial, and operational performance in the current school(s). Applicants that do not demonstrate the required high and exacting levels will be redirected to (optionally) submit a New Charter School Application.

The Replication Application is available upon request (info@theMOChA.org) and at: theMOChA.org

Dissemination of Best Practices

MOChA is committed to the dissemination of best practices. Dissemination includes two aspects:

1. theMOChA.org includes links to a repository of assets and resources that feature exemplary teaching/learning practices as well as opportunities for professional development.
2. As the portfolio of MOChA authorized schools grows, MOChA will host network exchanges for board members, school leaders, and teachers. The quarterly meetings will focus on topics identified by schools and MOChA. Best practices (including resources and tools) will be shared among the schools.

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.*

Guiding Questions:

- 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 §124E.10, Subd. 1(a)(7), 1(a)(8), 1(a)(13), 1(a)(14), 1(c) and 3(a) and include the following:
 - 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 §124E.10 Subd. 1(a)(7)
 - The formal written performance evaluation that is a prerequisite for reviewing a charter contract under subdivision 3 per Minnesota Statutes §124E.10, Subd. 1(a)(8)
 - The specific conditions for contract renewal that identify the performance of all students under the primary purpose of Minnesota Statutes §124E.01, subd. 1, as the most important factor in determining whether to renew the contract per Minnesota Statutes §124E.10, Subd. 1(a)(13)
 - The additional purposes under Minnesota Statutes §124E.01, subd. 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 §124E.10, Subd. 1(a)(14)
 - Standards and process to evaluate the school's performance 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 §124E.10, Subd. 1(c)
 - Standards for determining consequences for meeting or not meeting performance standards
 - The authorizer shall provide a formal written evaluation of the school's performance before the authorizer renews the charter contract per Minnesota Statutes §124E.10, Subd. 3(a)
- 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 §124E.10, Subd. 1(b), Subd. 4 and Subd. 6

Advanced Guiding Question:

- 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

The sole purpose of the Minnesota Office of Charter Authorizing (MOChA) is to authorize charter schools in Minnesota through the legal instrumentality of chartering as defined in Minnesota Statutes §124E, *supporting and advancing the purposes of charter school law* by serving as a single-purpose authorizer whose mission is to improve *all* pupil learning and *all* student achievement.

The MOChA Charter Contract Article XI includes provisions for renewal, requiring that the performance standards are met, including and especially fulfilling the primary purpose stated in Minnesota Statute §124E: improve *all* pupil learning and *all* student achievement (Section 11.1). If the Charter Contract goals have been met or exceeded and all other obligations have been satisfied, MOChA requires the School to propose new (up to five year) SMART goals. Once agreed upon, the goals are codified in the Charter Contract (Section 6.7).

Correspondingly, the MOChA Charter Contract includes corollary consequence in reference to a lack of academic, fiscal, and/or operational performance. Specifically, Article X delineates the reasons for a potential Charter Contract revocation/termination or non-renewal, especially and primarily for failure to fulfill the primary purpose stated in Minnesota Statute §124E: improve *all* pupil learning and *all* student achievement. In addition, high and exacting fiscal and operational performance standards are required and must be met (Sections 10.1 and 10.2).

Performance Standards are embedded and explicitly stated in the MOChA Charter Contract. Once executed, all Charter Contract decisions - revocation/termination, non-renewal, and renewal - are merit-based in reference to the Performance Framework (Exhibit H).

Standards and Consequences for Meeting/Not Meeting Performance Standards

The MOChA Charter Contract specifically states that improving *all* pupil learning and *all* student achievement is the most important factor in determining contract renewal, and that the determination will be based primarily on the School's attainment of academic outcomes in the contract; however, the contract also allows MOChA to consider other compelling evidence of student achievement on state assessments. The contract also allows termination for serious financial or legal problems. The charter contract also sets forth the circumstances for a corrective action renewal - the School is improving *all* pupil learning and *all* student achievement but the School has financial and/or operational issues – and that the circumstances resulting in the corrective action renewal, must be addressed and corrected during the corrective action renewal term or no subsequent renewal will be provided (see Section 10.3).

MOChA has designed and will implement a transparent and rigorous process that uses comprehensive academic, financial, and operational performance data to make merit-based renewal decisions, and revoke charters when necessary to protect student and public interests (cf. B.4.1. Performance Framework Accountability System)

Revocation

MOChA revokes a charter during the charter term if there is clear evidence of extreme underperformance or violation of law or the public trust that imperils students or public funds.

Non-renewal

Non-renewal is MOChA's decision not to renew a charter at the end of its term. Non-renewal decision are merit-based and the school's inability to make adequate progress toward meeting the standards and targets stated in the Charter Contract, especially the contractual obligation to improve *all* pupil learning and *all* student achievement

Renewal

Renewal decisions are merit-based and inclusive of evidence. MOChA bases the renewal process and renewal decisions on thorough analyses of a comprehensive body of objective evidence defined by the Performance Framework in the charter contract (Exhibit H). MOChA grants renewal only to schools that have achieved the standards and targets stated in the charter contract, are organizationally and fiscally viable, and have been faithful to the terms of the charter contract and applicable law.

Conversely, MOChA does not make renewal decisions, including granting probationary or short-term renewals, on the basis of political or community pressure or solely on promises of future improvement.

Renewal is based on the school's performance, with the application serving as a data source. School performance sources and indicators include:

- Regular school visits (including board meetings)
- Communication between MOChA and the School
- School Annual Reports (including independent external audits)

Material Evidence

MOChA provides to each school, in advance of the renewal decision, a cumulative performance report that includes:

1. *Written Performance Evaluation.* MOChA will prepare a summation of the performance and progress toward meeting the standards and targets stated in the Charter Contract. The evaluation rubrics are integral to the Performance Framework Accountability System (B.4.1. And Charter Contract, Exhibit H). MOChA will clearly communicate evaluation results to the school's governing board and leadership. This Summative Report will serve as the basis for the school's prospects for renewal or nonrenewal.
2. *Application.* MOChA requires any school seeking renewal to apply for it through a renewal application, which provides the school a meaningful opportunity and reasonable time to respond to the cumulative report; to correct the record, if needed; and to present additional evidence regarding its performance.
3. *Student Learning and Achievement.* The school will be eligible for renewal only if the school has improved *all* pupil learning and *all* student achievement, notwithstanding exceptional achievement in other identified purposes, financial, operational, and/or legal compliance requirements.

Charter School Renewal Application

Charter School Renewal Application (including instructions and required components) is available upon request (info@theMOChA.org) and at: theMOChA.org and as B.9.1. Charter School Renewal Application.

Charter School Renewal Applications are evaluated in reference to the Performance Framework and Evaluation Rubrics, available at: theMOChA.org and included as B.4.1. - Performance Framework Accountability System.

Evaluation Criteria

Guidance is embedded in the Charter School Renewal Application (i.e., each required element provides a prompt in the form of: "An exemplary application will"). The Charter School Renewal application criteria is consistent with Performance Framework articulated in Section B.4 (below). The criteria and evaluation are designed to determine whether the proposed plan is needed, cogent, and plausible and

whether the founders have the experience, expertise, and capacity to develop a high-quality charter school. Criteria are clear, exacting, and transparent so that the indicators guide the process. The evaluation results will determine the length of the charter contract. MOChA follows the NACSA recommendation of a five-year contract unless mitigating factors merit otherwise and at the discretion of MOChA.

An odd number and minimum of three reviewers will receive inter-rater reliability training prior to reviewing applications. Reviewers are selected based on expertise and experience (see A.4.).

Application Procedures

The application process is described in the MOChA *Charter School Guide* and at: theMOChA.org as well as in the Charter School Renewal Application.

Timeline

The timeline is located in the MOChA *Charter School Guide* and at: theMOChA.org. The timeline is aligned to ensure that, if MOChA approves the application, MOChA will submit an executed charter contract to MDE before the end of the existing charter contract.

Charter School Renewal/Non-renewal and Termination Decision Standards and Processes

The renewal/non-renewal/termination process is delineated in Sections X (Contract Revocation/Termination and Nonrenewal) and XI (Contract Renewal) of the Charter Contract and summarized in the *MOChA Charter School Guide*.

Length of Contract Renewal Guidelines

The following guidelines represent targets ~~by charter school~~ in the renewal process. MOChA will assess all relevant data to inform the decision. In addition MOChA, will exercise judgement in determining the length of contract renewal.

Renewal Years	Indicators of School Performance
5 Year Renewal	<ul style="list-style-type: none">• No intervention for the previous three, consecutive years.• Overall Annual Review (most recent) rating: 3.0 or above - all sections require a rating of 3.0 or above.• Meets all the terms of the MOChA Charter Contract• No major concerns with academic, financial, and/or operations• Indicators of excellence are present (i.e., MDE School Finance Award, Local/State/National Recognition of school, staff, students, etc.)
4 Year Renewal	<ul style="list-style-type: none">• Not currently on intervention; No interventions in previous two years.• Overall Annual Review (most recent) rating: 2.75 or above - Academic MUST be 3.0 and no section below 2.0• Meets all the terms of the MOChA Charter Contract• No major concerns with academic, financial, and/or operations
3 Year Renewal	<ul style="list-style-type: none">• Not currently on intervention; No more than one year on Intervention status in the past three years.• Overall Annual Review (most recent) rating: 2.5 or above - Academic MUST be 3.0 and no section below 2.0• Meets the terms of the MOChA Charter Contract, with minor exceptions• Minor concerns with academic, financial or operations

2 Year Renewal	<ul style="list-style-type: none"> • Currently on Intervention - first occurrence during contract • Overall Annual Review (most recent) rating: 2.25 or above - Academic MUST be 2.5 and no section below 1.75 • Meets the terms of the contract, with minor exceptions • Concerns with academic, financial or operations • Minor outstanding requests or requirements
1 Year Renewal	<ul style="list-style-type: none"> • Currently on Intervention - multiple occurrences during contract • Overall Annual Review (most recent) rating: 2.0 or above - Academic MUST be 2.0 and no section below 1.5 • Meets the terms of the MOChA Charter Contract, with one or more major exceptions • Major concerns with academic, financial and/or operations • Minor outstanding requests or requirements
Non-Renewal	<ul style="list-style-type: none"> • Currently on Intervention - multiple occurrences during contract • Overall Annual Review (most recent) rating: below 2.0. • Does not meet two or more terms of the MOChA Charter Contract • Major concerns with academic, financial and/or operations • Major outstanding requests or requirements • Violations of law

Closure Plan

The school closure plan (including required elements) is included as Exhibit G (Charter Contract), Closure Checklist & Plan. MDE's Charter School Closure Guide is provided upon notification of closure.

5-year budget to follow

End of document

Performance Measures A: Authorizer Capacity and Infrastructure						
A.6.1: Authorizer Operational Budget						
<i>Projected Five-Year Budget</i>						
		Year 1	Year 2	Year 3	Year 4	Year 5
Number of Authorized Schools		6	12	18	24	30
Staff/Contractors FTEs		0.8	1.5	2.5	3.0	4.0
Ratio, FTE:Schools		8.0	8.0	7.2	8.0	7.5
Revenue						
Authorizer Fees (Minnesota Statute §124E)		\$71,162.00	\$151,606.00	\$250,614.00	\$371,280.00	\$491,946.00
Expenses						
Staff & Contractors		\$41,800.00	\$83,600.00	\$146,300.00	\$219,450.00	\$329,175.00
Mileage		\$2,200.00	\$4,400.00	\$6,600.00	\$8,800.00	\$11,000.00
Supplies		\$2,100.00	\$6,300.00	\$10,500.00	\$12,600.00	\$14,700.00
Capital (Tech/FFE)		\$2,870.00	\$8,610.00	\$11,480.00	\$11,480.00	\$14,350.00
Legal		\$5,500.00	\$11,000.00	\$13,750.00	\$27,500.00	\$22,000.00
Dues/Memberships		\$5,400.00	\$16,200.00	\$21,600.00	\$27,000.00	\$32,400.00
Insurances		\$2,500.00	\$2,575.00	\$2,652.25	\$2,731.82	\$2,813.77
Professional Development		\$2,000.00	\$5,000.00	\$10,000.00	\$15,000.00	\$17,000.00
Food (hosting MOChA day meetings and while attending conferences and workshops)		\$960.00	\$1,800.00	\$2,520.00	\$3,240.00	\$3,960.00
Postage		\$50.00	\$51.50	\$53.05	\$54.64	\$56.28
Facility (including utilities)		\$4,000.00	\$8,000.00	\$12,000.00	\$15,000.00	\$18,000.00
Total Expense		\$69,380.00	\$147,536.50	\$237,455.30	\$342,856.46	\$465,455.05
Profit/(loss)		\$1,782.00	\$4,069.50	\$13,158.70	\$28,423.54	\$26,490.95
Net Assets		\$4,598.00	\$8,667.50	\$21,826.20	\$50,249.74	\$76,740.69
NA %		2.50%	5.87%	9.19%	14.66%	16.49%