



March 1, 2023

Dr. Lisa Sireno, Assistant Commissioner
Office of Quality Schools
Department of Elementary and Secondary Education
PO Box 480
Jefferson City, MO 65102-0480

TRANSMITTED VIA EMAIL: msip@dese.mo.gov

RE: MSIP 6 Comprehensive Guide and the FY22 Annual Performance Report

Dear Dr. Sireno,

In Missouri, districts are accredited, but charter schools are not. Instead of accreditation for charter schools, the Missouri Legislature established the role of the charter school sponsor to hold charter schools accountable. State statutes require charter schools to have limited term contracts and close if the sponsor determines they are not meeting the terms of the contract. The law give the State Board of Education responsibility and authority to hold charter school sponsors accountable.¹ This is the accountability system the General Assembly created for charter schools in Missouri. However, the MSIP6 Comprehensive Guide (Guide) and the Annual Performance Report (APR) seam to ignore the way charter schools operate under state law. Your commitment to accuracy and fairness, which we share, requires the APR and the Guide to reflect the differences of charter school accountability.

ANNUAL PERFORMANCE REPORT

1. All Missouri charter schools participate in the state's annual assessment program, as required by statute. The Department is required to issue an Annual Performance Report on charter schools. The Commission has consistently objected to the inclusion of charter schools in MSIP standard, which are outside of the parameters outlined in statutes. Specifically, the inclusion of charter schools in continuous improvement, resource and process standards. **The Commission requests that a charter school APR only include results of performance standards and the participation rates for the content tests given by that charter school.** This fulfills the Department's requirement to publish an APR for charter schools and is in alignment to statutes requiring charters to participate in the MAP and EOC assessments.

¹ For full description of Missouri's charter school accountability system, see MSCPA white paper at <https://mcpssc.mo.gov/media/pdf/understanding-charter-public-schools-accountability>

Nothing prohibits the Department from creating a charter specific APR. The Department created a separate APR for K-8's, because the K-12 APR misrepresented K-8 MSIP accountability. Because charter schools are not subject to accreditation, process and resource standards, continuous improvement and accreditation sections of the new APR do not apply and misrepresent charter accountability.

2. According to the Department, charter schools have the option, not the requirement, to participate in the Comprehensive School Improvement Plan section of the MSIP. While the Commission's position remains that charter school APRs should only contain academic performance measures, we also believe in the autonomy of charter schools. **Therefore, for charter schools electing to participate in CSIP they should be awarded points based on their submission. The Commission requests the Department follow their Guide and not publish any Improvement Plan points until the FY24 APR.**²
3. Missouri Statutes grant charter schools the autonomy to determine their academic program, as long as they align to state standards. K-8 charter schools are not required to offer high school courses. School boards have the right to choose the academic program that best meets the needs of their students. The Guide states, "If an LEA cannot generate data for a particular standard or indicator due to its grade span, points for that indicator are removed from the numerator and denominator of the percentage"³ Schools that do not offer an EOC cannot generate points. **The Commission requests the High School Readiness (HSR) standard only be published on APRs for charter schools using EOCs. Furthermore, we request that charters assessing 8th grade students using the grade appropriate assessment are not unfairly penalized 10 points.**
4. We believe the Department is committed to accurately representing the performance of LEAs and school buildings in Missouri. The Commission and several of the schools we sponsored have reached out the Department to challenge the accuracy of some of the data presented. We appreciate the Departments response to several requests. **The Commission respectfully requests the following corrections also be made:**
 - **Correct the name on Guadalupe Centers Schools' APR (instead of Alta Vista.)**
 - **Removed HSR from Brookside Charter School's APR. They did not offer an EOC in FY22.**
 - **Subjects assessed by a charter school should be listed on the APR. All others should be excluded. This is not consistently applied.**
 - **Any APR standard where charter schools are not required to participate – and did not participate – should be removed from the APR.**

² Page 10, Comprehensive Guide to MSIP 6, 11/28/22

³ Page 8 & 11, Comprehensive Guide to MSIP 6, 11/28/22, "LEAs and schools are scored only on measures which they generate data."

- Items that are “not applicable” should be represented by “N/A,” instead of a “0” and “0%” percentage. The number “0” infers the school is not complying.⁴
- Several schools have expressed frustration that the data submission for the IRCs was confusing, including having a button that said “optional.” These schools should be allowed to have their IRCs included in the calculation in the Advance Credit and/or CET Expansion points, for those schools choosing to be included.
- Building level APRs should only include performance measures.⁵ All other points are the responsibility of the LEA, their policies, budgets and HR decisions.
- The audit section in the APR pertains to the same fiscal year as the report. State statute requires the submission of audits to DESE no later than December 31. Therefore, no future APR can be issued before the submission date of the audit. The Department should consider using the prior year’s audit.

COMPREHENSIVE GUIDE

1. The Guide states MSIP is “for reviewing and accrediting Local Education Agencies.” Charter schools can be LEAs and are not accredited. The statutes concerning accreditation pertain to districts. **The Commission requests the Department revise the guide to include a section only pertaining to charter schools. The Commission also requests that the development of the section on charter schools involve charter school sponsors.**
2. Given the multiple changes in the APR under MSIP 6 from MSIP 5, **the Commission recommends the Department add a data source section in the Guide.** This section would explain the sources and uses of data in determining standard performance. This section would include where the data can be found and the date or time period of the data to be used. When possible, links would be included in the Guide to easily find the data source.

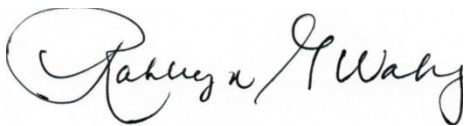
⁴ See Atlas Public School APR where the test data results are represented by an N/A since they did not have any testing grades.

⁵ Page 11, Comprehensive Guide to MSIP 6, 11/182/22

3. Finally, the Department is well aware of the performance differences of some socio-economic groups. In fact, the Department has provided a special category and different performance expectations for the “student group.” Sadly, the Department has chosen to weight the performance of the “student group” at 6 points, or half the points as “all students.” For LEAs with a majority of its student population classified in the student group, their all student group will be - if not exactly, nearly the same as the all student group. The Department has acknowledged the historic performance below state average. It should not continue to misrepresent performance success of these student and the schools that serve them by only awarding half the points. **The Commission recommends the Department make student group points worth 12 points as well.**

The Commission applauds DESE for continuing to work hard to hold all public schools accountable for the people who pay for them and especially for the people who depend on them. We will continue to be your partner in making sure the performance of charter schools is accurately depicted in reports from both our agencies.

Sincerely,

A handwritten signature in black ink that reads "Robbyn Wahby". The signature is written in a cursive, flowing style.

Robbyn Wahby
Executive Director

CC: Members, Missouri Charter Public School Commission (MCPSC)
School Leaders and Board Chairs, MCPSC Portfolio
Missouri Charter Public School Association
Missouri Charter School Sponsors