

## Charter Sponsor Evaluation

**Sponsor:** Missouri Charter Public School Commission

**Report Date:** June 29, 2021

**Evaluation Period:** July 1, 2017 - June 30, 2020

### Background

The Missouri Charter Public School Commission (MCPSC) is one of nine authorized sponsors of charter sponsors in Missouri. The MCPSC has twelve schools in its portfolio:

- Academy of Integrated Arts
- Atlas Public School (Opening 2021-2022)
- Brookside Charter School
- Citizens of the World – Kansas City
- DeLaSalle Charter School
- Ewing Marion Kauffman School
- Gateway Science Academy
- Hogan Preparatory Academy
- Kairos Academies
- Kansas City Girls Preparatory Academy
- The Leadership School (Opening 2022-2023)
- University Academy

### Evaluation Process

The Missouri Department of Elementary and Secondary Education (DESE) sponsor evaluation process is a five-step process. Following the evaluation period, the initial review, or step 1 in the evaluation process is for the sponsor being evaluated to submit documentation that provides evidence of its performance against the six sponsorship standards found in 5 CSR 20-100.260, Charter Sponsorship Standards. Step 2 in the process is a preliminary evaluation. Once the submission of documents is complete, a team of DESE staff evaluates the evidence against the standards. Step 3 is a preliminary evaluation feedback conference with the sponsor. The conference notes strengths and weakness in the evidence. Step 4 is implemented if the sponsor wishes to submit additional documentation to address any weaknesses. Step 5 is the production of the final evaluation, based on the entire body of evidence, as well as a review of the historical record of the sponsor's decision-making. DESE shares the final evaluation with the sponsor, the Commissioner of Education and the State Board of Education (State Board).

The evaluation of the MCPSC's charter sponsorship program followed the standard process outlined above and covered the period of July 1, 2017, through June 30, 2020. During the evaluation, MCPSC

submitted a number of documents and assurances to DESE. Upon review, DESE produced a preliminary report shared with the MCPSC’s charter office team on April 7, 2021. The report noted a need for greater evidence in five of the six standards. The report also noted that the submission was well organized, providing the review team with a review process that was made more efficient by reducing the need to search for supporting evidence.

The MCPSC submitted additional documentation through April 21, 2021. DESE staff again reviewed the entire body of documentation as well as the sponsor’s record of decision-making during the evaluation period, or any time for cause. DESE has produced its final report based on a review of all of the documentation submitted and school performance data.

**Standards and Indicators**

The tables below show the six standards by which DESE evaluates charter sponsors. Each table also gives the short title of the indicators associated with each standard. Each table is followed by a brief summary of the standard and indicators’ focus and the evidence examined.

<b>Standard 1: Sponsor Commitment and Capacity</b>	
1A.	Staff committed to law and sponsorship
1B.	Sponsor eligibility
1C.	Staff/Contractor expertise
1D.	Sponsor professional development
1E.	Staff background checks
1F.	Conflict of interest policy
1G.	Continuous self-improvement processes
1H.	Joint Committee report
1I.	Sponsor fee spending report

**Standard 1** examines the sponsoring institution’s commitment and capacity to support charter schools. This includes both staff expertise and access to additional specialized knowledge through contracts, consultants, or other organizational relationships. The sponsoring institution must provide professional development, attend to background checks and conflict of interest, and submit required reports. The documentation includes staff resumes, institutional assurances, policies, and reports.

<b>Standard 2: Application Process and Decision-Making</b>	
2A.	Application process
2B.	Application document content
2C.	Differentiated application for current operators
2D.	Differentiated current operator background

2E.	Differentiated application for Education Service Providers / Charter Management Organizations
2F.	Application evaluator qualifications
2G.	Application evaluator training
2H.	Applicant interview
2I.	Applicant advisement about LEA status
2J.	Application approval criteria (competence and capacity)
2K.	Prompt application decision communications
2L.	Applications submissions to DESE by deadline

**Standard 2** examines the sponsoring institution’s process for accepting and evaluating applications for new charter schools. The sponsor must have a documented process for application submission, an application with the required component, and a differentiated process for Education Service Providers and Charter Management Organizations. The sponsor must use qualified evaluators for the applications and include training of the evaluators. The application process must include documentation for how the sponsor makes decisions. Finally, DESE evaluates the sponsor’s communications throughout the application process. Evidence for Standard 2 includes promotional and informational publications by the sponsor, the application document, evaluators’ resumes and training logs, interview and evaluation protocols, and actual or sample correspondence.

<b>Standard 3: Charter Contract</b>	
3A.	Execute valid contract
3B.	Performance expectations
3C.	Primacy of charter contract over CMO contract
3D.	Sponsorship not conditioned on fee-based services

**Standard 3** evaluates the sponsor’s contract(s) for its charter schools. The evaluation includes a number of required components. Indicator 3B examines the performance expectations contained in the contract. These expectations hold a minimum standard for the performance goals that will cause the charter school to perform in the accredited range.

<b>Standard 4: Ongoing Oversight and Evaluation</b>	
4A.	Comprehensive performance/compliance monitoring system
4B.	Communicate monitoring system to schools

4C.	Onsite monitoring
4D.	School performance feedback
4E.	APR on sponsor website
4F.	Charter autonomy protected from sponsor
4G.	Federal compliance monitoring
4H.	State compliance monitoring
4I.	Nondiscriminatory admissions verification
4J.	Admissions lottery monitoring
4K.	Governance monitoring
4L.	Charter board member training

**Standard 4** addresses the sponsor’s duty to monitor its charter schools as they operate. The indicators require an examination of the monitoring system design and the sponsor’s implementation of the system. Under this standard, DESE examines: sponsor communications to the school about how and when monitoring will occur and feedback on monitoring system outcomes; and sponsor communication to the public about charter performance; areas of monitoring include state and federal compliance, admissions practices, governance practices, and charter board training. Documentation includes the monitoring system document and protocols, samples of monitoring reports and feedback, and samples of communications to schools about monitoring. DESE reviews the sponsor’s website for required public communication. Sponsors must provide evidence of monitoring governance and board member training.

<b>Standard 5: Fiscal Oversight</b>	
5A.	Annual financial audits
5B.	Annual Secretary of the Board Report (ASBR) procedural compliance
5C.	Financial controls
5D.	Financial performance against contract
5E.	Financial stress notification to DESE
5F.	Cooperate with DESE in fiscal management
5G.	ASBR submission

**Standard 5** provides a basis for the sponsor’s monitoring of its schools’ fiscal operations. This includes the sponsor’s review of the schools’ audits, ASBR submissions, internal controls, and accounting procedures. Additionally, DESE reviews the schools’ financial performance against its performance contract requirements. Evidence for Standard 5 includes documentation of the sponsor’s review of the

schools’ audits and ASBR, publication of the audit on the sponsor’s website, and communication to DESE if a school was financially stressed.

<b>Standard 6: Renewal, Replication, Expansion, Revocation, and Closure Decision-Making</b>	
6A.	Evidence-based renewal decisions
6B.	Cumulative performance report prior to renewal
6C.	Renewal criteria (contract fulfillment, org. viability, fiscal viability)
6D.	Expedited renewal process
6E.	Prompt renewal decision communicated
6F.	Expedited replication and expansion for high quality
6G.	Replication and expansion decision-making
6H.	Revocation
6I.	60 Day revocation notice
6J.	Closure process

**Standard 6** addresses the sponsor’s decision-making process in the areas of renewal, replication, expansion, charter revocation, and closure. The sponsor must review the schools’ performance prior to renewal decision-making. Further, the review must provide evidence on which the sponsor based its decisions. Sponsors must also demonstrate their process for making decisions around replication, expansion, revocation, and closure are evidence based. DESE will review communication by the sponsor related to these decisions. Documentation for decision-making includes sponsor review process documents, performance contracts, actual decisions, and samples of communications.

**Findings**

Based on a thorough review of the entire body of documentation, websites, the sponsor’s decision making, and other objective evidence, DESE has determined that for the period of July 1, 2017, through June 30, 2020, the MCPSC’s status with regard to the six standards of sponsorship are as follows.

<b>Standard 1: Sponsor Commitment and Capacity</b>	Meets Standard
<b>Standard 2: Application Process and Decision-Making</b>	Meets Standard
<b>Standard 3: Charter Contract</b>	Meets Standard
<b>Standard 4: Ongoing Oversight and Evaluation</b>	Meets Standard
<b>Standard 5: Fiscal Oversight</b>	Meets Standard

<b>Standard 6: Renewal, Replication, Expansion, Revocation, and Closure Decision-Making</b>	Meets Standard
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**Recommendation**

In the preliminary feedback discussion, DESE staff noted the lack of written documentation that evidences communication between the MCPSC and the charter schools in their portfolio. DESE recommends the MCPSC practice better record keeping in its communications, in particularly in the event of school closures or application denials.

In addition, DESE recommends the MCPSC develop an “operations guide” or reference book of such sort to formalize all of the MCPSC’s policies and procedures. DESE understands that this guide is already in the MCSPC’s plans for development. We look forward to the development and review of this guide.

**Conclusion**

In conclusion, Missouri Charter Public School Commission is in material compliance with its sponsorship duties per §160.400.17, RSMo, and meets the sponsorship standards of 5 CSR 20-100.260.

Sincerely,



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 Director of Charter Schools

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