

# Responding to NACSA Evaluation Recommendations

## Commendations for Context

- Carefully considered, meaningful performance measures
- Strong support & resource development for schools
- Overall positive relationships between PCSC/staff and schools
- Adoption of strong standards for petitions and renewals
- Strong alignment of policies to best practices for authorizing
- Diverse expertise among commissioners
- Robust pre-opening support program
- Actionable annual reports used by schools
- Transparency of processes and outcomes

## Questions for Today

Is the PCSC in agreement with certain priorities identified by staff?



On what topics would the PCSC like to focus in future discussions?

NACSA's recommendations can be divided (more or less) into 2 categories – the practical and the philosophical.

**Practical:** Work that hasn't been done yet, much of which staff was already working toward prior to the NACSA evaluation. The first question applies to these types of recommendations.

**Philosophical:** Application of work that has already been done. That is, examination of our fidelity to/implementation of structures that already exist. This represents a deeper conversation worthy of a thoughtful approach. This is where we get to the second question.

Suggest that, today, we introduce our recommendations with regard to the practical and gather any PCSC feedback regarding those tasks. Then, identify the PCSC's areas of keenest interest for further discussion in a workshop setting at a special meeting over the summer.

Apply clear quality criteria to evaluate new school petitions.

**STAFF RECOMMENDATION: Gain experience with SoQ as-is. Review after additional use, then adjust to meet identified needs.**

*NP support*

The reviewers felt that some elements of the SoQ were too general and did not adequately describe the details that a quality petition should include. They pushed for returning to a rubric.

Last year, we worked with the petition committee to move away from the rubric because of the inherent issues with having inadequate flexibility to respond to situations unanticipated within the rubric. The result was an SoQ designed to provide clear standards while allowing flexibility for professional judgement.

Plan upon SoQ's adoption was to test drive and amend as shortcomings are identified. Document has only been used twice, would like to experiment more before refining.

Bear in mind that petitioners get additional, specific support and guidance from working directly with staff.

Include external evaluators in the application review process.

**STAFF RECOMMENDATION: Explore further in light of shifting resources over time. Focus on other ways to strengthen application review process.**

Common practice in some states, and one that our staff has periodically considered.

Merits: additional substantiation of staff recommendations to PCSC; possible expertise from across other authorizers and states

Downside – resource-intensive:

Time: Staff time required to contract with and train reviewers, compile & discuss reviews, etc.

Money: In other states, reviewers are paid \$500 or more per application, and each application is read by a team of multiple reviewers.

Expertise: Hesitant to overburden our pool of experts.

Other ways to strengthen process: expanded capacity interviews

Develop & implement a systematic process to evaluate schools on the operational framework that also leverages the renewal site visit.

**STAFF RECOMMENDATION: Crosswalk oversight activities/documents with framework.**

Be more intentional about tying oversight activity clearly to the standards in the framework.

Many of our documents and processes have developed over time in a shifting policy environment. Would benefit from reframing to tie more directly to the framework.

Would like to adjust site visit focus – both ongoing and renewal – to provide education and evaluation that connects clearly to the performance framework. Associated documents, such as the renewal site visit rubric, will be updated accordingly. When interventions are needed, the framework serves as a basis for guiding discussion.

*NP. existing rubric was useful -  
re-design to crosswalk more clearly*

Establish a clear revocation policy and process to ensure that schools can be held accountable to performance expectations in a timely manner.

**STAFF COMMENT: Disagree with NACSA's interpretation of statute. Existing PCSC policy is appropriate. Legislative change would be necessary to allow for mid-term revocation in the absence of renewal conditions.**

NACSA evaluators interpreted statute to mean that PCSC could initiate revocation in the middle of a performance certificate term, even if relevant renewal conditions were not in place. We have explored this thoroughly with legal counsel and disagree.

*NP - more data for whether or not  
board training results in Springer  
schools*

Clarify intervention processes to stipulate triggers for intervention, Idaho PCSC procedural steps, and expectations for school responses.

**STAFF RECOMMENDATION: Develop protocols for triggering, initiating, maintaining, and closing interventions.**

Stepping onto border between practical and philosophical.

Good example of shifting role of PCSC office. Emphasis on “educate and inform before we oversee and enforce.” We see this both in the increased level of training we offer and in the nature of our response with things go sideways at a school. These changes arise both from the desire to make a difference for kids through the authorizing role, and in response to statutory limitations on authorizers’ ability to take action.

For example, new petitions must be decided upon in haste, sometimes before they are ready. Some have gotten approved when they would have done better after an additional year of preparation, and chaos has ensued. In other cases, older schools reached crisis points following long series of bad decisions by their boards.

An authorizer has limited tools with which to enforce change, but we can work with boards to make sure they understand their role, PCSC requirements, and the importance of correcting course. The trick is to appropriately balance autonomy and accountability, helping schools without overruling their boards.

Approach with an attitude of service. Support the board in doing its own work

whenever possible. Focus on the what, not the how – boards still get to make their own decisions.

But, we need to engage to try to protect students and taxpayers. Statute does charge authorizers with continual monitoring of the schools in their portfolios.

This is a relatively new area of work responsive to a changing policy environment. We would like to explore appropriate protocols that balance consistency with professional judgement.

### PESC Questions

- How should the PESC respond when schools fail to meet the standards defined in their performance certificates?
- Should the PESC approve only new charter petitions that meet the standards of quality?
- 1 hour for each of 3 billet points – staff bring materials to frame the conversation

~~Oct 9<sup>th</sup> evening~~  
Sept 19<sup>th</sup> morning

Demonstrate a commitment to high-quality authorizing by implementing adopted policies with fidelity and holding schools to rigorous performance expectations.

- **Approve only petitions from founding teams that have sufficient capacity to oversee and run high-quality schools.** KK
- **Renew only schools that have met the standards for academic performance laid out in the accountability frameworks.**
- **Apply renewal conditions in a timely manner and ensure that performance expectations are enforced each year of the term.**

This is where we really shift to looking at questions surrounding the PCSC's interests and priorities.

We have clear policies and performance expectations in place, but haven't always made decisions in alignment with those policies and expectations. In some cases (renewals) this was legally necessary in the past. In some cases (petition approvals), it has been reflective of certain political pressures.

What would the PCSC like to explore through further discussion? If the PCSC is interested in responding to this recommendation, or elements thereof, how can we as a staff best support you in doing so?

**Possible workshop dates:**

July 22 or 23 (Mon/Tues)

July 30 or 31 (Tues/Wed)

August 14 or 16 (Wed/Fri adjacent to regular PCSC meeting)

August 22 or 23 (Thurs/Fri)

Please let us know if there are certain angles you'd like to be sure are explored, and give us plenty of time to gather any requested data.

*Priorities  
training*

## But that's not all!

Preparation for conditional renewal reviews

Development of CMO evaluation practices

Exploration of policy issues such as increasing diversity in Idaho charters, dissemination of successful models, and increasing availability of high-quality schools.

Training modules under development:

- Governance Role (for school boards)
- Financial Oversight (for school boards)
- Academic Oversight (for school boards)
- Charter School Leadership (for new charter administrators)

CSP grant funds directed to PCSC for technical support.

*Priorities*

*Crosswalking*

*intervention process*

*develop training - available @ our expense*

*- requirements or  
lack thereof can  
be considered  
later*

## Clarify and consistently enforce financial accountability policies.

### **STAFF RECOMMENDATIONS:**

- **Use CSP grant funds to develop intensive board trainings required for new charter school board members.**
- **Build additional oversight into visits and interventions as needed.**
- **Consider financial/operational conditions at time of renewal.**

Still on the border between practical and philosophical.

Evaluators emphasized opportunity to include financial and operational conditions as part of a renewal decision. We recently did this in light of the very troubling situation at BCCLC.

Historically, the decision had been to let the “Darwinian” statutory mechanism for dealing with schools’ financial shortcomings deal with the situation. However, this fails to address problems with poor financial processes or inappropriately expensive decision that nevertheless allow the school to keep its doors open. In other words, a board can make terrible financial decisions over many years, even impacting the delivery of academic programs for students, and there’s nothing an authorizer can do to intervene.

Clarify and expand the current annual planning and goal-setting process to ensure that Idaho PCSC staff and commissioners are setting specific, measurable, attainable, relevant, and time-bound (SMART) goals each year as part of strategic planning.

Overarching concept addressed by other slides.

Our staff does set goals and drive toward them. Is the PCSC interested in similar work for itself, perhaps following through with periodic self-evaluations? If so, do some of NACSA's other recommendations represent areas for focused discussion?