



Oversight Handbook

2020-21

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Part I: Oversight Policy

Introduction and Purpose

The purpose of this policy is to establish oversight and evaluation guidelines for the University of Wisconsin System Administration Office of Educational Opportunity (OEO). OEO adopts this policy to ensure that charter school monitoring and accountability processes will be transparent, merit-based, comprehensive, and equitable. These policies pertain to all charter schools authorized by OEO and serve two purposes: to hold OEO-authorized charter schools accountable, while simultaneously ensuring charter schools' autonomy. OEO acknowledges that the policies and expectations, described below, may evolve over time, based on the needs of the schools in its portfolio.

Performance Framework

[OEO's Performance Framework](#) establishes clear and transparent standards for charter school academic, financial, and organizational performance. The Performance Framework is the primary measurement of charter school performance. Subject to data availability, the academic portion of the Performance Framework is designed to assess charter schools using the same standards as district schools.

The Performance Framework establishes standards to be applied throughout all functions and benchmarks of the charter term, including ongoing monitoring, annual assessments, and renewal criteria. For a full description of all aspects of the Performance Framework—including indicators, measures, methods, and targets—see the performance framework and procedures [published and available on the OEO website](#) (see section "OEO Accountability").

On an annual basis, charter schools will be reviewed according to the standards and measures included in the Performance Framework, and these ratings will be shared in its annual report. OEO will ensure that charter schools receive an advanced copy of their rating and have an opportunity to make factual corrections before the rating is released to the public.

Performance Tiers

OEO has established a rating system centered on the following categories:

1. Academic Performance;
2. Financial Performance; and
3. Organizational performance.

For each of the categories above, charter schools will receive ratings aligned to the targets for each indicator¹. If a school meets the proficiency target, they will receive a rating of "Meets Standard," and if they do not meet the proficiency target, they will receive a "Does Not Meet Standard" rating. The threshold for "Meets" and "Does Not Meet" varies based on the content of a given target.

See the Performance Framework for full details regarding evaluation measures.

Description of Policies

¹ For a definition of target and indicator, see pg. 1 of the Performance Framework.

1. Cycle of Authorizer Actions

a. Site Visits

- OEO will conduct at least one formal site visit during each year of the charter term for each charter school in its portfolio, in addition to the renewal site visit at the end of the charter term.² However, additional site visits may be conducted on an as-needed basis³. Site visits are for the purpose of collecting data or gathering qualitative information that cannot be obtained otherwise and in accordance with the charter agreement, while ensuring that the frequency, purposes, and methods of such visits respect school autonomy and minimize operational interference.
- OEO’s School Quality Review protocol is aligned to the Performance Framework, and articulates the expectations for the site review team and charter schools prior to, during, and after the visit—including review of documents and data, classroom observations and stakeholder interviews.
- Annually, OEO will provide the school with a written report that summarizes the school’s performance against the criteria and indicators addressed by the site visit. The report will present an analysis of relevant data and findings.

b. Renewal

- During each year of a charter school’s term, the school will receive an annual report, which will include ratings aligned to the Performance Framework. Ratings from each year of the charter term will be considered in the ultimate renewal decision. For further details regarding terms of renewal, see the Performance Framework .

c. Meetings

- While OEO does not require any formalized meetings as part of a school’s charter contract, it may convene meetings, should instances of misconduct or noncompliance occur. Additionally, OEO may convene OEO-authorized schools to relay important updates, share best practices, and provide opportunities for professional development or technical assistance.

d. Reporting

- On an annual basis, OEO will provide a site visit report and an annual report⁴ to each school in its portfolio. Additional communication may also be sent to schools on an as-needed basis. All reporting will be aligned to OEO’s Performance Framework.

2. Requirements for Data Reporting and Analysis

All schools are required to submit the following data, through Epicenter, on an annual basis:

- Financial documents
 - Audited financial statements, 120 days after the end of the fiscal year on June 20
 - Proposed budget, no later than June 1 proceeding each academic year
- School-based formative and summative data
 - Annual school accountability plan by September 1 of each school year

² Section 6.4 of the Charter Contract specifies that OEO will conduct one visit per school year.

³ Site visits could be conducted for intervention/compliance purposes, or to better OEO’s understanding of a school’s educational program, operations, or context within the community.

⁴ OEO will share specifics regarding the annual report requirements in the coming months.

- Annual school accountability progress report by August 1 of each school year
- Additional documents
 - School year calendar, to be submitted annually by July 1
 - Grant application, to be submitted to OEO at the time of submission by the charter school
 - Board meeting minutes in advance of each meeting
 - Large vendor contracts and any sub-contracts

3. Operational Intervention

The relationship between OEO and its charter schools is established under the framework of granting autonomy for the promise of results. All data that OEO gathers is focused specifically on operational health and continual improvement. However, there are instances where OEO must focus on noncompliance—please see below.

- OEO has established tiers of intervention corresponding to a range of performance levels tied to appropriate consequences (for a full description, see the Intervention Policy on page 6. OEO may implement consequences within the appropriate Intervention tier at any point in the charter school term when evidence shows low performance against the Performance Framework standards or other contractual requirements. Consequences increase in severity according to the seriousness and duration of the trigger issue, and, in rare cases, may be used as a basis for a recommendation of revocation or nonrenewal of a charter schools' charter.
- In cases of persistent academic underperformance (generally, but not necessarily, lasting one or more academic years), OEO may implement interim noncompliance measures, including a requirement that a charter school follow a Performance Improvement Plan (PIP), which will detail specific strategies and tools for immediate improvements to the charter school's educational plan. The PIP will include specific student achievement targets aligned with the performance framework, deadlines for implementation, and ongoing progress reporting requirements. Charter schools that implement PIPs and do not meet the required student achievement targets will be considered for further intervention, including the potential for revocation or nonrenewal. OEO's Intervention Policies, found on page 6, describes PIPs and interim noncompliance measures in detail.
- Please note that, in addition to the Intervention Policy, OEO may also recommend that The Board of Regents of the University of Wisconsin System suspend a school's charter, should a school fail to meet criteria outlined under Article Nine, Section 9.1⁵ of the charter contract.

4. Preserving and Enhancing Charter School Autonomy

- OEO will respect charter schools' authority over its day-to-day operations.
- OEO will collect information from the charter schools that it oversees in a manner that minimizes administrative burdens on the schools, while ensuring that performance and compliance information is collected with sufficient detail and timeliness to protect student and public interests.
- OEO will focus its evaluation efforts on the performance standards set forth in the charter agreement and present its analyses in a straightforward manner that clearly indicates whether a charter school is meeting or making progress towards meeting the standards and criteria for renewal. Evaluation reports and presentations will not prescribe solutions to those areas not

⁵ These criteria include financial mismanagement, failure to make academic progress, failure to comply with state or federal laws and regulations, or other material default under other contract obligations.

meeting standards and identified in need of improvement, except for any area of non-compliance as required by federal or state law.

- OEO will periodically review its compliance requirements and evaluation procedures to uphold charter school autonomy based on flexibility in the law, streamlining requirements, demonstrated school performance, or other considerations.

Part II: Intervention Policy

Introduction and Purpose

The fundamental responsibility of OEO is to ensure quality charter school oversight that maintains high standards of school performance, upholds school autonomy, and safeguards student and public interests. One of the primary mechanisms for fulfilling this purpose is a comprehensive accountability system that sets clear standards of performance, protects school accountability, and includes oversight to evaluate performance and monitor compliance. Through ongoing monitoring of school performance, OEO may determine that a school’s academic, financial, or operational performance does not meet the established standards. To that end, OEO has established an intervention policy for how it responds to areas of deficiency in a fair, transparent, and consistent manner. This intervention policy describes merit-based interventions, including termination where appropriate, in response to clearly identified deficiencies in schools’ records of academic, financial, or organizational performance.

The Intervention Process

The Table of Interventions, found below, outlines the general conditions that may trigger interventions by OEO, including types of actions and consequences. The outlined procedures are not a sequential process. OEO reserves the right to skip levels of intervention, as necessary, and to move toward immediate termination in the case of a school’s financial insolvency or if the school poses a significant risk to the health or safety of students.

Conditions that Trigger Intervention

The conditions that could trigger intervention are directly aligned to performance expectations outlined under criteria outlined in Article Nine, Section 9.1 of the charter contract and under the [Performance Framework](#).

| Status ² | Possible Triggers | May Result In ³ |
|-------------------------------------|--|--|
| <u>Level 1</u> Notice of Concern | <ul style="list-style-type: none"> • Signs of weak student performance and/or the school is not on track to meet academic targets outlined in its performance framework, as identified through performance reviews, or through any other means identified by OEO. • Signs of financial weakness identified through an annual financial audit. • Rating of “does not meet standard” in multiple areas of the performance framework for one year. • Repeated failure to submit required documents on a timely basis. | <ul style="list-style-type: none"> • Letter to the school’s governing board detailing areas of concern. |

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| <p><u>Level 2 Notice of Deficiency</u></p> | <ul style="list-style-type: none"> • Rating of “does not meet standard” in several areas of the performance framework for two or more years. • Signs of significant financial weakness identified through an annual financial audit. • Failure to comply with applicable state laws, state board rules/policies, or other regulations. • Failure to comply with terms of charter agreement with OEO. | <ul style="list-style-type: none"> • Letter to the school’s governing board detailing areas of deficiency with a requirement that a Performance Improvement Plan (PIP) be developed and implemented (with specific improvements, objectives, timelines, and measures). The PIP must be approved by OEO. |
| <p><u>Level 3 Notice of Probationary Status</u></p> | <ul style="list-style-type: none"> • Continued failure to meet performance targets (state accountability, charter contract, or performance frameworks). • Failure to meet objectives set forth in the PIP. • Continued or significant signs of financial weakness identified through annual financial audits or other means. • Continued or significant failure to comply with applicable state laws, state board rules/policies, or other regulations. • Continued or significant failure to comply with conditions of the charter agreement. | <ul style="list-style-type: none"> • Letter to school’s governing board, which serves as notice of probationary status and outlines terms of probation. |
| <p><u>Level 4 Charter Review</u></p> | <ul style="list-style-type: none"> • Pattern of failure to comply with or meet performance targets (state accountability, charter contract, or performance framework). • Three consecutive years of achieving “does not meet standard” in several areas of the performance framework. • Failure to successfully address the terms of the probationary status, including the PIP. | <ul style="list-style-type: none"> • Recommendation to revoke the charter contract or to impose lesser sanctions including, but not limited to, a requirement to adopt an interim reconstitution plan that may include the appointment of an interim governing board and/or a governing board chairperson. |

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| <p><u>Level 5</u> <u>Charter Revocation</u></p> | <ul style="list-style-type: none"> Continued pattern of failure to comply with or meet performance targets (state accountability, charter contract, or performance framework). Five consecutive years of achieving “does not meet standard” in several areas of the performance framework. Continued failure to successfully address the terms of the probationary status, including the PIP. | <ul style="list-style-type: none"> Recommendation to revoke charter contract. Charter closure timeline goes into effect immediately. |
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Formal Intervention

OEO will only initiate formal intervention for school deficiencies or violations that are considered “material.” According to NACSA’s [Core Performance Framework and Guidance](#), “As a legal term, something is ‘material’ if it is relevant and significant...the authorizer should consider whether the information would be relevant and significant to decisions about whether to renew, non-renew, or revoke a charter” (65). For deficiencies or violations not considered material (e.g. turning in a report a day late), OEO will record the issue and provide the school an informal notification prior to, or instead of, initiating formal intervention.

Notice

OEO will provide detailed and timely notice of concerns and a reasonable opportunity for schools to remediate any concerns. All notifications to schools will include clear information on consequences for performance deficiencies. Written documentation of a given deficiency will include OEO’s specific expectations for remedy, a timeline, and the expected deliverable to demonstrate resolution. OEO will provide the written notice to the school’s board, as well as its school-level leadership, as the board is ultimately responsible for the charter. In some cases, interventions will warrant a formal Performance Improvement Plan (PIP).

