

# Authorizer Standards System & Process Elements

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## Definition and Terms

Administrative capacity

Financial capacity

Organizational capacity

To include governance and management structures

[EMP: Education Management Provider](#)

## System & Process Elements for Authorizers of Multi-District Online Schools

### CDE Review and Certification Criteria

It is recommended that the following system and process elements serve as the basis for the Colorado Department of Education's review and certification of authorizer's of multi-district online schools.

Evidence according to each standard/area should be utilized as the foundation for evaluation and decision-making regarding authorizer capacity to successfully authorize multi-district online schools.

It is recommended that the Colorado Department of Education collect signed assurances for those standards that speak to a local district's commitments. Alternatively, for those standards that either identify local polices to be created, or ask an authorizer to describe an approach to quality authorization, CDE shall seek, through written application, information from applying districts about their existing policies, new policies, and plans for implementing these standards.

[Some of the evidence elements below differ in requirement depending on whether the authorizer is new \(not currently authorizing any multi-district online schools\) or renewing \(currently authorizing multi-district online schools\). Therefore, each piece of evidence is labeled N for New Authorizer and/or R for Renewing Authorizer. Additionally, the requirements for each piece of evidence can be satisfied by the authorizer via an assurance and/or documentation. Each piece of evidence is labeled A for assurance, AS for assurance with sample documentation, and D for documentation.](#)

[Key:](#)

[N=New Authorizer; R=Renewing Authorizer; A=Assurance; AS=Assurance with Sample documentation; D=Documentation](#)

### Evaluation

Standard / Area	Evidence
Authorizer Commitment and Capacity	1) Ensure the district mission statement is inclusive of multi-district online schools (District or BOCES commitments to be made through assurances to CDE) <a href="#">(N: A), (R: A)</a>

Standard / Area	Evidence
	<ul style="list-style-type: none"> <li>a) Assurances that the authorizer <u>(N: A), (R: A)</u> <ul style="list-style-type: none"> <li>i) Will hold schools accountable for their performance <u>(N: A), (R: A)</u></li> <li>ii) Has expertise in implementing and supporting online learning as differentially appropriate for traditional vs charter models. <u>(N: A), (R: A)</u></li> </ul> </li> <li>b) <del>Promise Assurance</del> of accountability to the public <u>(N: A), (R: A)</u> <ul style="list-style-type: none"> <li>i) For the proper stewardship of educational resources <u>(N: A), (R: A)</u></li> <li>ii) To commit to offering quality, sustainable education options to students <u>(N: A), (R: A)</u></li> </ul> </li> <li>2) Demonstrate sufficient staffing and expertise <u>(N: D), (R: D)</u> <ul style="list-style-type: none"> <li><del>a) Demonstration of prior performance (not limited to management of online schools), if available</del> <ul style="list-style-type: none"> <li><del>i) To include local or state measures of success for students participating in existing online programs or schools operated by the district or BOCES.</del></li> <li><del>ii) To include local or state performance measures of success for existing charter or contract schools authorized by the district or BOCES</del></li> </ul> </li> <li><del>b)a) Description of the responsibilities of the district or BOCES personnel and teachers, and their qualifications <u>(N: D), (R: D)</u></del></li> <li><del>e)b) Describe and provide rationale for staff time (or equivalent) and financial resources devoted to authorization activities <u>(N: D), (R: D)</u></del></li> <li><del>e)c) Demonstration of plan for district or BOCES personnel and teacher professional development <u>(N: D), (R: D)</u></del></li> </ul> </li> <li>3) Transparent expenditures. <u>(N: A), (R: A)</u> <ul style="list-style-type: none"> <li>a) Expenditures on oversight and support of multi-district online schools should be annually reported <u>(N: A), (R: A)</u></li> </ul> </li> <li>4) Demonstrate commitment to ongoing authorizer quality improvement. <u>(N: A), (R: A)</u> <ul style="list-style-type: none"> <li>a) Plan for evaluation of its authorizing practice against state standards for quality multi-district online school authorizing and recognized effective practices and development of improvement plans, as needed. <u>(N: A), (R: A)</u></li> </ul> </li> </ul>
School Application Process and Authorizer Decision Making	Districts and BOCES who are certified as multi-district online school authorizers may decide to directly manage and operate multi-district online schools. Similarly, Districts and BOCES may choose to establish a contract with an educational service or management provider. Separately, districts may also choose to authorize charter schools or contract schools. The following

Standard / Area	Evidence
	<p>components and criteria for an application process may be used by a district choosing to directly manage and operate schools as components and criteria for plans, rather than for applications to be reviewed. As such, the terms “application/plan” will be used throughout the section. Districts or BOCES planning to play both direct management, and charter, contract or service provider authorization roles should address their processes for both in their application.</p> <p>Description of the application/plan and review process the authorizer will use to make decisions regarding the granting of new multi-district online schools. The following elements should be included in processes for charter or traditional models, with or without <u>ESPEMPs</u>. (N: A), (R: A)</p> <div data-bbox="540 793 1161 940" style="border: 1px solid black; padding: 5px;"> <p><u>OTF Member Comment</u>  <u>Wouldn't these be the same? Under what circumstances might the components and/or criteria differ between a plan (in-house) and an application (charter or educational service provider?)</u></p> </div> <ol style="list-style-type: none"> <li>1) Ensure Transparency. (N: A), (R: A) <ol style="list-style-type: none"> <li>a) Explanation of rights and responsibilities of both authorizer and applicant (N: A), (R: A)</li> <li>b) Evidence that training and supports for school staff are sufficiently provided. (N: A), (R: A)</li> </ol> </li> <li>2) Establish rigorous performance standards aligned to the state accountability system. (N: A), (R: A) <ol style="list-style-type: none"> <li>a) Identify sources of academic outcomes data that will form the evidence base for decision making (including but not limited to the CDE SPF) (N: A), (R: A) <ol style="list-style-type: none"> <li>i) 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 (N: A), (R: A)</li> </ol> </li> <li>b) Identify sources of financial data that will form the evidence base for decision making, grounded in professional standards for sound financial operations and sustainability (N: A), (R: A)</li> <li>c) Define the sources of organizational data that will form the evidence base for decision making, focusing on fulfillment of legal obligations, fiduciary duties, and sound public stewardship (N: A), (R: A)</li> </ol> </li> <li>3) Implement rigorous decision making criteria and practices <ol style="list-style-type: none"> <li>a) Evidence of rigorous application evaluation criteria and evidence of transparent and consistent procedures for</li> </ol> </li> </ol>

**Comment [MS1]:** OTF members need to provide a list of components and criteria for each: plan and application

Standard / Area	Evidence
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decision making. (N: A), (R: A)  
 b) Evidence that performance outcomes serve as the primary basis for decision making. (N: A), (R: A)

Suggested Addition	OTF Member Comment
Evidence of outcomes of decision making that reflect denial of transfer of existing schools rated as Turnaround or Priority Improvement OR denial of new school applications supported by ESPs with track records including a predominance of supported schools rated as Turnaround or Priority Improvement	

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b)

- 4) Define a timeline for local application and oversight processes (N: A), (R: A)
  - a) Clearly defined timeline for submission, review, and decision making. (N: A), (R: A)
  - b) Clearly defined timeline for oversight procedures (N: A), (R: A)

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Performance Contracting

Suggested Change	OTF Comment(s)
Performance Contracting (if applicable)	

- 1) Clearly identifies essential and material terms to be included in performance contracts. (N: AS), (R: A)
  - a) Description of rights and responsibilities of both parties, including scope of service and deliverables. (N: AS), (R: A) EMP
  - b) Description of performance standards reliant on objective, verifiable, and state aligned data sources to be included in performance contracts. (N: AS), (R: A)
  - c) Description of services appropriate for all students, including those with disabilities, gifted and talented, English Language Learners, or students identified "at risk." (N: AS), (R: A)
  - d) Description of processes for successful entry to and exit from the school, including transition to another school, if necessary, for all students (N: AS), (R: A)
  - e) Description of student and family engagement, and community outreach (N: AS), (R: A)
  - f) Membership of school (FTE) (N: AS), (R: A)

OTF Member Comment
Not sure I understand what this means. Do they mean the number of students? Demographic info about the students they expect to serve? Kind of

Standard / Area	Evidence
	<p><u>confusing.</u></p> <p>f)</p> <p>g) Evidence that training and supports for school staff are sufficiently provided <u>(N: AS), (R: A)</u></p> <p>h) Terms of any facility agreement that may be part of the relationship <u>(N: AS), (R: A) EMP</u></p> <p>i) Disclosure and explanation of any existing or potential conflicts of interest between the school governing board and proposed service provider or any affiliated business entities <u>(N: AS), (R: A) EMP</u></p> <p>i) Clear establishment of the primacy of the multi-district online school contract over the third-party contract <u>(N: AS), (R: A)</u></p> <p>ii) Clear identification of the multi-district school governing board as the party ultimately responsible for the success or failure of the school, and clearly define the external provider as a vendor of services <u>(N: AS), (R: A)</u></p> <p>iii) Prohibition of the third party from selecting, approving, employing, compensating, or serving as school governing board members <u>(N: AS), (R: A)</u></p> <p>j) Requirement that all instructional materials, furnishings, and equipment purchased or developed with public funds to be the property of the school, not the third party <u>(N: AS), (R: A) EMP</u></p> <p>k) Assurances that the school governing board, at all times, maintains independent fiduciary oversight and authority over the school budget and ultimate responsibility for the school's performance <u>(N: AS), (R: A) EMP</u></p> <p>l) Clarifies responsibilities of the governing board and service provider in the event of school closure <u>(N: AS), (R: A) EMP</u></p> <p>2) Defines performance standards aligned to state accreditation <u>(N: AS), (R: A)</u></p> <p>a) Define clear, measurable, and attainable academic, financial, and organizational performance standards and targets that the school will utilize when determining renewal, including but not limited to state and federal measures <u>(N: AS), (R: A)</u></p> <p>b) The performance measures, consequences, and mechanisms by which the school governing board will hold the provider accountable for performance, aligned with the performance measures in the charter contract <u>(N: AS), (R: A)</u></p> <p>3) <del>Describes</del> <u>Assures</u> practices adopted by the authorizer to</p>

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**Comment [MS2]:** Need to sort this section by EMP and non-EMP

Standard / Area	Evidence						
	<p>ensure alignment with national best practice recommendations for educational service provider contracting. <u>(N: A), (R: A) EMP</u></p> <table border="1" data-bbox="581 478 1156 569"> <thead> <tr> <th data-bbox="581 478 868 506"><u>Suggested Change</u></th> <th data-bbox="868 478 1156 506"><u>OTF Member Comment</u></th> </tr> </thead> <tbody> <tr> <td data-bbox="581 506 868 569"><u>Delete "their" from a, b, &amp; c</u></td> <td data-bbox="868 506 1156 569"></td> </tr> </tbody> </table> <p>3)</p> <ul style="list-style-type: none"> <li>a) Documentation of their educational, organizational, and financial performance records based on all existing schools (if applicable) <u>(N: A), (R: A)</u></li> <li>b) Presentation of their growth plan, business plan, and most recent financial audits <u>(N: A), (R: A)</u></li> <li>c) Clear evidence of their capacity to operate new schools successfully while maintaining quality in existing schools (if applicable). <u>(N: A), (R: A)</u></li> </ul>	<u>Suggested Change</u>	<u>OTF Member Comment</u>	<u>Delete "their" from a, b, &amp; c</u>			
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Ongoing Oversight and Evaluation	<ul style="list-style-type: none"> <li>1) Outcomes-based annual review process. <u>(N: D), (R: D)</u> <ul style="list-style-type: none"> <li>a) Description of the activities of the review process, including site visits (if any, physical and/or virtual), review of enrollment trends, types of outcomes data used, financial audits, and annual report creation, and how these will be used in decision making <u>(N: D), (R: D)</u></li> <li>b) Description of comprehensive review of performance outcome data that is inclusive of review of both SPF and UIP <u>(N: D), (R: D)</u></li> </ul> </li> <li>2) Transparent compliance monitoring. <u>(N: A), (R: A)</u> <ul style="list-style-type: none"> <li>a) Description of compliance monitoring systems and procedures <u>(N: A), (R: A)</u></li> </ul> <table border="1" data-bbox="618 1171 1156 1377"> <thead> <tr> <th data-bbox="618 1171 889 1199"><u>Suggested Change</u></th> <th data-bbox="889 1171 1156 1199"><u>OTF Member Comment</u></th> </tr> </thead> <tbody> <tr> <td data-bbox="618 1199 889 1377"><u>Add with clear technical guidance to schools as needed to ensure timely compliance with applicable rules and regulations</u></td> <td data-bbox="889 1199 1156 1377"></td> </tr> </tbody> </table> <ul style="list-style-type: none"> <li>a) <del>Provides clear technical guidance to schools as needed to ensure timely compliance with applicable rules and regulations</del></li> <li>b) Assurance that monitoring will be minimally invasive and in line with school autonomy. <u>(N: A), (R: A)</u></li> </ul> <table border="1" data-bbox="618 1549 1156 1671"> <thead> <tr> <th data-bbox="618 1549 1156 1577"><u>OTF Member Comment</u></th> </tr> </thead> <tbody> <tr> <td data-bbox="618 1577 1156 1671"><u>Invasive is in the eye of the beholder, and the authorizer has a right to establish monitoring procedures based on changing need.</u></td> </tr> </tbody> </table> <ul style="list-style-type: none"> <li>c)</li> </ul> </li> <li>3) Transparent timelines <u>(N: A), (R: A)</u></li> </ul>	<u>Suggested Change</u>	<u>OTF Member Comment</u>	<u>Add with clear technical guidance to schools as needed to ensure timely compliance with applicable rules and regulations</u>		<u>OTF Member Comment</u>	<u>Invasive is in the eye of the beholder, and the authorizer has a right to establish monitoring procedures based on changing need.</u>
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Standard / Area	Evidence
Review and Accountability	<p>a) Description of timeline for review (annually, at a minimum) and provision of feedback <a href="#">(N: A), (R: A)</a></p> <p>For authorizers who directly operate a multi-district online school, these standards refer to decisions or actions the district would take as part of ongoing review and intervention.</p> <p>For authorizers of charter or contract schools, or authorizers who contract with an educational service or management provider to manage one or more multi-district online schools, these standards guide actions and decisions related to: review, renewal, intervention, and revocation.</p> <p>1) Transparent review procedures <a href="#">(N: D), (R: D)</a></p> <p>a) District plan explains procedures for review, as well as, how those procedures will be made transparent and clearly communicated. <a href="#">(N: D), (R: D)</a></p> <p>b) Description of procedures and timelines for review, renewal, intervention and revocation using clearly defined criteria for renewal, and charter revocation processes (if applicable), and provides clear guidance regarding performance concerns, available remedies, and support to be provided by the authorizer <a href="#">(N: D), (R: D)</a></p> <p>2) Outcomes-based review <a href="#">(N: D), (R: D)</a></p> <p>a) District plan describes a comprehensive body of evidence that includes, at a minimum, the SPF and UIP, to be analyzed in making all intervention and/or renewal decisions. <a href="#">(N: D), (R: D)</a></p> <p>3) Consistent and clear report and recommendation making process <a href="#">(N: A), (R: A)</a></p> <p>a) District plan describes the basic content of comprehensive reports the authorizer will provide to schools in advance of intervention or renewal decision making. <a href="#">(N: A), (R: A)</a></p> <p>4) Rigorous decision making procedures <a href="#">(N: A), (R: A)</a></p> <p>a) When applicable, the authorizer grants renewals of schools or service contracts only for schools meeting expectations of performance, as defined in district policy or the performance contract. <a href="#">(N: A), (R: A)</a></p>

### Further Recommendations

1. Review and certification of all authorizer's currently overseeing multi-district online schools be completed on or before January 1, 2016.

<del>OTF Comment(s)</del>	◀
<del>"January 1, 2016 provides only six (6) months to do this work."</del>	◀
<del>"How does this fit with current legislation?"</del>	◀
1. TBD	

New authorizers, February, 2016.

2. Ongoing reviews of all authorizers of multi-district schools occur every 5 years.

Suggested Change	OTF Comment(s)
<b>Ongoing reviews of all authorizers of multi-district schools occur every 5 years so long as School Performance ratings remain at either "Performance" or "Improvement." The state reserves the right to modify the frequency of review for an authorizer of one or more multi-district online schools in priority improvement or turnaround status</b>	
<u>Tiered renewal process based on performance rating of district or its schools (using online school ratings only, or online and brick and mortar school ratings): 3 year renewal cycle for authorizers (and/or its schools) rated at or below a determined rating; 5 years for authorizers (and/or its schools) rated above a determined rating.</u>	
<u>Tiered renewal timeline based on the authorizer's current certification date</u>	
	<u>(5 years) seems only reasonable. If schools fall below performance or improvement, additional support, remedies, and reviews are warranted.</u>

3. The CDE is charged with clarifying the effect on a multi-district on-line school if the school's authorizer loses certification, including but not limited to establishing and making known to schools the types of actions and consequences that they may.

Suggested Change	OTF Comment(s)
The CDE is charged with clarifying the effect on a multi-district on-line school if the school's authorizer loses certification, including but not limited to establishing and making known to schools the types of actions and consequences <b>(omit that)</b> they may face.	

- a. Any State Board Decisions to remove authorizing capacity from a district, BOCES or CSI as of July 1 of any year must be made by July 20 of the prior year.

Suggested Addition	OTF Comment(s)
<b>A district's current DPF rating should be considered when weighing the evidence</b>	

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<b>regarding capacity to perform authorizing duties</b>	
	<p><u>Any authorizer should not face automatic disqualification based on the performance rating, but that rating should be taken into account in regard to its capacity to authorize, particularly if it is applying to be a new authorizer. If a district is already struggling with performance, it stands to reason that it likely does not have the capacity to take on additional duties in this area.</u></p>

DRAFT

