To: Members of the Orleans Parish School Board and Superintendent Williams From: Team LAPCS Date: December 9, 2022 Re: OPSB's Charter Renewals & Comprehensive Evaluation Processes

To Whom It May Concern:

The mission of the Louisiana Association of Public Charter Schools is to advance equity and educational access through the advocacy, support, and promotion of excellent charter schools in Louisiana. We strive to achieve these goals so that all of Louisiana's children can reach their full potential. As such, the best interest of students has always been our north star–which is why LAPCS consistently advocates for high-quality charter schools, laws, and policies rooted in standards that are fair, equitable, and transparent. After all, excellent charter schooling and exceptional student outcomes begin with great authorizing.

With that in mind, LAPCS supports the district's recent charter renewal recommendations. The recommendations ultimately reflected objective CSAF policy indicators, including transparent performance metrics as well as progress, years of operation (including performance over time), and the ability of students to enroll in higher-performing open-enrollment schools. We likewise support the confirming public vote by members of the board. We believe publicly ratifying the renewal or non-renewal of a contract between the board and a charter operator is a cornerstone in the relationship between the authorizer and the charter school governance community. However, it should be noted that as a matter of governance best practices, LAPCS recommends that major action items be noticed in advanced and held at time convenient for maximum participation as a courtesy to interested parties and the greater public.

Yet despite our overall support for the district and its renewal decisions, we would be remiss if we didn't use this opportunity, on behalf of our member schools, to highlight areas where we believe the district's chartering processes and practices can be improved and strengthened for the benefit of the overall school system, the greater public, and ultimately the students of New Orleans.

The district's comprehensive evaluation process is a unique opportunity that can help provide due process to a charter school on the verge of non-renewal. School closures can be painful for families and staff as well as disruptive to the entire school system. Thus, having a process whereby a charter school is given ample time and a formal, public venue to discuss its strengths and proposed corrective action plans can help ease some of those hardships. Additionally, the comprehensive evaluation process can help balance some of the design shortcomings in the state's larger and imperfect accountability system, as well as help account for Acts of God and other disruptive elements that unfairly negate a school's performance in any given year. As a result, we generally support comprehensive evaluations as a useful tool for authorizers to prioritize the best interests of students when undergoing holistic considerations of charter renewals.

But while we commend the district for appropriately embracing comprehensive evaluations, we know from school feedback that there is room for improvement. Specifically, school leaders suggest that more detailed and transparent comprehensive evaluation standards, along with more established timelines and enhanced communications, would help better manage expectations for all parties from start to finish. As we have

consistently advocated to all authorizers, the very nature of the charter contract with clearly outlined terms of performance helps remove politics from the decision-making process so that decisions remain rooted in outcomes for students, including those under a comprehensive review.

However, LAPCS recognizes that comprehensive evaluations also provide an unusual circumstance whereby the authorizer intentionally evaluates the school using additional indices beyond bright-line performance metrics. While this presents a unique opportunity to showcase how a school is more than its letter grade, it also creates the risk that subjective indices could heavily influence the overall determination. LAPCS member schools who have undergone this evaluation process over the past three years have consistently lamented that they are unsure what indices the district wants to examine and the reasoning thereof. Schools also point to inconsistencies around what data points are utilized and question why evaluations are limited against only those undergoing the process at the same time instead of against the district's portfolio. Additionally, schools often find evaluation indices too subjective–creating a scenario whereby some are, at best, out of a school leader's control and others, at worst, could be easily manipulated by a school or authorizer to obtain a desired outcome.

LAPCS is excited by district conversations around rewriting the CSAF (which currently has benchmarks that many believe are no longer appropriate for the system), reviewing schools and the school system more holistically, and exploring how the Portrait of a Graduate can influence powerful and innovative solutions that improve the lives of students inside schools and across the city. However, we caution against relying upon unofficial and self-reported indices that are not focused on outputs and have the potential for unintended, negative consequences that skew as political decisions.

LAPCS encourages the district to continue engaging with other authorizers across the state and the country. Many authorizers, including the Louisiana Department of Education and Jefferson Parish, have recently expounded on policies first enacted by NOLA-PS for the betterment of their portfolio of schools–both in how they examine charter schools and in how they review and consider performance across all schools. We are very fortunate in Louisiana to have many interested parties that have collectively problem-solved and pushed each other toward excellence. We hope you continue to engage in that great and rich tradition that helps lift all students and schools.

LAPCS greatly values our relationship with this district, as much as we do with our member schools. This is a long and trusted relationship centered around honest conversations and collaboration to best support students. The work of an authorizer is never easy and is often underestimated by members of the public. We appreciate your team and your service on behalf of students and schools.

We look forward to continuing to work together to improve policies, practices, and procedures at the school and district levels so that all New Orleans students will be able to attain their fullest potential.

Many thanks for your time, efforts, and consideration,

Caroline Roemer, Sarah Vandergriff Kelley, and Team LAPCS