

IDEA Public Schools: 2019-20 Recruitment Waitlist
Exhibit A



Waitlist Region School	Grade pk4	k	1	2	3	4	5	6	7	8	9	10	11	12	District
Austin		1,019	715	602	569	391	414	772	405	222	205	132	51	30	5,527
IDEA Bluff Springs		120	57	52	70	68	75	69	49	33	46				638
IDEA Health Professions		210	181	180			33	161							764
IDEA Kyle		140	81	61	65			77	49						472
IDEA Montopolis		96	81	72	125	119	96	122	97	88	81	69	51	30	1,125
IDEA Parmer Park		162	126	97			65	126							576
IDEA Pflugerville		199	138	77	182			101	121						818
IDEA Rundberg		92	52	63	128	205	146	117	89	101	78	64			1,134
El Paso	782	539	416	241	194			410	137						2,718
IDEA Edgemere	317	208	110	148				121	84						988
IDEA Mesa Hills	285	203	197					159							843
IDEA Rio Vista	180	127	109	92	194			131	54						887
Lower Valley	867	677	651	632	493	541	527	674	427	270	224	203	105	48	6,339
IDEA Alamo	104	68	83	71	79	77	91	72	57	33	29	16	23	11	816
IDEA Brownsville		117	65	78	100	132	107	67	94	69	53	55	30	11	979
IDEA Elsa	93	38	63	50				70	50						365
IDEA Frontier	170	40	50	44	57	55	62	44	57	43	27	29	11	6	693
IDEA Riverview	196	58	67	69	86	91	74	95	54	39	36	37			901
IDEA Robindale		131	126	145				140							542
IDEA San Benito	145	78	81	86	59	88	76	67	41	27	29	27	19	8	829
IDEA Weslaco		78	43	26	48	49	55	47	25	29	28	21	12	12	474
IDEA Weslaco Pike	158	69	74	64	64	49	62	70	49	30	23	18	9		739
San Antonio	2,004	2,176	1,317	1,160	1,164	1,098	1,058	1,641	779	582	450	311	149	57	13,946
IDEA Brackenridge	182	127	87	82	95			134	37	34					777
IDEA Burke	485	279	149					146							1,059
IDEA Carver		97	63	57	83	76	105	99	57	53	44	33	47	43	856
IDEA Eastside		202	108	87	106	133	167	127	102	80	86	106			1,303
IDEA Ewing Halsell	143	134	104	88	81			145	44	49					788
IDEA Ingram Hills	532	249	117	123				190	66						1,276
IDEA Judson		273	144	145	123	143	139	175	84	54	33				1,313
IDEA Mays		209	131	196	259	246	221	137	134	121	93				1,748
IDEA Monterrey Park		153	105	110	154	154	174	132	72	78	72	75	40		1,320
IDEA Najim	425	125	84	51	60	58		84	51	22	19				979
IDEA South Flores	237	167	123	125	117	207	163	164	73	56	70	53	33	14	1,602
IDEA Walzem		160	103	97	84	81	89	111	61	35	32	45	28		926
Tarrant County	464	294	227	245			55	220							1,503
IDEA Achieve	248	163	115	130			55	115							825
IDEA Rise	216	131	112	115				105							678
Upper Valley	1,773	1,029	1,091	825	748	768	714	937	540	447	357	314	190	83	9,815
IDEA Donna	123	46	48	40	52	52	61	43	25	29	17	23	11	5	574
IDEA Edinburg	146	123	112	83	86	97	94	52	40	35	30	24	21	7	949
IDEA Los Encinos	182	154	178					130							645
IDEA McAllen	181	95	89	117	109	140	110	77	73	51	64	46	39	19	1,210
IDEA Mission	120	47	68	45	57	44	50	47	41	28	36	28	43	16	670
IDEA North Mission	221	135	152	127	120	147	125	94	73	74	61	57			1,387
IDEA Owassa	130	94	76	69				96	32						498
IDEA Pharr	116	45	70	69	57	75	52	50	66	52	57	57	29	8	802
IDEA Quest	154	72	77	60	50	116	95	38	32	33	35	28	22	7	817
IDEA Rio Grande City	100	73	75	78	73	37	74	66	42	36					654
IDEA San Juan	103	56	55	54	64	59	53	72	31	39	37	36	11	10	679
IDEA Toros								19	16	13	20	15	14	11	108
IDEA Tres Lagos	197	90	91	84	80			153	71	56					821
District	5,889	5,733	4,417	3,705	3,168	2,798	2,767	4,654	2,289	1,521	1,236	960	494	218	39,848



IDEA Public Schools - HQ Main

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Weslaco, TX 78596

Phone 956-377-8000

December 12, 2019

Denise Carter, Acting Assistant Secretary for Finance and Operations
Frank Brogan, Assistant Secretary of Elementary and Secondary Education
U.S. Department of Education
400 Maryland Ave, SW
Washington, DC 20202

Dear Ms. Carter and Mr. Brogan,

IDEA Public Schools respectfully submits its response to the U.S. Department of Education Office of Inspector General audit titled, IDEA Public Schools' Administration of Grants for the Replication and Expansion of High-Quality Charter Schools, dated November 22, 2019 (ED-OIG/A05S0013). Enclosed in the following response, IDEA Public Schools provides detailed responses to each of the reports' findings including where we agree or disagree with the finding, and further explanations, evidence, and plans for how the District will move forward.

The mission of IDEA Public Schools is to prepare students from historically underserved communities to graduate from college. By every possible measure, we are accomplishing our mission. Over the last 20 years, IDEA has grown from a small after-school program in Donna, Texas to the fastest growing and highest achieving public charter school network in the country. This unprecedented growth and success has resulted in the creation of nearly 53,000 high-quality public school seats in historically underserved communities across Texas and Louisiana. IDEA Public Schools, which serves a student population that is 95% minority and 88% free or reduced-price lunch eligible, is one of the highest performing school districts in Texas and has sent over 99% of its graduates to college over the last 13 years.

While we are immensely proud of our success, we continually strive to strengthen our practice and improve our outcomes. Our students deserve no less. As such, we appreciate the opportunity to review the recommendations made by the U.S. Department of Education Office of Inspector General and look forward to working closely with the U.S. Department of Education Office of Elementary and Secondary Education to ensure that IDEA Public Schools continues to faithfully implement our federal CSP grant in accordance with our approved grant application and federal guidelines.

Sincerely,

A handwritten signature in black ink, appearing to read "Thomas Torkelson", with a long horizontal line extending to the right.

Thomas Torkelson
Founder & Chief Executive Officer
IDEA Public Schools

As provided for in the November 22, 2019, letter from the United States Department of Education Office of Inspector General, please accept the following comments in response to the report.

Findings- General

As provided for in the federal register announcing the Charter School Program Replication Grants, the primary purpose of the CSP is to expand the number of high-quality charter schools available to students across the Nation. Additionally, the US Department of Education has appropriately focused its efforts and resources on expanding the number of high-quality charter schools in low-income communities. IDEA Public Schools has significantly contributed towards this endeavor for the last decade, adding high performing schools serving students in poverty at an unprecedented growth rate.

IDEA has delivered on its promise to open 100% of the schools we committed to in our 2014, 2016, and 2017 CSP applications, on-time and within budget. In doing so, IDEA was able to move thousands of underserved students off wait lists and into high quality charter seats across multiple regions.

When the US Department of Education released its first CSP Replication grant in 2010, IDEA Public Schools had just 16 schools serving approximately 6,800 students. Today, IDEA operates 96 schools serving nearly 53,000 students. By 2022, IDEA will serve over 100,000 students across the Nation, graduating over 3,200 college-bound seniors.

While we appreciate and work diligently to comply with the technical reporting requirements of every grant we receive, it is important to keep sight of the central goal of the grant, which is to expand the number of high-quality charter schools for students in low-income communities. We are proud of the work we have done to achieve this goal.

Having said that, we also take seriously our commitment to complying with the technical reporting requirements associated with every grant we administer. We understand the need for strong quality controls and the necessity of accurate reporting.

Finding 1. Annual Performance Reports Were Incomplete or Inaccurate

IDEA Public Schools disagrees with this finding. IDEA Public Schools submitted each Annual Performance Report (APR) by the deadline established by the US Department of Education (USDE), and while the APRs did not include data for every measure, data was provided for each measure for which data was available at the time of the deadline.

Our CSP grants are focused on student-centered outcomes. As such, the majority of our performance measures are based on metrics that are measured and reported after the completion of the school year. The April deadline for the APRs precludes us from including those year-end measures. Additionally, the online grant reporting system used by USED offers sub-grantees no opportunity to revise and resubmit APRs when data becomes available.

IDEA clearly indicated in the APR that due to the deadline, data for a number of measures was not available. The APR template, which is created by USDE, provides subgrantees the option of submitting reports with incomplete data (see Form 524B, question 11) recognizing that the spring deadline for the report will necessarily result in incomplete data. IDEA clearly indicated on each of the three APRs that the report was being submitted without complete data.

The report also claims that IDEA submitted inaccurate data. To support this finding, OIG pointed to our 2016 APR, in which we reported that 20,970 of our 23,508 students had a low socioeconomic status, resulting in a rate of 89% (far surpassing our goal of 80%). However, OIG claims that data from the Texas Department of Education indicated that our total enrollment was 23,526 and not 23,508. Putting aside the fact that this represents a

difference of .07%, the finding fails to acknowledge that enrollment data is, by its very nature, fluid and will change depending on when the enrollment data is reported and captured. The 2016 APR was based on a reporting period through March 2016 (see Form 524B, #7). Therefore, IDEA included our enrollment at the time of the report. It is not surprising that the official end of year enrollment data reported by the Texas Department of Education would reflect a slightly different number.

To further bolster the claim that IDEA provided “inaccurate” information, OIG pointed to an alleged discrepancy in projected enrollment. The OIG report states that, “For the 2014 grant, IDEA Public Schools reported that its planned enrollment by 2017 was 28,694. However, IDEA Public Schools provided us records from the Texas Education Agency that showed its planned enrollment by 2017 was 29,335, not 28,694.”

It is important to point out that enrollment projections are just that- projections. Every school district in the country develops enrollment projections and it is a safe assumption that every school district in the country revises those projections over time as more information becomes available. In fact, school districts have a responsibility to update enrollment projections, and failure to do so would be viewed as gross incompetence. It is unclear why the OIG believes that IDEA’s actions in this regard are anything other than appropriate. As noted in the previous paragraph IDEA has exceeded its enrollment projections, providing more than six hundred additional students with access to its college preparatory program.

The OIG included a similarly flawed finding relating to student persistence data. It is important to understand that IDEA has developed a sophisticated web-based platform to report and track data. IDEA’s Locus Dashboard allows IDEA educators to focus on key student-centered indicators to empower their decision making by providing real-time access to a variety of metrics. One of the indicators reported and tracked through the Locus Dashboard is student persistence. Data is updated daily, allowing IDEA to see in real time whether schools, campuses and regions are on-track to meet their annual student persistence goals.

As explained above, metrics for which we had available data were reported using the currently reported data. It is entirely unsurprising that two snapshots of student persistence data taken at two different points in time would yield different results. As was required by the APR, we provided the data that was reflective of the reporting period as described on Form 524B.

While IDEA strongly disagrees with the finding that we reported inaccurate information, we do agree that our procedures can and will be strengthened by adopting clear procedures relating to data retrieval. As such, our team is currently working on a detailed policy to ensure that the timing and source of data used for APR reporting purposes is clearly defined and is consistently applied. We will work with our program officer at USED to submit policies and procedures for annual performance reporting.

Finding 2. IDEA Public Schools Did Not Always Charge Only Allowable and Adequately Documented Expenses to the Replication and Expansion Grants

IDEA has robust and comprehensive policies and procedures related to financial management and controls. IDEA has over \$1 billion in assets and an annual operating budget of over \$500 million. We have received the highest possible fiscal integrity rating from the Texas Department of Education for the last three years and recently earned an “A-” bond rating from S&P Global, the highest bond rating for any charter school in the country, partly due to IDEA’s “strategic financial practices, conservative modeling and flexibility despite an aggressive expansion planned over the next two years.”

IDEA is proud of the finding made by the OIG that 100% of the personnel expenses examined by the OIG were allowable and adequately documented. Of the more than \$39 million from the USDE, the OIG identified \$23,535 in expenses that IDEA was unable to provide adequate documentation to justify the expenditure. While this represents just .06% of the funds received, we take seriously our responsibility to account for every dollar of taxpayer funding we receive, and therefore agree to reimburse the USDE for these expenses. We will work with our program officer at USED to determine the most appropriate method to submit the reimbursement.

Conclusion

The mission of IDEA Public Schools is to prepare students from historically underserved communities to graduate from college. By every possible measure, we are accomplishing our mission. Over the last 20 years, IDEA has grown from a small after-school program in Donna, Texas to the fastest growing and highest achieving public charter school network in the country. This unprecedented growth and success has resulted in the creation of nearly 53,000 high-quality public school seats in historically underserved communities across Texas and Louisiana. IDEA Public Schools, which serves a student population that is 95% minority and 88% free or reduced-price lunch eligible, is one of the highest performing school districts in Texas and has sent over 99% of its graduates to college over the last 13 years.

While we are immensely proud of our success, we continually strive to strengthen our practice and improve our outcomes. Our students deserve no less. As a network of chartered public schools, IDEA Public Schools considers being a steward of public funds to be an honor and a privilege – one that we do not take lightly. We are committed to spending public dollars responsibly, compliantly, and in the service of students. As such, we appreciate the opportunity to review the recommendations made by the U.S. Department of Education Office of Inspector General and look forward to working closely with the U.S. Department of Education Office of Elementary and Secondary Education to ensure that IDEA Public Schools continues to faithfully implement our federal CSP grant in accordance with our approved grant application and federal guidelines.

CMO Corrective Action Plan (CAP)

Please review final monitoring report for full details.

Place "N/A" if indicator has the rating "Fully meets the indicator."

Indicator	Indicator Description	Rating	Area of Concern	Resolution Plan (including timeline)	Completion Notes	Confirmation of Completion (Y/N)
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Section 1
CHARTER SCHOOL STATUS AND APPLICATION FIDELITY

Indicator 1.1	DEFINITION OF CHARTER SCHOOL.	Fully meets the indicator	N/A	N/A	N/A	
Indicator 1.2	PROGRAM IMPLEMENTATION.	Fully meets the indicator	N/A	N/A	N/A	
Indicator 1.3	MANAGEMENT PLAN IMPLEMENTATION.	Largely meets the indicator	IDEA does not have a written plan or policy identifying the steps and procedures to close a school.	IDEA Public Schools has established and opened 96 public charter schools across Texas and Louisiana over the last 20 years. Over that time, IDEA has demonstrated remarkable academic and financial outcomes and has never closed a school. However, we understand and appreciate the importance of having a policy and procedure in place in the unlikely event that a school closure occurs. Currently, school closure processes and procedures are governed by our local charter contracts and applicable state law. The Fiduciary Board will adopt a school closure policy that governs practices across our network while still adhering to the applicable	IDEA fiduciary board will adopt a school closure policy by August 2020.	
Indicator 1.4	PARENT AND COMMUNITY INVOLVEMENT.	Fully meets the indicator	N/A	N/A	N/A	
Indicator 1.5	INFORMATION AND EQUAL ACCESS TO ATTEND.	Largely meets the indicator	Students are automatically enrolled throughout K-12, including when moving from elementary to middle and high school, preventing equal access to attend.	As stated in our response, IDEA disagrees with the interpretation relied upon for this finding. However, in an abundance of caution, IDEA has submitted a request for amendment to our approved project, consistent with the process provided for in the Dear Colleagues Letter-ESSA Flexibilities for CSP Grantees (Nov, 2017).	Request for Amendment Submitted April 9, 2020.	

Section 2
GRANTEE QUALITY AND PERFORMANCE ASSESSMENT

Indicator 2.1	REPLICATION OR EXPANSION SCHOOL QUALITY.	Fully meets the indicator	N/A	N/A	N/A	
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Indicator 2.2	ASSISTING EDUCATIONALLY DISADVANTAGED STUDENTS.	Largely meets the indicator	IDEA's current 5% rate of assistance for students with disabilities is half the State rate.	<p>The mission of IDEA Public Schools is to prepare students from historically underserved communities to be successful in college and citizenship. We are committed to serving all students, including students with disabilities. Students with disabilities are the fastest growing group of students enrolling in IDEA schools. Over the last year alone, our percentage of students with disabilities increased by 16.7%. As reported by the US Government Accountability Office (2012, GAO 12-543), there are a variety of reasons why families with children with disabilities may forgo enrolling in a public charter school.</p> <p>The evaluators identified no troubling practices implemented by IDEA, and in fact the evaluators noted IDEA's "robust special education program", our adherence to each student's IEP, our critical student intervention strategies, and our Life Skills classrooms for students with more intense needs. Additionally, IDEA Public schools intentionally and purposefully markets to students with disabilities (as evidenced by our website and marketing material). As the evaluators included no specific findings related to IDEA policies or practices, we will continue our efforts to ensure that students with disabilities have equal access to IDEA schools and will provide updated data to USED as it becomes available.</p>	No new activity required.	
Indicator 2.3	EVALUATION PLAN.	Fully meets the indicator	N/A		N/A	
Indicator 2.4	PERFORMANCE MEASUREMENT QUALITY.	Largely meets the indicator	Incomplete or missing data for performance measures.	<p>As communicated in our April 1, 2020 OIG response (attached), IDEA Public Schools submitted APRs with the data that was available at the time of the submission, which was our understanding of the expectations at the time. In response to guidance from USED, we have revised our practice to submit complete prior year data for all future APRs. Additionally, we revised previously submitted APRs to include complete data from the prior school year, and submitted the revised APRs to USED on April 1, 2020. Additionally, IDEA revised our APR policies and procedures to address this issue and ensure that future APRs are submitted with complete data from the prior year. Finally, IDEA revised its APR policies and procedures to ensure that all performance measures are clearly defined, including the source data used to calculate the measures.</p>	Past APR's revised and resubmitted on April 1. Revised policies and procedures revised and submitted on April 1. No additional action necessary.	
Section 3 ADMINISTRATIVE AND FISCAL RESPONSIBILITIES						
Indicator 3.1	FEDERAL PROGRAM FUNDING AND COORDINATION.	Fully meets the indicator	N/A	N/A	N/A	

CMO Corrective Action Plan (CAP)

Please review final monitoring report for full details.				Place "N/A" if indicator has the rating "Fully meets the indicator."		
Indicator	Indicator Description	Rating	Area of Concern	Resolution Plan (including timeline)	Completion Notes	Confirmation of Completion (Y/N)
Section 1						
CHARTER SCHOOL STATUS AND APPLICATION FIDELITY						
Indicator 1.1	DEFINITION OF CHARTER SCHOOL.	Fully meets the indicator	N/A	N/A	N/A	
Indicator 1.2	PROGRAM IMPLEMENTATION.	Fully meets the indicator	N/A	N/A	N/A	
Indicator 1.3	MANAGEMENT PLAN IMPLEMENTATION.	Largely meets the indicator	IDEA does not have a written plan or policy identifying the steps and procedures to close a school.	IDEA Public Schools has established and opened 96 public charter schools across Texas and Louisiana over the last 20 years. Over that time, IDEA has demonstrated remarkable academic and financial outcomes and has never closed a school. However, we understand and appreciate the importance of having a policy and procedure in place in the unlikely event that a school closure occurs. Currently, school closure processes and procedures are governed by our local charter contracts and applicable state law. The Fiduciary Board will adopt a school closure policy that governs practices across our network while still adhering to the applicable laws and regulations of each state	IDEA fiduciary board will adopt a school closure policy by August 2020.	
Indicator 1.4	PARENT AND COMMUNITY INVOLVEMENT.	Fully meets the indicator	N/A	N/A	N/A	
Indicator 1.5	INFORMATION AND EQUAL ACCESS TO ATTEND.	Fully meets the indicator	N/A	N/A	N/A	
Section 2						
GRANTEE QUALITY AND PERFORMANCE ASSESSMENT						
Indicator 2.1	REPLICATION OR EXPANSION SCHOOL QUALITY.	Largely meets the indicator	Suspension rates are disproportionate for students with disabilities. Also, IDEA did not provide requested retention rates showing that IDEA's rates exceed the state average.	According to the most recent data from the National Center for Education Statistics (NCES, 2014), the average suspension rate for all students in public schools was 5.3%, while the suspension rate at IDEA Public Schools was 1.83%. According to data from USED's Office of Civil Rights, the suspension rates for students with disabilities was 11.32% in traditional public schools and 11.85% in public charter schools. The suspension rate for students with disabilities in IDEA Public Schools was 3.86%, approximately 65% lower than the national average. While IDEA's suspension rates are significantly lower than the national average, we continue to work to identify and address the underlying causes of behaviors that lead to suspensions as well as the differences in suspension rates between different groups of students. As we indicated in our initial response to the evaluators, we have implemented additional training for teachers, and have revised our policies and procedures related to student discipline. Specifically, we've trained teachers and administrators on Response to Intervention, Functional Behavioral Assessment Training, Crisis Prevention Intervention, and Special Education Discipline and Due Process in addition to hiring social workers at our highest need campuses. We will continue these strategies and evaluate new data as it become available. The issue regarding "retention rates" appears to be a miscommunication relating to the term "retention". The evaluators used the term retention as it relates to students remaining enrolled at the school (IDEA refers to this as persistence), while IDEA understood retention to refer to students being retaining at a grade level due to academic performance. IDEA reports student persistence in each APR and can provide student persistence rates at the school, campus, region or district level upon request.	Complete. No additional action necessary.	
Indicator 2.2	ASSISTING EDUCATIONALLY DISADVANTAGED STUDENTS.	Fully meets the indicator	N/A	N/A	N/A	
Indicator 2.3	EVALUATION PLAN.	Fully meets the indicator	N/A	N/A	N/A	

Indicator 2.4	PERFORMANCE MEASUREMENT QUALITY.	Largely meets the indicator	No evidence of prior approval from ED could be found to authorize changes to performance measures in the APR, which were different than wording in the application. Not all data was included in APR to address performance measures.	As communicated in our April 1, 2020 OIG response (attached), IDEA Public Schools submitted APRs with the data that was available at the time of the submission, which was our understanding of the expectations at the time. In response to guidance from USED, we have revised our practice to submit complete prior year data for all future APRs. Additionally, we revised previously submitted APRs to include complete data from the prior school year, and submitted the revised APRs to USED on April 1, 2020. Additionally, IDEA revised our APR policies and procedures to address this issue and ensure that future APRs are submitted with complete data from the prior year. Finally, IDEA revised its APR policies and procedures to ensure that all performance measures are clearly defined, including the source data used to calculate the measures.	Past APR's revised and resubmitted on April 1. Revised policies and procedures revised and submitted on April 1. No additional action necessary.	
Section 3 ADMINISTRATIVE AND FISCAL RESPONSIBILITIES						
Indicator 3.1	FEDERAL PROGRAM FUNDING AND COORDINATION.	Fully meets the indicator	N/A	N/A	N/A	
Indicator 3.2	USE OF GRANT FUNDS.	Does not meet the indicator	Expenditures were below proposed amounts or not implemented. Insufficient information was provided to understand how funds were spent and if the costs are allowable. Also, funds were used with another CSP grant to expand the same school.	Monitors noted that IDEA had either not spent or underspent in hiring and compensation in the planning period and contractual services. The identified expenditures in these budget categories were for a Relay Founding Teacher Fellowship, community engagement, and other contractual items. IDEA conducted these activities to support the project but was unable to allocate them to CSP due to federal procurement requirements. Since an RFP had not been conducted at the time, IDEA determined that these expenses were ineligible. IDEA has since revised its grant management guidelines to ensure that all procurement above the simplified acquisition threshold complies with 2 CFR § 200.320(d). Furthermore, all grant managers receive an annual procurement training including an overview of the competitive bid process. Additionally, monitors cited IDEA for including South Flores College Prep in both the FY16 and FY17 CSP grant for expansion. IDEA disagrees with this interpretation. As stated in the FY16 and FY17 notices inviting applications in the Federal Register, "A charter school that has received CSP funds for replication or expansion previously, or that has received funds for planning or initial implementation of a charter school (i.e., CFDA 84.282A or 84.282B), may not use funds under this grant for the same purpose. However, such charter school may be eligible to receive funds under this competition to substantially expand the charter school beyond the existing grade levels or student count." South Flores CP is included in U282M10009 for 9th grade expansion in 2016-2017 and the U282M170025 grant for grades 10-12 in 2017-2020. South Flores CP did not exceed the per student limitation or the per campus maximum allotment.	Contact program officer to confirm eligible community engagement expenses and to determine if detailed expense reports are requested by April 30, 2020. No further action required.	
Indicator 3.3	FISCAL CONTROL AND ACCOUNTING.	Largely meets the indicator	No plan is in place for disposition of assets. Also, there were audit findings regarding internal controls leading to a corrective action plan being in place.	IDEA will address the plan for disposition of assets in its school closure policy. While the 2017 audit did include material weaknesses related to the organization's financial statements, the audit confirmed that there were no material weaknesses related to federal funds management. However, IDEA treats any material weakness seriously and immediately began implementing corrective action. In response to the material weaknesses identified, IDEA provided key policies to the board for approval and legal review, removed all exemptions for penalties for senior leadership for not following policies and procedures, adopted a centralized booking system for all travel and an AmEx corporate credit card reimbursement program including review of senior leadership expenses, revised our purchasing policy, and engaged legal counsel to ensure compensation is properly reported. As a result of implementing these corrective action items, IDEA's 2018 audit reflected these same findings had been downgraded to significant deficiencies. The audit notes that "IDEA Public Schools, Inc. (the School) implemented significant new policies during the fiscal year ended June 30, 2019 to address exceptions observed in the current audit and in response to prior year audit findings. The items noted by the auditor were incurred prior to the implementation of the new policies. The School will continue to monitor and strictly enforce the policies implemented in an effort to improve internal controls." These items were downgraded instead of removed since IDEA wasn't informed of the prior year audit results until several months into the new fiscal year. Lastly, monitors noted findings from a 2017 internal audit. IDEA routinely conducts internal audits to proactively identify any issues or potential issues. These reports are provided to the external auditors. As reflected in the 2017 audit, all items had been corrected.	IDEA fiduciary board will adopt a school closure policy by August 2020.	

Indicator 3.4	RECORDS MANAGEMENT.	Largely meets the indicator	IDEA was unable to provide timely financial information to reviewers, sometimes delayed by months.	IDEA was engaged in two WestEd monitoring reviews and the external Single Audit during the same time period. This required fielding multiple document requests and follow-up questions from each team . IDEA believes that any missed communications were purely accidental.	Hire a full-time CSP Project Director within the timeframe required by the GAN.	
Notes:						



Exhibit C

IDEA HEADQUARTERS
2115 W. Pike Blvd.
Weslaco, TX 78596

April 14, 2020

To Whom It May Concern:

I am writing to request Penalty Interest be waived for my entity. Several of our accounts have been sitting with a **negative** balance due to previous deposits mistakenly being paid to the incorrect account. Specifically, our FG - RE Federal Fund Private Grant Contribution (balance of **-\$678,306.87** on 03/01/2020) and NM – RE New Member Contribution (balance of **-\$352,549.41** on 03/01/2020) accounts have been affected.

One such payment occurred on 04/24/2019. The payment seen below for \$831,022.80, was incorrectly paid into our FI - RE Federal Fund/Private Grant Care account instead of in our FG - RE Federal Fund Private Grant Contribution account. This has caused our FI ledger to carry a positive balance and our FG account a negative balance. Since this error was discovered, my employer has been working to get ledger balances to zero by conducting internal transfers and adjusting monthly payment amounts (TEXNET).

Posted Date	Type	Transaction Description	Posted Amount	Reporting Period	Deposit Date/Receivable Date	RE Ledger Balance
04/24/2019	FI	TexNet - Federal Insurance Amount Due	\$831,022.80	04/2019	04/24/2019	\$719,652.33
04/08/2019	FI	Transfer In	\$9,630.00	02/2019	03/07/2019	-\$111,370.47

Below is a summary of our account balances on 03/01/2020:

TRS Account	RE Ledger Balance
Total Eligible Compensation	N/A
Total Gross Compensation	N/A
Total Member Contribution	\$858,053.69
Total Member TRS-Care Contribution	\$87,640.97
Total RE TRS-Care Contribution	\$93,102.19
Total Federal TRS-Care Contribution	\$728,421.16
Total Service Credit Purchase Deduction	\$8,736.30
Eligible Compensation Paid From Federal Funds/ Private Grants	N/A
Federal Funds/ Private Grant Contribution	(\$678,306.87)
State Minimum Compensation	N/A
Statutory Minimum Contribution	\$525.95
RE Payment for New Member Contribution	(\$352,549.41)
RE Payment for Public Education Employer Contribution	(\$15.30)

Please let me know if you have any questions or if more information is required in order to have penalty interest for our FG and NM accounts waived.

Respectfully,

Stephanie Maldonado
TRS Reporting Official
IDEA Public Schools #2184
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August 21, 2020

To Whom It May Concern:

I am writing to request Penalty Interest in the amount of \$278,067.80 be waived for IDEA Public Schools (RE# 2184). Penalty and interest accrued from April 23, 2018 through April 27, 2020 due to shortages in the accounts reflected below in addition to late submissions of payroll reports, not payments to TRS.

Account	Penalty Interest
FG – Federal Funds/Private Grant Contribution	(\$77,497.02)
MC – Member Contribution	(\$155,041.87)
NM – New Member Contribution	(\$44,547.35)
NO – Public Education Employer Contribution	(\$965.03)
PS – Pension Surcharge	(\$16.53)
Total	(\$278,067.80)

Shortages in these accounts resulted after timely remitted payments to TRS were posted to incorrect accounts. One such payment occurred on April 24, 2019 in the amount of \$831,022.80, however was reported into our FI - RE Federal Fund/Private Grant Care account instead of in our FG - RE Federal Fund Private Grant Contribution account (see below).

Posted Date	Type	Transaction Description	Posted Amount	Reporting Period	Deposit Date/Receivable Date	RE Ledger Balance
4/24/2019	FI	TexNet - Federal Insurance Amount Due	\$831,022.80	04/2019	4/24/2019	\$719,652.33
4/24/2019	FG	TexNet - Federal Fund and Private Grant Contribution	\$478,213.49	04/2019	4/24/2019	(\$752,763.47)

This caused our FI ledger to carry a positive balance of \$719,652.33 and our FG account a negative balance of (\$752,763.47) causing penalty interest to accumulate for FG from April 2019 through April 2020. This error was corrected by IDEA with the TEXNET deposit that posted on March 4, 2020 (see below). Positive interest from our FI account should cancel out negative interest from our FG account.

Posted Date	Type	Transaction Description	Posted Amount	Reporting Period	Deposit Date/Receivable Date	RE Ledger Balance
3/4/2020	FG	TexNet - Federal Fund and Private Grant Contribution	\$829,609.73	02/2020	3/4/2020	\$0.00

On April 27, 2020, \$145,106.99 in penalty interest for Member Contributions posted to our account. This was the result of the TRS system generating interest after a payroll report from September 2017 and August 2018 was processed. Payment for both reports was remitted to our Member Contribution account in a timely manner as is reflected by our MC ledgers, which carried a positive balance of at least \$630,000 from October 2017 through April 2020 after TXNET payment for the month was posted (see below).

Posted Date	Type	Transaction Description	Posted Amount	Reporting Period	Deposit Date/Receivable Date	RE Ledger Balance
08/09/2018	MC	Member Contribution	-\$6,946.05	10/2017	08/09/2018	\$682,178.56
08/09/2018	MC	Member Contribution	-\$11,510.96	09/2017	08/09/2018	\$698,180.66
08/09/2018	MC	Member Contribution	-\$1,306,435.50	07/2018	08/06/2018	\$709,691.62
08/07/2018	MC	TexNet - Member Retirement Contribution - Regular PR	\$1,326,456.28	08/2018	08/07/2018	\$2,016,127.12
07/12/2018	MC	Member Contribution	-\$1,185,197.49	06/2018	07/11/2018	\$689,670.84
07/03/2018	MC	TexNet - Member Retirement Contribution - Regular PR	\$1,188,841.18	06/2018	07/03/2018	\$1,874,868.33
06/07/2018	MC	TexNet - Member Retirement Contribution - Regular PR	\$1,260,566.32	05/2018	06/07/2018	\$686,027.15
06/04/2018	MC	Member Contribution	-\$1,268,500.25	05/2018	06/04/2018	-\$574,539.17
05/07/2018	MC	TexNet - Member Retirement Contribution - Regular PR	\$1,154,228.79	04/2018	05/07/2018	\$693,961.08
05/07/2018	MC	Member Contribution	-\$1,149,845.84	04/2018	05/07/2018	-\$460,267.71
05/01/2018	MC	Member Contribution	-\$1,207,789.07	03/2018	05/01/2018	\$689,578.13
04/26/2018	MC	Member Contribution	-\$1,128,870.22	02/2018	04/26/2018	\$1,897,367.20
04/25/2018	MC	Member Contribution	-\$1,082,994.24	01/2018	04/25/2018	\$3,026,237.42
04/23/2018	MC	Member Contribution	-\$1,153,810.85	09/2017	04/23/2018	\$4,109,231.66
04/19/2018	MC	Member Contribution	-\$1,214,815.89	12/2017	04/19/2018	\$5,263,042.51
04/16/2018	MC	Member Contribution	-\$1,122,529.77	11/2017	04/16/2018	\$6,477,858.40
04/09/2018	MC	TexNet - Member Retirement Contribution - Regular PR	\$1,213,230.65	03/2018	04/09/2018	\$7,600,388.17
04/09/2018	MC	Member Contribution	-\$1,116,490.71	10/2017	04/09/2018	\$6,387,157.52
03/07/2018	MC	TexNet - Member Retirement Contribution - Regular PR	\$1,137,493.06	02/2018	03/07/2018	\$7,503,648.23
02/07/2018	MC	TexNet - Member Retirement Contribution - Regular PR	\$1,090,528.23	01/2018	02/07/2018	\$6,366,155.17
02/06/2018	MC	Member Contribution	-\$88.96	09/2017	02/06/2018	\$5,275,626.94
12/29/2017	MC	TexNet - Member Retirement Contribution - Regular PR	\$1,214,901.21	12/2017	12/29/2017	\$5,275,715.90
12/07/2017	MC	TexNet - Member Retirement Contribution - Regular PR	\$1,125,883.57	11/2017	12/07/2017	\$4,060,814.69
11/07/2017	MC	TexNet - Member Retirement Contribution - Regular PR	\$1,160,772.81	10/2017	11/07/2017	\$2,934,931.12
10/10/2017	MC	TexNet - Member Retirement Contribution - Regular PR	\$1,753,989.14	09/2017	10/10/2017	\$1,774,158.31

Since all TEXNET payments were submitted to TRS in a timely manner, IDEA has determined and provided sufficient rationale that a waiver of the TRS penalty interest accrued since April 2018 should be approved. We are asking TRS to review the facts presented above in consideration of this waiver.

Please let me know if you have any questions or if more information is required.

Respectfully,



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ATTORNEYS AND COUNSELORS FOR TEXAS PUBLIC SCHOOLS AND LOCAL GOVERNMENT



WHITE PAPER PREPARED FOR IDEA PUBLIC SCHOOLS

DISCLOSURE OF BUSINESS RELATIONSHIPS AND ARRANGEMENTS PERTINENT TO IMPLEMENTATION OF CHARTER SCHOOL PROGRAM GRANT FOR REPLICATION AND EXPANSION OF HIGH-QUALITY CHARTER SCHOOLS AS WELL AS SUPPORT FOR OTHER FEDERAL GRANTS AND PRIVATE PHILANTHROPY

Originally Issued on February 20, 2017
Updated on June 7, 2017,
Most Recent Update June 11, 2020

Abstract

At their inception, Texas open-enrollment charter schools (charter schools) enjoyed an environment relatively free of regulatory oversight. However, as a result of various events, the Texas legislative and executive branches of government have dramatically increased the regulatory requirements and compliance demands placed on charter schools. For example, in an effort to begin regulating certain activities, the 77th Texas Legislature passed House Bill 6 which applied existing school district legal requirements to charter schools relating to conflicts of interest. In 2013, the U.S. Office of Management and Budget (OMB) adopted administrative laws concerning conflicts of interest in its Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards codified as Part 200 to Title 2 of the Code of Federal Regulations (2 CFR 200). Subsequently, in 2014, the U.S. Department of Education (USDE) adopted the same and other clarifying regulations in its Education Department General Administrative Regulations (EDGAR). On September 29, 2016, the USDE Office of Inspector General (OIG) issued a Final Audit Report entitled “Nationwide Assessment of Charter and Education Management Organizations” (Control Number ED-OIG/A02M0012) in which the OIG disclosed a significant concern relating to the business arrangements between charter management organizations (CMOs) and their charter school subsidiaries, affiliates and clients of CMOs (regardless of how structured or classified). Recently, the 86th Texas Legislature passed Senate Bill 1454 to address, in part, related party transactions. Also, on November 22, 2019, the OIG issued a Final Audit Report entitled “IDEA Public Schools’ Administration of Grants for the Replication and Expansion of High-Quality Charter Schools” (Control Number ED-OIG/A05S0013) in which the OIG identified issues, that have since been addressed and resolved, relating to IDEA Public Schools’ (IDEA) annual performance report submissions and documentation for and use of Charter School Program (CSP) grant funds.

The matters disclosed above may impact various grant awards and funding decisions. In the interest of transparency and clarity, this white paper discloses IDEA’s related party business affiliations and arrangements pertinent to its continued receipt and use of various grant funds.

1. BACKGROUND

1.1. State CMO Regulation

Before their inception, charter schools were proposed as a solution to ongoing concerns about public education and some, unlike IDEA, have yielded mixed results. Beginning in the early 2000s, the Texas Legislature and the Texas Education Agency (TEA) adopted laws and rules to increase regulation of charter schools, notably focusing on arrangements and transactions involving public funds and public property. One particular area of interest was charter school business arrangements and transactions with related, interested or conflicted parties, with special emphasis on management companies.¹

The Texas Legislature and TEA adopted laws and rules regulating the use of public funds and public property, charter school records, interested and related party transactions, conflicts of interest, management company contracts and arm's length transactions. It is important to note that the change in laws resulted, in part, from observed abuses by management companies of their charter school clients and of the public funds, public property and government records entrusted to them. Specifically, several out of state "education management companies" formed Texas nonprofit corporations, including appointing conflicted individuals to their respective board of directors. Through these entities and their conflicted boards, the management companies applied for, received and operated open-enrollment charters. A key element of their operation of their Texas charters were management services contracts that focused upon back office operations and lucrative fee arrangements based upon a percentage of state revenues, in addition to facility lease revenues and cost reimbursements. Through these contracts, management companies also controlled and retained their charter school clients' records, an act that subsequently proved to be detrimental to the charter holders. After several charter school failures and soured business arrangements pertaining to management company contractual arrangements, TEA observed that the issues noted above were possible because of the conflicted nature of the business arrangements between the management companies and the charter holder board of directors.

While not applicable to IDEA's management of charter schools in states aside from Texas, the results of the above is that Texas will not allow any cross-over between Texas charter management companies and Texas charter holders. Any owner, board member, officer or director of a management company or employee of a management company is barred from being employed by or on the board of a Texas charter school/charter holder. They must be wholly separate entities. Due to these restrictions, IDEA as a Texas charter holder, does not operate through or with a management company. However, in order to assure a successful replication of its model in other states, an appropriate CMO structure will be utilized as described below.

¹ In Texas law, the phrase *management company* is analogous to *CMO*.

1.2. Federal CMO Regulation

The Federal government has long had regulations addressing conflicts of interest. In 2014, the OMB and USDE nonetheless adopted requirements pertaining to organizational conflicts of interest. Principally, we observe the following rule at 2 CFR §200.318(c)(2):

If the non-Federal entity has a parent, affiliate, or subsidiary organization that is not a state, local government, or Indian tribe, the non-Federal entity must also maintain written standards of conduct covering organizational conflicts of interest. Organizational conflicts of interest means that because of relationships with a parent company, affiliate, or subsidiary organization, the non-Federal entity is unable or appears to be unable to be impartial in conducting a procurement action involving a related organization.

As disclosed further below, IDEA has developed appropriate policy and procedural safeguards addressing organizational conflicts of interest as it has formed and is establishing its network of charter schools outside of Texas.

1.3. Formation of Affiliates

In 2016, 2017 and 2019, IDEA established certain legal entities to facilitate the expansion and replication of its successful charter program while also seeking to provide liability protections to secure its core business in IDEA and Texas charter schools. Namely, IDEA filed articles of formation with the respective Texas Secretary of State, Louisiana Secretary of State and Florida Department of State to organize and start-up the following companies and corporation.

IDEA Public Schools USA, L.L.C. (“IDEA USA”)
IDEA Public Schools Louisiana, Inc. (“IDEA LA”)
IPS Enterprises, Inc. (“IPS”)²
IDEA Public Schools NOLA, Inc. (“IDEA NOLA”)
IDEA Florida, Inc. (“IDEA Florida”)

Although each organization constitutes a separate legal entity and operates as such, all of these business enterprises are affiliated with IDEA and IPS specifically has overlapping board members and IDEA serves as its sole corporate member. We discuss these entities and their relationships further below. In addition to the above named entities, similar corporate structures will be utilized in other states where IDEA is expanding.

² On October 10, 2019, IDEA filed a Certificate of Conversion of a Limited Liability Company Converting to a Corporation and a Certificate of Formation Nonprofit Corporation with the Texas Secretary of State. Through this filing, IDEA effectively converted IPS from a limited liability company to a nonprofit corporation.

1.4. Baton Rouge Charters

In March 2016, IDEA filed, through IDEA LA, an application for a Type I Charter to operate four charter schools in Baton Rouge, Louisiana starting in the 2017-2018 school year. The East Baton Rouge Parish School Board subsequently awarded the charter to IDEA LA in May 2016.

With the USDE publishing the notice identified below, IDEA realized that it might be able to leverage CSP funds to begin and replicate its successful charter school model in its Louisiana charters.

1.5. USDE Grant Opportunity

In May 2016, USDE published a notice in the Federal Register (May 10, 2016, volume 81, page 28837) soliciting applications for CSP Grants for Replication and Expansion of High-Quality Charter Schools. USDE's grant "program [was] a competitive grant program designed to assist non-profit charter management organizations, and other entities that are not for-profit entities, in replicating or expanding high-quality charter schools with demonstrated records of success."³ In June 2016, IDEA submitted its grant application to USDE for an award to be funded through the CSP grant program. In its application, IDEA represented that it would "use CSP funding to...embark on its first replication in a high-need region outside of Texas (Southeast Louisiana, beginning with Baton Rouge)." The above grant application evidences that IDEA realized and intended that it might be able to utilize CSP funds to replicate its charter program through the Type I Charters awarded to IDEA LA by the East Baton Rouge Parish School Board. In September 2016, USDE issued its GAN to IDEA.

Importantly, at the time of its application, IDEA had not yet fully developed its CMO arrangement with IDEA LA, particularly the details of how this arrangement would be structured, which were still being worked out and formed.

1.6. New Orleans Charters

In March 2016, IDEA filed, through IDEA NOLA, an application for a Type I Charter to operate a charter school in New Orleans, Louisiana starting in the 2019-2020 school year. The Orleans Parish School Board subsequently awarded the charter to IDEA NOLA in May 2017.

1.7. Florida Charters

In March 2018, the Florida State Board of Education designated IDEA as a School of Hope operator, which authorized IDEA "to enter into a performance-based agreement with a school district to establish, open and operate a public charter school(s) to serve students from persistently low-performing public schools."⁴ In May 2019, the Hillsborough County School Board approved IDEA's application, filed through IDEA Florida, to operate four charter schools in Tampa Bay,

³ <http://www2.ed.gov/programs/charter-rehqcs/2016archive.html>

⁴ <http://www.fldoe.org/core/fileparse.php/18600/urlt/HopeOperator.pdf>

Florida. In February 2020, IDEA notified Duval County Public Schools of its intent, through IDEA Florida, to operate a charter school in Jacksonville, Florida starting in the 2022-2023 school year.

1.8. IPS Enterprises

Although IDEA originally intended to directly provide charter management services to the charter schools operated in other states, IDEA has since reconsidered this initial plan based on requirements of various states' laws. Instead, upon the formation of IPS, IPS has entered into CMO and other related agreements with IDEA LA, IDEA NOLA and IDEA Florida for the operation of their charter schools.

2. OIG AUDIT FINDINGS

Important to our discussion in this White Paper are two reports issued by the OIG, which we discuss further below.

2.1. CMO Risk

On September 29, 2016, the OIG issued a report entitled “Nationwide Assessment of Charter and Education Management Organizations.”⁵ In light of the various, relevant issues raised by the OIG in its report, we discuss key disclosures in detail below.

In its report the OIG concluded, and USDE agreed, that “charter school relationships with CMOs posed a significant risk” to federally funded education programs. Importantly, the OIG observed several “examples of internal control weaknesses related to the charter schools’ relationships with their CMOs (concerning conflicts of interest, related-party transactions, and insufficient segregation of duties).” Specifically, the OIG “noted weaknesses in the operating controls of charter schools that provided opportunities for key charter school personnel, charter school board members, and the CMO to have conflicts of interest.” Additionally, the OIG “identified relationships between the charter school board members and CMOs, as well as relationships between charter schools and CMO-affiliated vendors, that may put Federal, state and local funds at risk of misuse.”

Significant to our discussion, the OIG observed that several charters “had charter school governing board members that were fully or partially appointed by the contracted CMO or were the same board members as the contracted CMO’s board members.” Moreover, the OIG noted that “charter school boards ced[ed] substantial fiscal authority to CMOs in their management contracts” including “Decision-making authority granted to the CMO over charter school operations” and “CMO authority to select charter school board members or control charter school bank accounts,

⁵ In its report, the OIG referred “to both CMOs and education management organizations as CMOs” and “defined a CMO as any organization that operated or managed one or more charter schools, whether under contract or as charter holders, without regard to the profit motive of the organization.” The OIG further stated that education management organizations “are considered to be organizations that provide “whole-school operation” services.” For purposes of this white paper, we adopted the same convention as the OIG.

which included the ability to write checks on behalf of the charter school boards without obtaining board approval.” As a result, the OIG stated that, “while charter school boards may have approved an initial budget, CMOs were able to make expenditure decisions without prior approval from the charter school board.” For the OIG, this meant that “The charter school boards that delegated their authority could not fully exercise some of their duties as recipients of Federal and other public funds, including overseeing and administering those funds.” Lastly, the OIG “questioned the school board’s ability to fully exercise its programmatic control” in an instance where the CMO “had complete authority to make personnel decisions for a charter school.”

Based upon its various observations, the OIG asserted that the identified internal control weaknesses increased financial risk,⁶ the risk that accountability over Federal funds will be lacking,⁷ and performance risk.⁸ To mitigate these risks, the OIG observed that it was essential for charter holders to develop, implement and maintain a system of internal controls as “a means of identifying and managing risks associated with Federal programs and a key component in preventing and detecting fraud, waste, and abuse.” The OIG further observed that “The development and implementation of adequate internal controls is even more important when dealing with emerging operating environments, such as the CMOs that were the focus of this audit.”

To further its argument, the OIG observed the following rule codified at 2 CFR §200.303 and in EDGAR:

The non-Federal entity must:

(a) Establish and maintain effective internal control over the Federal award that provides reasonable assurance that the non-Federal entity is managing the Federal award in compliance with Federal statutes, regulations, and the terms and conditions of the Federal award. These internal controls should be in compliance with guidance in “Standards for Internal Control in the Federal Government” issued by the Comptroller General of the United States or the “Internal Control Integrated Framework”, issued by the Committee of Sponsoring Organizations of the Treadway Commission (COSO).

⁶ The OIG defined financial risk as “the risk of waste, fraud, and abuse resulting from conflicts of interest, related-party transactions, and insufficient segregation of duties.”

⁷ The OIG defined the risk that accountability over Federal funds will be lacking as “the risk that, as a result of charter school boards ceding fiscal authority to CMOs, charter school stakeholders (the authorizer, State educational agency (SEA), and Department) may not have accountability over Federal funds sufficient to ensure compliance with Federal requirements. As a result, the CMO may spend Federal funds on expenditures that are not in accordance with Federal law, regulation, and grant requirements.”

⁸ The OIG defined performance risk as “the risk that, as a result of charter school board ceding operational authority to CMOs, charter school stakeholders may not have sufficient assurance that grantees and subgrantees are implementing Federal programs in accordance with Federal requirements. As a result, the CMO may not provide charter school students with services that are in accordance with Federal program requirements.”

Importantly, in this regard, the OIG observed:

The GAO Green Book states that as programs change and entities strive to improve operational processes and implement new technology, management must continually evaluate its internal control system to ensure that it is effective and updated when necessary. Further, according to Office of Management and Budget (OMB) Circular A-123 §II.B, an organization's management should identify internal and external risks that may prevent the organization from meeting its objectives. Therefore, when identifying risks, management should take into account relevant interactions within the organization as well as interactions outside the organizations. Charter school relationships with CMOs are relevant interactions that should be considered when evaluating internal controls.

To further complicate the regulatory environment concerning organizational conflicts of interest, the OIG referenced additional requirements and guidance promulgated in 2 CFR 200 and other authoritative literature (e.g., Federal Acquisition Regulation) and by the American Institute of Certified Public Accountants concerning conflicts of interest, related-party transactions and segregation of duties "applicable to charter school relationships with CMOs." Specifically, in its report, the OIG identified certain "factors in determining whether charter schools are independent of for-profit CMOs contracted to provide services." To be clear, IDEA's CMO structure for out-of-Texas expansion is through IPS as a non-profit CMO. We nevertheless address the standards and factors as set forth in the OIG's report, as follows:

- (a) Whether the charter school's governing board is selected by, or includes members who are employees of, the for-profit CMO;
- (b) Whether the charter school has an independent attorney, accountant, and audit firm that works for the charter school and not for the for-profit CMO;
- (c) Whether the contract between the charter school and the for-profit CMO was negotiated at "arm's length," clearly describes each party's rights and responsibilities, and specifies reasonable and feasible terms under which either party may terminate the contract (for example, the charter school does not lose the right to use facilities);
- (d) Whether the fee paid by the charter school to the for-profit CMO is reasonable for the type of management services provided; and,
- (e) Whether any other agreements (such as loans and leases) between the charter school and for-profit CMO are fair and reasonable, documented appropriately, align with market rates, and include terms that will not change if the management contract is terminated.

In addition to conflict of interest requirements, the OIG also identified the following rule, found at 2 CFR §200.318, as pertinent to the relationship between a charter holder and its CMO:

*White Paper Prepared for IDEA Public Schools
Disclosure of Business Relationships and Arrangements Pertinent to Implementation of
Charter School Program Grant for Replication and Expansion of High-Quality Charter Schools
as well as Support for Other Federal Grants and Private Philanthropy*

(c)(1) The non-Federal entity must maintain written standards of conduct covering conflicts of interest and governing the actions of its employees engaged in the selection, award and administration of contracts. No employee, officer, or agent may participate in the selection, award, or administration of a contract supported by a Federal award if he or she has a real or apparent conflict of interest. Such a conflict of interest would arise when the employee, officer, or agent, any member of his or her immediate family, his or her partner, or an organization which employs or is about to employ any of the parties indicated herein, has a financial or other interest in or a tangible personal benefit from a firm considered for a contract. The officers, employees, and agents of the non-Federal entity may neither solicit nor accept gratuities, favors, or anything of monetary value from contractors or parties to subcontracts. However, non-Federal entities may set standards for situations in which the financial interest is not substantial or the gift is an unsolicited item of nominal value. The standards of conduct must provide for disciplinary actions to be applied for violations of such standards by officers, employees, or agents of the non-Federal entity.

(2) If the non-Federal entity has a parent, affiliate, or subsidiary organization that is not a state, local government, or Indian tribe, the non-Federal entity must also maintain written standards of conduct covering organizational conflicts of interest. Organizational conflicts of interest means that because of relationships with a parent company, affiliate, or subsidiary organization, the non-Federal entity is unable or appears to be unable to be impartial in conducting a procurement action involving a related organization.

Lastly, OIG cited the following rule, codified at 2 CFR §200.323 as relevant to the charter school-CMO arrangement:

(a) The non-Federal entity must perform a cost or price analysis in connection with every procurement action in excess of the Simplified Acquisition Threshold including contract modifications. The method and degree of analysis is dependent on the facts surrounding the particular procurement situation, but as a starting point, the non-Federal entity must make independent estimates before receiving bids or proposals.

(b) The non-Federal entity must negotiate profit as a separate element of the price for each contract in which there is no price competition and in all cases where cost analysis is performed. To establish a fair and reasonable profit, consideration must be given to the complexity of the work to be performed, the risk borne by the contractor, the contractor's investment, the amount of subcontracting, the quality of its record of past performance, and industry profit rates in the surrounding geographical area for similar work.

(c) Costs or prices based on estimated costs for contracts under the Federal award are allowable only to the extent that costs incurred or cost estimates included in negotiated prices would be allowable for the non-Federal entity under Subpart E—Cost Principles of this part. The non-Federal entity may reference its own cost principles that comply with the Federal cost principles.

(d) The cost plus a percentage of cost and percentage of construction cost methods of contracting must not be used.

2.2. Audit of IDEA's Administration of CSP Grants

On November 22, 2019, the OIG issued a report entitled “IDEA Public Schools’ Administration of Grants for the Replication and Expansion of High-Quality Charter Schools.” Given that this White Paper was originally written in regard to IDEA’s receipt of CSP grant funds, we note that the OIG disclosed the following pertinent matters.

Despite certifying that annual performance reports were true, complete, and accurate, IDEA Public Schools did not include complete and accurate information for all performance measures on which it was required to report in its 2016, 2017, and 2018 annual performance reports. We found that IDEA Public Schools did not report any information for 61 (84 percent) of the 73 performance measures on which it was required to report in the 2016 and 2017 annual performance reports. In September 2018, we informed IDEA Public Schools officials of the missing information for the 61 performance measures. IDEA Public Schools agreed that it did not provide the required information to the Department. The vice president of financial planning for IDEA Public Schools stated that some information required to be reported in annual performance reports is not available in April and must be submitted later in the fall, via email, to the Department. However, IDEA Public Schools did not provide us with records showing that it sent the information for the 61 performance measures to the Department in the fall. In October 2018, IDEA Public Schools submitted to the Department its 2018 annual performance report, which included all but 2 (8 percent) of the 23 performance measures on which IDEA Public Schools was required to report. We also found that IDEA Public Schools did not retain records that supported the information for 5 of the 11 performance measures on which it reported in its 2016, 2017, and 2018 annual performance reports and were included in our sample of performance measures.²

As a result of the incomplete and inaccurate reporting, the Department might not have had the information it needed to determine whether IDEA Public Schools was (1) making substantial progress in meeting the performance goals for each Replication and Expansion grant and (2) eligible for continuation awards.

...

*White Paper Prepared for IDEA Public Schools
Disclosure of Business Relationships and Arrangements Pertinent to Implementation of
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as well as Support for Other Federal Grants and Private Philanthropy*

We also found that IDEA Public Schools did not always spend grant funds in accordance with Federal cost principles and its approved grant applications. Specifically, of the \$1,002,406 worth of expenses that we examined, IDEA Public Schools charged \$13,800 (1.4 percent) in unallowable expenses and did not adequately document \$9,735 (1.0 percent) in expenses that it charged to the three grants from July 1, 2017, through June 30, 2018.³ Although IDEA Public Schools had written policies and procedures in place for approving purchases and documenting the use of grant funds, it did not have processes in place to provide reasonable assurance that employees consistently adhered to those policies and procedures (see Finding 2).

² Because we did not statistically select the sample of performance measures, our results cannot be projected to the universe.

³ We selected 82 (3.7 percent) of the 2,199 expenses in excess of \$1,000 that IDEA Public Schools charged to the 3 grants. The dollar value (\$1,002,406) of these 82 expenses amounted to 6.6 percent of the \$15,117,046 in expenses charged to the three grants from July 1, 2017, through June 30, 2018. Because we did not statistically select the sample of expenses, our results cannot be projected to the universe.

Subsequent to the issuance of this OIG report, IDEA implemented the following corrective measures to address the OIG's recommendations:

- ◆ Although pending USDE approval, IDEA adopted an administrative procedure for ensuring that an adequately supported and complete annual performance report is timely filed;
- ◆ IDEA established a database for all the data reported on the annual performance report;
- ◆ For the annual performance report due in April 2020, IDEA submitted all final data for the 2018-2019 school year in conformance with clarifying guidance received from USDE; and
- ◆ IDEA issued a refund check to USDE on March 16, 2020, in the amount of \$23,525.

IDEA's Director of Public Grants continues to work collaboratively with the Senior Vice President of Finance/Controller to develop and implement internal controls to provide reasonable assurance that employees adhere to written policies for procurements and to prevent unallowable expenses from being charged to federal awards.

2.3. Alleged Political Assistance.

On April 27, 2020, *The Washington Post* published an article, “IDEA charter school network landed grants with political help from Education Department, congressman says”,⁹ regarding a letter sent by U.S. Congressman Mark Pocan to USDE concerning the issuance of a federal award to IDEA totaling \$72,241,152 in Charter Schools Program Grants to Charter Management Organizations for the Replication and Expansion of High-Quality Charter Schools.¹⁰ In his letter, Congressman Pocan alluded to “Allegations of irregularities and possible improprieties...” “over the administration of the 2020 Charter School Grants to Charter Management Organizations (CMO) for the Replication and Expansion of High-Quality Charter Schools Competition.” Specifically, Congressman Pocan referred to “previously expressed concerns about awards to CMOs with records of mismanagement and misuse of public dollars – specifically, entities such as IDEA Public Charter Schools”. We note that in our review and preparation of this White Paper that we have seen no evidence of any irregularities or possible improprieties pertaining to the referenced federal grants.

2.4. Applicability of Findings

The OIG’s findings and related recommendations have positively impacted how IDEA and its continued expansion and growth will be structured and operationalized, particularly the factors that may be used in determining whether IDEA LA, IDEA NOLA, IDEA Florida and other future affiliates are independent of IPS. Moreover, the OIG’s findings concerning IDEA’s administration of its CSP grants further highlights opportunities for improvements in how IDEA must report performance information and expend federal awards and account for said expenditures. The OIG’s factors are relevant to IDEA as it provides guidance as to the facets of the business arrangement between IPS and IDEA’s affiliates that USDE may consider in determining whether a federal award to IDEA may be used to fund the replication of its charter program to a charter operated by an affiliate.

Since the issuance of the OIG’s reports, IDEA has reviewed its Board policies and related practices to identify and improve its processes to address the OIG’s findings and other concerns and issues identified by IDEA’s Board, officers, staff, independent auditor, oversight agencies and legal counsel. Through this collective effort, IDEA has improved upon its processes over federal awards and other sources of funding and continues to evolve its administrative functions to further its organizational vision and mission and to comply with its legal and fiduciary obligations.

3. WHY CONFLICTS OF INTEREST AND RELATED PARTY DISCLOSURE MATTERS

Reportedly, Albert Einstein once said:

⁹ <https://www.washingtonpost.com/education/2020/04/27/idea-charter-schools-landed-grants-with-political-help-education-department-congressman-says/>

¹⁰ <https://oese.ed.gov/offices/office-of-discretionary-grants-support-services/charter-school-programs/charter-schools-program-grants-for-replications-and-expansion-of-high-quality-charter-schools/awards/>

I wish to do something great and wonderful but I must start by doing the little things like they were Great and Wonderful.

This is why disclosing conflicts of interest and related parties matters, and IDEA has painstakingly considered all legal considerations and structural options as it has taken steps in replicating into new states outside of Texas. In order for IDEA to fully realize its vision “To ensure students reach their potential [by becoming] the region’s largest creator of college graduates,” IDEA must act with integrity in all its business affairs, including the management services to be provided through IPS to IDEA LA, IDEA NOLA, IDEA Florida and potentially other future affiliates. Also, IDEA must ensure that its system is replicated with fidelity to consistently achieve student success. To this end, as it learns from its endeavors, both successful and otherwise, IDEA discloses herein its continually evolving structure for replication, business arrangements and affiliations.

4. DISCLOSURE OF AFFILIATIONS AND POTENTIAL CONFLICTS

Since its inception IDEA has been focused upon developing and refining its successful charter school program. However, until recently, IDEA’s efforts have been largely restricted to its origins in South Texas. Starting with the 2012-2013 school year, IDEA began to expand and replicate its charter program outside of South Texas when it opened schools in Austin and San Antonio. IDEA’s expansion and replication efforts were accomplished under its original corporate structure and through a single charter contract with the State of Texas. After thoughtful deliberation and to meet community need, IDEA agreed to expand and replicate its program to support high need students in schools that need improvement in Southeast Louisiana, beginning with Baton Rouge and then continuing with New Orleans. Recently, IDEA has begun to transition into Tampa Bay and Jacksonville, Florida and announced plans to expand into Ohio and potentially other states. To accomplish this goal, in Louisiana, IDEA opted to apply for a Type I Charter through separate legal entities formed under the laws of Louisiana: IDEA Louisiana and IDEA NOLA. Additionally, for Florida IDEA sought and received designation as a School of Hope operator and provided notice to Hillsborough County Public Schools and Duval County Public Schools of its intent to apply for and operate charter schools within each district. In the case of its Type I charters, Louisiana law simply did not allow IDEA (as a Texas corporation) to apply for and to itself be awarded a charter; rather, IDEA was required to form a Louisiana nonprofit corporation governed by residents of Louisiana. Louisiana’s requirement that IDEA organize a separate corporate charter holder raised governance concerns of how IDEA would ensure successful and complete replication of its proven system.

4.1. Business Units and Affiliations

IDEA was formed on January 27, 2000, as a nonprofit corporation pursuant to Texas law. In accordance with its Articles of Incorporation, as amended, IDEA does not have any members and is governed by its Board of Directors.

IDEA USA was formed on February 29, 2016, as a limited liability company under Texas law. In accordance with its Certificate of Formation, IDEA USA is governed by three members. However,

*White Paper Prepared for IDEA Public Schools
Disclosure of Business Relationships and Arrangements Pertinent to Implementation of
Charter School Program Grant for Replication and Expansion of High-Quality Charter Schools
as well as Support for Other Federal Grants and Private Philanthropy*

all three founding members were volunteers who have a long-standing affiliation with IDEA. Specifically, Michael Rhodes was a long-time member of IDEA's Board of Directors,¹¹ while Susan Valverde is an IDEA Rhodes Fellows Program Coach,¹² and Rex Gore is a member of the IDEA Austin Regional Board.^{13,14} The current members of IDEA USA are Susan Valverde, Rex Gore and Lori Rhodes.¹⁵

IDEA LA and IDEA NOLA were formed on February 25, 2016, and January 24, 2017, respectively, as nonprofit corporations under Louisiana law. In accordance with their Articles of Incorporation and Bylaws, IDEA LA and IDEA NOLA are governed by a board of directors, which are controlled by their respective sole corporate member – IDEA USA. IDEA USA has authority, under the bylaws and articles of IDEA LA and IDEA NOLA, to oversee the IDEA LA and IDEA NOLA board of directors, filling vacancies, approving any amendments to bylaws or articles, and similar duties; however, IDEA USA's role is oversight and not for actually governing or operating the Louisiana charter schools.

IDEA Florida was formed on April 26, 2019, as a nonprofit corporation under Florida law. In accordance with its Articles of Incorporation, IDEA Florida is governed by a Board of Directors consisting of three members: Trey Traviesa, Chair, Lizzette Gonzalez-Reynolds, Secretary,¹⁶ and Nick Rhodes.¹⁷ Under Florida law, a corporate member is not permitted as part of the governance structure.

IPS was formed on October 20, 2016, as a nonprofit and tax-exempt limited liability company under Texas and federal law. In accordance with its Certificate of Formation, IPS is governed by its sole member – IDEA. Subsequently, on October 10, 2019, pursuant to its Certificate of Conversion, IPS was converted from a limited liability company to a Texas nonprofit corporation. IDEA Public Schools is the corporate member if IPS and the IPS Board has overlapping persons serving on each entities' board of directors. Accordingly, IPS is essentially a nonprofit subsidiary of IDEA and is purposed to serve as the CMO entity for out-of-Texas replications of IDEA.

4.2. Corporate Compliance, Oversight and Risk Mitigation

As USDE is aware, the laws governing charter schools and their operational environment differ for each state. Moreover, although bearing many similarities with respect to applicable Federal laws and rules, the USDE grant programs administered by each state educational agency differ in

¹¹ Mr. Rhodes and his spouse, Lori Rhodes, are donors to IDEA, both individually and through their business holdings. Mr. Rhodes no longer serves on IDEA's Board of Directors.

¹² Ms. Valverde is the Vice President of Franchise Operations for Sylvan Learning, an IDEA affiliate.

¹³ Mr. Gore is co-founder and member of the Board of Directors of PelotonU, a 501(c)(3) post-secondary institution. The IDEA Austin Regional Board is a non-fiduciary advisory board giving support to IDEA schools in the region. Each in-Texas Region has a similar advisory board consisting of volunteers.

¹⁴ Mr. Gore and his spouse are donors to IDEA.

¹⁵ Ms. Rhodes has been a long-time philanthropic and volunteer supporter of IDEA.

¹⁶ Ms. Gonzalez-Reynolds serves on IDEA's Austin Regional Board.

¹⁷ Mr. Rhodes is the son of Michael Rhodes and Lori Rhodes.

how the Federal requirements are actually implemented programmatically and fiscally, as set forth in each state's application approved by USDE. The differences in state laws and in how state educational agencies implement USDE grant programs renders compliance with Federal and state laws, rules and policy somewhat complex. To better attain compliance with applicable legal requirements and to meet the state-law requirements of Louisiana, Florida and other states for an in-state nonprofit corporate charter holder, IDEA elected to maintain its corporate operations focused on its Texas charters and to form new corporate entities, IDEA LA, IDEA NOLA and IDEA Florida, to govern the Louisiana and Florida charters. Similar corporate structures will be used in future states' expansion of IDEA in accordance with each state's laws and permitted charter holder governance models. In this manner, IDEA could expand its program to Louisiana and Florida through IDEA LA, IDEA NOLA and IDEA Florida, as applicable, while not losing sight of its Texas charters and yet meet the varying compliance requirements adopted by each state. Thus, IDEA LA, IDEA NOLA and IDEA Florida are each independent fiduciary boards that are responsible for complying with Louisiana and Florida legal requirements, as applicable.¹⁸

With its decision to expand to Louisiana, IDEA began receiving invitations and entertaining the possibility of starting charters in other states, such as Florida, to continue to replicate its successful charter program and to expand the program to serve more students in other neglected and underserved communities. However, IDEA's general strategy is to control its growth and maintain the integrity of its charter program implementation, for the benefit of students. To accomplish this goal, IDEA formed IDEA USA. Conceptually, and where legally allowed, IDEA USA is to oversee the expansion of IDEA's charter program to other states through subsidiaries (corporate membership structures) such as IDEA LA and IDEA NOLA. In light of this intended focus and specialization and to further facilitate expansion, IDEA also formed a nonprofit corporation, IPS,¹⁹ to serve as the CMO to provide operational and support services that are integral to IDEA's out-of-Texas expansions. However, whereas IDEA USA is to serve as the means by which to oversee governance of the expanded program, IPS is to function as the mechanism by which to replicate the operations and administration of the program. Initially, to leverage its existing capacity, IDEA will utilize its personnel through a consulting service agreement to staff-up IPS for the new charter school and expend its other available resources to ensure a smooth and successful start-up of each new charter school, such as was the case with IDEA LA and as is being currently implemented for IDEA NOLA and IDEA Florida.

Due to the complexities of legal requirements in different jurisdictions, particularly with respect to the use of state funds, property acquired with state funds, property tax and sales tax exemptions, the related maintenance of records, employment law and associated operational needs and risks, IDEA also made its decision to form other corporations through which it would expand and

¹⁸ In a similar manner, IDEA proposes to form a nonprofit corporation within each state to which it endeavors to expand with the goal of having the created entity govern the charters of that state pursuant to the legal requirements adopted and implemented by the state into which IDEA expands.

¹⁹ As noted in footnote 2, IPS was originally formed as a limited liability company but was subsequently converted to a nonprofit corporation in October 2019.

replicate its charter program as a means of operational efficiency and mitigating its exposure to financial losses, enforcement actions, legal claims, sanctions and other risks. Although IDEA has endeavored, and will continue to endeavor, to implement a charter program that meets and exceeds the needs of its students, IDEA nonetheless deemed this consideration as prudent from a business point of view so as to limit the potential harm to its core Texas charter school program and to future charter school programs established in other states.

4.3. Mitigating Controls

To address the potential organizational conflicts of interest of the business units and their affiliations disclosed above, IDEA and its affiliates propose the adoption of a policy and procedure for the management of organizational conflict of interest. See Attachment A. Additionally, IDEA and its affiliates propose to address the following factors as described below:

- (a) Whether the charter school's governing board is selected by, or includes members who are employees of, the nonprofit CMO.

Mitigating Control. IDEA will not appoint future IDEA USA members. The founding members will replace any member that resigns or is otherwise no longer a member, but may receive appropriate input from IDEA. In this regard, IDEA USA's members replaced one board member, Michael Rhodes. However, IDEA did not provide IDEA USA members with a suggested replacement or other input. IDEA USA will refrain from appointing to subsidiary boards (excepting non-fiduciary advisory boards) any individual directly or indirectly then currently affiliated with IDEA.

- (b) Whether the contract between the charter school and the for-profit CMO was negotiated at "arm's length," clearly describes each party's rights and responsibilities, and specifies reasonable and feasible terms under which either party may terminate the contract (for example, the charter school does not lose the right to use facilities).

Mitigating Control. IPS and IDEA LA, IDEA NOLA and IDEA Florida (and ultimately other entities formed in other states), including its subsidiaries, has negotiated (and will negotiate) CMO contracts through disinterested individuals charged with seeking a fair and reasonable arrangement on behalf of their respective organization.

- (c) Whether the fee paid by the charter school to the IPS CMO is reasonable for the type of management services provided.

Mitigating Control. IPS and its subsidiaries will compare the contract fee to the cost of other similar CMO arrangements considering scope of services and other appropriate factors, and both IPS, IDEA LA, IDEA NOLA and IDEA Florida (and other future entities formed in other states) will ensure that the fee is fair, reasonable and not excessive and meets applicable legal standards.

- (d) Whether any other agreements (such as loans and leases) between the charter school and for-profit CMO are fair and reasonable, documented appropriately, align with market rates, and include terms that will not change if the management contract is terminated.

Mitigating Control. IDEA and IPS, including any other subsidiaries and other state-charter holders, has negotiated other arrangements and will negotiate any other future arrangements through disinterested individuals charged with seeking a fair and reasonable arrangement on behalf of their organization.

ATTACHMENT A: POLICY AND PROCEDURE FOR THE MANAGEMENT OF ORGANIZATIONAL CONFLICT OF INTEREST

NOTE: This policy is intended to be adopted or otherwise implemented by each entity that receives Federal funds directly from the U. S. Department of Education or through a pass-through entity.

Sec. 1. Purpose of Policy.

The Board of Directors (hereafter, the “Board”) and Chief Executive Officer (“CEO”) of [Enter corporate legal name here.] (hereafter, the “Organization”) shall endeavor to mitigate financial risk, the risk that accountability over Federal funds will be lacking, and performance risk that may arise from organizational conflicts of interest. Through this policy and procedure, the Board and CEO shall address the legal requirements, as applicable, promulgated at Code of Federal Regulations, Title 2, Section 200.318(c)(2).

Sec. 2. Applicability of Policy and Procedure.

This policy and procedure pertains to any business arrangement or transaction by and between the following legal entities (the “Affiliates”):

- (a) IDEA Public Schools, Inc.,
- (b) IDEA Public Schools USA, L.L.C.,
- (c) IDEA Public Schools Louisiana, Inc.,
- (d) IDEA Public Schools NOLA, Inc.,
- (e) IDEA Florida, Inc.,
- (f) IPS Enterprises, Inc., and
- (g) Any other affiliate or subsidiary subsequently identified.

Sec. 2. Key Terms Defined.

(a) *Charter holder* means the entity awarded a charter contract by any state (outside of Texas).

(b) *Charter Management Organization (CMO)* means IPS Enterprises, Inc. or “any organization that operates or manages one or more charter schools, whether under contract or as charter holder, without regard to the profit motive of the organization.”¹ CMO also includes education management organizations which “are considered to be organizations that provide “whole-school operation” services.”²

¹ U.S. Department of Education, Office of Inspector General, Final Audit Report, September 2016, ED-OIG/A02M0012, page 1

² *Ibid*

(c) *Financial risk* means “the risk of waste, fraud, and abuse resulting from conflicts of interest, related-party transactions, and insufficient segregation of duties.”³

(d) *Governing body of a charter holder* means the board of directors, board of trustees, or other governing body of a charter holder.

(e) *Organizational conflicts of interest* (or OCI) means “a situation in which, because of relationships with a parent company, affiliate, or subsidiary organization, the non-Federal entity is unable or appears to be unable to be impartial in conducting a procurement action involving a related organization.”⁴

(f) *OCI Arbitrator* means “an independent, natural person contracted by the Organization to settle a potential OCI.”

(g) *Performance risk* means “the risk that, as a result of charter school board ceding operational authority to CMOs, charter school stakeholders may not have sufficient assurance that grantees and subgrantees are implementing Federal programs in accordance with Federal requirements. As a result, the CMO may not provide charter school students with services that are in accordance with Federal program requirements.”⁵

(h) *Risk that accountability over Federal funds will be lacking* means “the risk that, as a result of charter school boards ceding fiscal authority to CMOs, charter school stakeholders (the authorizer, State educational agency (SEA), and Department) may not have accountability over Federal funds sufficient to ensure compliance with Federal requirements. As a result, the CMO may spend Federal funds on expenditures that are not in accordance with Federal law, regulation, and grant requirements.”⁶

Sec. 3. Designee(s).

In this policy, where the CEO is authorized to delegate authority to a designee (as denoted by the phrase “or designee”), the CEO may delegate such authority to a designee. If the CEO delegates authority to a designee, the CEO shall do so in writing through an administrative procedure, job description or internal memorandum. The CEO delegation of authority to a designee must be specific and must cite the policy section from which it is derived. Any delegation of authority to a designee not documented as set forth in this section shall be null and void.

³ U.S. Department of Education, Office of Inspector General, Final Audit Report, September 2016, ED-OIG/A02M0012, page 16

⁴ Code of Federal Regulations, Title 2, Section 200.318(c)(2)

⁵ U.S. Department of Education, Office of Inspector General, Final Audit Report, September 2016, ED-OIG/A02M0012, page 16

⁶ *Ibid*

Sec. 4. Procedure for Identifying and Reporting Potential OCI.

The Organization shall adhere to the following process to identify and report potential OCI to the Board and OCI Arbitrator.

- (a) The CEO or designee is required to review and approve any contract between the Organization and its Affiliates, purchase order issued by the Organization to any of its Affiliates or disbursement of Organizational funds to any its Affiliates.
- (b) The CEO or designee shall review annual conflict of interest disclosures prepared and filed where required by applicable law.
- (c) Upon the review of the above transactional records and disclosures, the CEO or designee shall disclose to the Board and OCI Arbitrator any potential OCI. The CEO's or designee's disclosure shall be in the form of a formal report providing any and all relevant facts.

Sec. 5. Procedure for Reviewing Potential OCI.

The Organization shall adhere to the following process when reviewing potential OCI.

- (a) The OCI Arbitrator shall review any potential OCI identified.
- (b) The OCI Arbitrator is authorized to request any and all information from the CEO or designee and the Affiliate(s) pertinent to the review of the potential OCI.
- (c) The OCI Arbitrator shall review the CEO's or designee's formal report disclosing the potential OCI and any and all other information requested from the CEO or designee and the Affiliate(s).
- (d) In reviewing the potential OCI, the OCI Arbitrator shall consider the following factors, both individually and collectively.
 - (1) The degree to which the proposed business arrangement or transaction is based upon an unequal access to information between the Organization and an Affiliate(s).
 - (2) The degree to which the proposed business arrangement or transaction is based upon biased ground rules that provide the proposed contractor with an unfair competitive advantage.
 - (3) The degree to which the proposed business arrangement or transaction is based upon an evaluation of the proposed contractor that was prepared by the proposed contractor.

- (4) The degree to which the proposed business arrangement or transaction was not negotiated at arm's length but instead was negotiated under pressure or duress by a controlling party or was the result of collusion between the Organization and an Affiliate(s).
- (5) The degree to which the Organization and Affiliate(s) disclosed the proposed business arrangement or transaction.
- (6) The degree to which an independent, third-party appraisal or analysis indicates that the business arrangement or transaction is equitable and reasonable.
- (7) The degree to which the business arrangement or transaction will adversely or detrimentally affect the Organization, particularly the students that it serves.
- (8) If the Organization can obtain, with reasonable effort, a more advantageous business arrangement or transaction from a natural person or legal entity that would not give rise to an OCI.
- (9) The proposed business arrangement or transaction as a whole without regard to any nonsubstantive intervening business arrangement or transaction taken to achieve the final results.

Sec. 6. Procedure for Managing Potential OCI.

The Organization shall adhere to the following process to manage potential OCI.

- (a) To mitigate potential OCI, the OCI Administrator shall develop and submit to the Board a formal OCI management plan.
- (b) If potential OCI cannot be mitigated, the OCI Administrator shall recommend that the proposed business arrangement or transaction be denied.
- (c) The Board shall review and approve the OCI management plan or disapprove the proposed business arrangement or transaction.



NOTICE OF REGULAR MEETING OF IDEA BOARD OF DIRECTORS

Notice is hereby given that a Regular Meeting of the Board of IDEA Public Schools will be held on July 17, 2020 beginning at 12:35 p.m. Meetings of the Board are normally held at 2115 West Pike Boulevard, Weslaco TX 78596. This meeting will be conducted via videoconference in accordance with the governor's authorization concerning suspension of certain open meeting law requirements for COVID-19 (Coronavirus) disaster.

Members of the public may access the meeting by dialing +1.408.915.6290; Meeting ID: 919 187 835. A quorum of members of the Board of will participate in the meeting and will be audible to the public. Members of the public may submit comments on any agenda items(s) to Jessica.Hess@ideapublicschools.org before or during consideration of the item. Anyone wishing to speak must email Jessica Hess at least 10 minutes before meeting start time.

Items will not necessarily be discussed or considered in the order they are printed on the agenda below. If, during the course of the meeting, discussion of any item on the agenda should be held in an executive or closed session, the Board will convene in such executive or closed session as permitted by and in accordance with the Texas Open Meetings Act, Texas Government Code Chapter 551.

Business Meeting Agenda

Discussion and possible action on the following agenda items

- 1) Welcome
- 2) Organizational Update
- 3) Public Comments
- 4) Review and potential approval of updated COVID Resolution
- 5) Review and potential approval of Amended MISD/IDEA contract
- 6) Ratify Distance Learning Submission to TEA for 2020-21
- 7) Resolution and Non-Expansion Amendment: Bylaws Revision
- 8) Committee Reports
- 9) Executive Session for Reasons Permissible by Texas Law (Codes 551.071, 551.072, 551.073, 551.074, 551.075, 551.076, 551.082, 551.083, 551.084). Executive Session for Reasons Permissible by Texas Law. Specifically, pursuant to Govt Code sections 551.071, 551.074, 551.07. Consultation with legal counsel regarding pending legal matters. Personnel, including superintendent/CEO and Senior Leaders (Chief College & Diversity Officer, Chief Advancement Officer, Chief Program Officer, Chief Operating Officer, Chief Human Assets Officer, Chief Financial Officer, Chief Schools Officer) positions, compensation and contracts. Purchase of future potential school sites.
- 10) Review and approve policy updates
- 11) Consideration and possible action on approval of Superintendent/CEO compensation and contract
- 12) Consideration and possible action approval of compensation and contracts for 2020-21 for Senior Leaders (Chief College & Diversity Officer, Chief Advancement Officer, Chief Program Officer, Chief Operating Officer, Chief Human Assets Officer, Chief Financial Officer, Chief Schools Officer)
- 13) Real Estate
 - a) Consider and approve RESOLUTION APPROVING THE PURCHASE OF PROPERTY IN HIDALGO COUNTY, TEXAS.
 - b) *Consider and approve* RESOLUTION APPROVING THE PURCHASE OF PROPERTY IN MIDLAND COUNTY, TEXAS.
 - c) *Consider and approve* RESOLUTION APPROVING THE PURCHASE OF PROPERTY IN WILLIAMSON COUNTY
 - d) *Consider and approve* RESOLUTION APPROVING THE PURCHASE OF PROPERTY IN TARRANT COUNTY, TEXAS.



- e) Consider and approve RESOLUTION APPROVING THE PURCHASE OF PROPERTY IN HAYS COUNTY, TEXAS.
- f) Consider and approve RESOLUTION APPROVING THE SALE OF PROPERTY IN TARRANT COUNTY, TEXAS.
- g) Consider and take action AUTHORIZING SALE OF LOS FRESNOS PROPERTY.

14) Consent Agenda

- a) May 2020 Financial Statements
- b) May 2020 Budget Amendments
- c) 2020-21 Employee Handbook
- d) 2020-21 Student Handbook
- e) Contracts
 - i) EPIC Insurance Renewal
 - ii) IT: Zendesk
 - iii) Academic Services: NMSI (National Math and Science Initiative) Engagement
 - iv) Facilities and Construction: ETHOS Engineering, Telepro
 - v) Human Assets: Compensation Consultant Contract (subject to legal review)
- f) Philanthropic Report and Approvals
- g) Interlocal Cooperation Agreement, Regional Day School Program for the Deaf at McAllen ISD

15) Adjournment

16) Addendum

- a. Bylaws
- b. Board Operations Document
- c. Board Member Term Information

In accordance with the Texas Open Meetings Act (Subchapters D and E of Ch. 551, Texas Government Code), the Board may enter into closed / executive session to deliberate any subject authorized by Subchapter D that is listed on the Agenda for this meeting. Before any closed / executive session is convened, the presiding officer will publicly identify the section or sections of the Act authorizing the closed / executive session. Any final action, decision, or vote on a subject deliberated in closed / executive session will be conducted in open session in compliance with the Texas Open Meetings Act.

This notice was posted at 12:35 p.m. on July 14, 2020

**IDEA Public Schools
Board of Directors Meeting
July 17, 2020**

Board Members Present: Reba Cardenas McNair, Al Lopez, Xenia Garza, David Earl, David Handley, Bill Martin, Ryan Vaughan, Michael Burke, Ed Rivera, Dr. Saam Zarrabi, Collin Sewell, Victoria Rico, Erich Holmsten (joined at 1:05 p.m.)

Staff Present: Jessica Hess, JoAnn Gama, Samuel Goessling, Irma Muñoz, Dolores Gonzalez, Phillip Garza, Martin Winchester, Elizabet Garza, Leonel Garza, José Ramírez IV, Leanne Hernandez, Carlo Hershberger, Stephanie Perryman, Javier Campos

Audience Present: Joseph Hoffer of Schulman, Lopez, Hoffer & Adelstein LLP, Tom Sage & Darren McHugh of Hunton Andrews Kurth LLP, Drew Masterson of Masterson Advisors LLC, John Buck of Buck Financial Advisors

Meeting is called to order by Chair, Al Lopez, at 12:03 p.m.

Summary of Motions and Approvals

1. The Board passed a motion to approve the updated COVID resolution.
Motion by: David Earl
Second by: Xenia Garza
All in favor: Vote passes unanimously
2. The Board passed a motion to approve the amended Midland ISD/IDEA contract.
Motion by: Mike Burke
Second by: David Earl
All in favor: Vote passes unanimously
3. The Board passed a motion to ratify the distance learning submission to TEA for 2020-2021
Motion by: David Earl
Second by: Ryan Vaughan
All in favor: Vote passes unanimously
4. The Board passed a motion to adopt resolution and non-expansion amendment regarding the Bylaws Revision.
Motion by: Ed Rivera
Second by: Xenia Garza
All in favor: Vote passes unanimously
5. The Board passed a motion to go into Executive Session at 1:40 p.m.
Motion by: Ed Rivera
Second by: David Earl

All in favor: Vote passes unanimously

6. The Board passed a motion to reconvene in Open Session at 4:34 p.m.
Motion by: Bill Martin
Second by: Xenia Garza
All in favor: Vote passes unanimously
7. The Board passed a motion to approve policies as discussed in Executive Session.
Motion by: David Earl
Second by: David Handley
All in favor: Vote passes unanimously
8. The Board passed a motion to approve engagement of special counsel as discussed in Executive Session.
Motion by: Ed Rivera
Second by: Bill Martin
All in favor: Vote passes unanimously
9. The Board passed a motion to approve Superintendent/CEO compensation & contract.
Motion by: Bill Martin
Second by: Xenia Garza
All in favor: Vote passes unanimously
10. The Board passed a motion to approve compensation and contracts for 2020-2021 for Senior Leaders as discussed during Executive Session.

Motion by: Ryan Vaughan
Second by: Dr. Saam Zarrabi
All in favor: Vote passes unanimously
11. The Board passed a motion to approve the six (6) real estate resolutions including: (i) a purchase in Hidalgo County, (ii) a purchase in Midland County, a purchase in Williamson County, (iii) a purchase in Tarrant County, (iv) a purchase in Hayes County, (v) a sale of the property in Tarrant County, and (vi) as well as approving that the management team pursues sale of a property in Los Fresnos, Texas. The properties in Tarrant County and Los Fresnos, Texas have been declared surplus.
Motion by: David Earl
Second by: Ed Rivera
All in favor: Vote passes unanimously

12. The Board passed a motion to approve all items on the consent agenda items in one Board action.

Motion by: David Earl (all consent agenda items as stated)

Second by: Ryan Vaughan

All in favor: Vote passes unanimously

13. The Board passed a motion to adjourn the meeting at 4:44 p.m.

Motion by: Ryan Vaughan

Second by: Xenia Garza

All in favor: Vote passes unanimously

Welcome and Call to Order

Al Lopez welcomed the Board Members to the July 17, 2020 Board of Directors meeting and confirmed quorum was present for the meeting in addition to members of the management team that were present as well. Mr. Lopez went on to state that given the Governor's suspension of parts of the Open Meetings Act they are conducting today's meeting via video conference and have a phone line for members of the public to join in the meeting should they wish to do so. Mr. Lopez noted they have a variety of updates to receive today and critical business items to take care of as he called the meeting to order. Mr. Lopez asked for public comment to which there was none.

CEO Update by JoAnn Gama

Ms. Gama provided an update on the five Board-wide goals in terms of where they are at for what they are calling "Strong Start":

1. on track to hit 100% college matriculation;
2. 96% persistence on track;
3. 85% staff retention on track;
4. Enrollment target (mostly concerned about this goal; 63,780; 85% registered; COVID issues); and
5. Fundraising goal has been met.

Ms. Muñoz provided additional information regarding 2019-2020 Year in Review/Management and the team provided additional details. The team also provided updates on how IDEA intends to operate in 2020-2021 based on current guidance. Ms. Gama provided an update on IDEA's in-person plans and continued providing updates on 2020-2021 goals and organization-wide priorities. Ms. Gonzalez provided additional information regarding end of year assessments for Austin and McAllen schools. Ms. Gama finished by reporting that more information will come in August and will be provided to the Board for review.

Updated COVID Resolution

The Board passed a motion to approve the updated COVID resolution

Motion by: David Earl

Second by: Xenia Garza

All in favor: Vote passes unanimously

Amended MISD/IDEA Contract

The Board passed a motion to approve the amended Midland ISD/IDEA contract.

Motion by: Mike Burke

Second by: David Earl

All in favor: Vote passes unanimously

Distance Learning Submissions to TEA for 2020-2020

The Board passed a motion to ratify the distance learning submission to TEA for 200-2021

Motion by: David Earl

Second by: Ryan Vaughan

All in favor: Vote passes unanimously

Resolution and Non-Expansion Amendment: Bylaws Revision

The Board passed a motion to adopt the resolution and non-expansion amendment regarding the Bylaws revision.

Motion by: Ed Rivera

Second by: Xenia Garza

All in favor: Vote passes unanimously

Committee Reports:

Finance Committee (Bill Martin)

- a. June 30 cash on hand (146 days); Goal 140;
- b. Debt service ratio projected 1.65;
- c. Gold star recognition again 90% above great places to work survey for 2019-2020;
- d. 2020-2021 budget \$134M loaded into system;
- e. External auditors say financial audit can proceed on schedule; Considering delay full report to Board until audit completed; and
- f. Real property purchases in Texas focused on 2022 & 2023 school years and are on track.

Audit Committee (Ed Rivera)-

- a. Just formed based on work we are doing on governance;
- b. Joe Hoffer provided overview of role and duties/responsibilities;
- c. Internal audit staff/work introduces + current resources available for internal audit;
- d. Discussed need for additional staff;
- e. Javier Campos presented report/annual risk assessment; and
- f. July 7 meeting opted to have another July 31 meeting to continue moving forward.

Governance Committee (David Handley provides update)-

- a. One meeting has been conducted, another is scheduled for next week;
- b. Gabe Puente has resigned;
- c. Review tenets regarding Board member recruit;
- d. Geographical needs;
- e. Reviewing current regional Board to see if there is interest; and

- f. Updated Bylaws & Board structure to reflect title changes on executive committee.

Academic Committee (Xenia Garza)-

- a. Al Lopez, Dr. Saam Zarrabi, Michael Burke are the Board committee members;
- b. Dolores Gonzalez, Phillip Garza, Lisa Garza are the IDEA committee members; and
- c. Upcoming meeting on July 30.

Executive Session

The Board passed a motion to approve transition into Executive Session to discuss matters pertaining to personnel, Chief of School roles, pending legal matters, and invited JoAnn Gama, Jessica Hess, Jennifer Meer, and attending legal counsel to join.

Motion by: Ed Rivera

Second by: David Earl

All in favor: Vote passes unanimously

Business meeting reconvened into Open Session at 4:34 p.m.

Legal counsel was present for the entirety of Executive Session. All discussion was related to stated issues above, and pertinent to legal discussion and counsel. No action took place in Executive Session.

Note: Mike Burke, Victoria Rico, Erich Holmsten were no longer in attendance at this point in the meeting. Quorum still present.

The Board passed a motion to reconvene in Open Session at 4:34 p.m.

Motion by: Bill Martin

Second by: Xenia Garza

All in favor: Vote passes unanimously

The Board Chair stated that no action had occurred on closed session.

Policy Updates

The Board passed a motion to approve policies as discussed in Executive Session.

Motion by: David Earl

Second by: David Handley

All in favor: Vote passes unanimously

Approval of Engagement of Special Counsel

The Board passed a motion to approve engagement of special counsel as discussed in Executive Session.

Motion by: Ed Rivera

Second by: Bill Martin

All in favor: Vote passes unanimously

Approval of Superintendent/CEO Compensation and Contract

The Board passed a motion to approve Superintendent/CEO compensation & contract.

Motion by: Bill Martin

Second by: Xenia Garza

All in favor: Vote passes unanimously

Note: Mr. Lopez noted that Ms. Gama has abstained from discussion and recused herself from this portion where the Board voted on this Motion. Before the vote, the Board reviewed comparability data for the compensation level for this position prior to making a decision and ensured that no persons with any conflict of interest has participated in the Board's deliberations. Further, with support of the compensation study and approving the motion the Board finds that the total compensation is fair, reasonable and not excessive in accordance with TEA rules. The compensation is appropriate considering this individual's work experience, salary history, duties, responsibilities, education and other facts. This role is also found to be necessary to serve our students given the restructure of our senior leadership team at IDEA Public Schools.

Ms. Gama rejoined the meeting after this vote.

Approval of Compensation and Contracts for 2020-2021 Senior Leaders

The Board passed a motion to approve compensation and contracts for 200-2021 for Senior Leaders as discussed during Executive Session.

Motion by: Ryan Vaughn

Second by: Dr. Saam Zarrabi

All in favor: Vote passes unanimously

Note: Each chief abstained from discussion and recused themselves from this portion where the Board voted on this Motion. Before the vote, the Board reviewed comparability data for the compensation level for each position prior to making a decision and no persons with any conflict of interest has participated in the Board's deliberations. Further, with support of the compensation study and approving the motion the Board finds that the total compensation for each position is fair, reasonable and not excessive in accordance with TEA rules. The compensation is appropriate considering these individuals' work experience, salary history, duties, responsibilities, education and other facts. Each position is also found to be necessary to serve our students at IDEA Public Schools.

Real Estate

The Board passed a motion to approve the six (6) real estate resolutions including: (i) a purchase in Hidalgo County, (ii) a purchase in Midland County, a purchase in Williamson County, (iii) a purchase in Tarrant County, (iv) a purchase in Hayes County, (v) a sale of the property in Tarrant County, and (vi) as well as approving that the management team pursues sale of a property in Los Fresnos, Texas. The properties in Tarrant County and Los Fresnos, Texas have been declared surplus.

Motion by: David Earl
Second by: Ed Rivera
All in favor: Vote passes unanimously

Consent Agenda

The Board reviewed all consent agenda items listed:

- a. May 2020 Financial Statements
- b. May 2020 Budget Amendments
- c. 2020-2021 Employee Handbook
- d. 2020-2021 Student Handbook
- e. Contracts
 - i. EPIC Insurance Renewal
 - ii. IT: Zendesk
 - iii. Academic Services: NMSI (National Math and Science Initiative) Engagement
 - iv. Facilities and Construction: ETHOS Engineering, Telepro
 - v. Human Assets: Compensation Consultant Contract (subject to legal review)
- f. Philanthropic Report and Approvals
- g. Interlocal Cooperation Agreement, Regional Day School Program for the Deaf at McAllen ISD

The Board passed a motion to approve all items on the consent agenda in one Board action.

Motion by: David Earl (all consent agenda items as stated)
Second by: Ryan Vaughn
All in favor: Vote passes unanimously

Adjourn

The Board passed a motion to adjourn the meeting at 4:44 p.m.

Motion by: Ryan Vaughn
Second by: Xenia Garza
All in favor: Vote passes unanimously

I certify that the foregoing are the true and correct minutes of the meeting of the Board of Directors of IDEA Public Schools held on July 17, 2020.

Ryan Vaughan, Board Secretary



Schulman,
Lopez, Hoffer
& Adelstein, LLP

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ATTORNEYS AND COUNSELORS FOR TEXAS PUBLIC SCHOOLS AND LOCAL GOVERNMENT

Release Authorized: Privilege-waived
CONFIDENTIAL ATTORNEY - CLIENT COMMUNICATION

May 2020

Via E-mail Transmission

IDEA Public Schools
c/o Board of Directors
2115 West Pike Boulevard
Weslaco, TX 78596

Re: Executive Compensation Study

Dear Board Members and Ms. Gama:

The Board of Directors and Superintendent seeks, with the assistance of the undersigned legal counsel, to procure compensation data for the positions of Chief Officers, Executive Directors and Regional Superintendents to ensure the compensation to each individual is fair, reasonable and not excessive in accordance with IRS rules and guidelines, and TEA regulations. This review has become even more important due to recent focus on charter school leadership compensation by the Texas Education Agency, members of the State Board of Education, news media, and the public.

The Texas Education Agency has adopted 19 Tex. Admin. Code § 100.1022 relating to standards for revoking or modifying the governance of an open-enrollment charter school, which includes payment of compensation to an individual in excess of the fair market value of the services provided as “serious unsatisfactory financial performance.” The TEA defines the fair market value of the services rendered as being “**based on the individual's education, experience, prior salary history, the job duties actually performed, and what a typical person with similar skills, experience, and job duties would earn.**” TEA specifically looks toward Texas compensation for educators and administrators as their main data source.

Additionally, the payment of unreasonable or excessive compensation can also result in the imposition of significant penalties against both the individual receiving excessive compensation and the Board members or officers that knowingly approved of excessive compensation. Whether any given individual's compensation is fair and reasonable requires a case-by-case determination but can be supported by gathering and comparing compensation data for similarly situated persons.

May 2020

The IRS has stated that an individual's compensation is presumptively reasonable if the Board has taken and appropriately documented the following three steps:

- 1) The Board obtained and relied on appropriate comparability data in making its determination;
- 2) The total compensation package was approved in advance by the Board, and no individuals who had an actual or potential conflict of interest with respect to the compensation arrangement participated in deliberations; and
- 3) The Board adequately and contemporaneously documented the basis for its determination.

In addition to the above IRS-specific steps and findings, we also advise that the Board find the compensation is "not in excess of fair market value based on the individual's education, experience, prior salary history, the job duties actually performed, and what a typical person with similar skills, experience, and job duties would earn." This advisory and compensation data considers available and comparable Texas compensation data.

It is our understanding that the Board is considering approval of the annual compensation of Chief Officers, Executive Directors and Regional Superintendents, provided the compensation offered is legally supportable, based on the receipt and review by the Board of compensation comparability data.

The GuideStar Compensation Report

In order to assist you in this review, we have recommended that IDEA use compensation comparability data available through GuideStar, a nationally recognized nonprofit reviewer and profiler. GuideStar offers comprehensive compensation data tables, compiled from nonprofit tax submissions to the IRS. For our review and for your information, we have analyzed the *2019 GuideStar Nonprofit Compensation Report* and related data tables (the "Compensation Report"). While the Compensation Report is too large to include as an attachment to this letter, relevant excerpts from the report are included as Exhibit A. The full report is available for inspection as needed.

GuideStar's data is reliable and comprehensive, as it is drawn directly from nonprofit IRS submissions nationwide. However, as it relies on IRS submissions, it also lags behind by a year or more due to the difference between current year and reported tax years where data is released and available from the IRS. The *2019 GuideStar Nonprofit Compensation Report* is based on 162,853 observations from 113,549 Forms 990 and 990-EZ filed by 501(c) organizations with the IRS for fiscal year 2017. Information collected from organizations exempt under section 510(c)(3) of the Internal Revenue Code has been reported separately from other nonprofit organizations. The GuideStar Nonprofit Compensation Report remains the only large-scale analysis of its kind based entirely on data reported to the IRS. It also continues to be the most comprehensive nonprofit compensation study available. The Compensation Report also provides a break down by industry, including education (and subcategories), and by budget size.

May 2020

For education-related nonprofit entities,¹ reporting a budget greater than \$5 million, the following GuideStar data is available *nationally*:

Position	Average	10th Percentile	25th Percentile	Median	75th Percentile	90th Percentile
CEO/Executive Director	\$298,269	112,337	150,496	224,844	357,177	533,227
Top Administrative Position	186,976	96,766	122,641	167,771	223,276	319,394
Top Business Position	156,031	75,312	103,689	139,586	186,502	252,236
Top Development Position	190,620	111,763	134,709	171,204	223,423	292,347
Top Education Position	210,265	113,033	137,244	174,248	234,328	346,086
Top Finance Position	183,191	85,992	116,789	158,012	216,497	303,669
Top Human Resources Position	185,362	106,511	127,167	156,875	211,036	313,161
Top Operations Position	190,825	97,683	122,881	158,346	218,329	296,858
Top Program Position	167,916	118,276	126,465	151,270	176,995	246,175

For charter schools,² reporting a budget greater than \$50 million (no data available where blank):

Position	Average	10th Percentile	25th Percentile	Median	75th Percentile	90th Percentile
CEO/Executive Director	\$245,577		177,308	233,516	278,270	
Top Administrative Position	191,660			177,308		
Top Education Position	158,196			159,684		
Top Finance Position	158,449			158,760		
Top Operations Position	145,511			148,230		

¹ The categorization of education-related nonprofit entities is based on the National Taxonomy of Exempt Entities code/classification system (“NTEE”) which is a nationally recognized system for categorizing the activities and purposes of nonprofit organizations. The data is based on the major group of entities classified as “education” related. The NTEE system also has subcategories for elementary and secondary schools and charter schools and where this level of data was available from GuideStar, it is presented.

² *Id.*

May 2020

For elementary and secondary schools, reporting a budget greater than \$50 million:

Position	Average	10th Percentile	25th Percentile	Median	75th Percentile	90th Percentile
CEO/Executive Director	\$500,543	173,689	292,125	513,970	628,006	899,496
Top Administrative Position	218,698			228,472		
Top Development Position	247,444		193,941	255,805	285,193	
Top Education Position	194,640		169,073	192,645	229,687	
Top Finance Position	270,103	158,211	231,815	256,626	300,852	378,352
Top Human Resources Position	180,782			166,236		
Top Operations Position	219,732			268,156		

For secondary and high schools, reporting a budget greater than \$50 million:

Position	Average	10th Percentile	25th Percentile	Median	75th Percentile	90th Percentile
CEO/Executive Director	\$471,148		267,582	433,831	639,052	
Top Development Position	282,936		200,823	265,605	297,626	
Top Education Position	209,285			214,917		
Top Finance Position	267,479		229,668	283,442	320,652	

Similar Texas-specific GuideStar data for education-related nonprofit organizations, reporting a budget greater than \$5 million, is also available:

Position	Average	10th Percentile	25th Percentile	Median	75th Percentile	90th Percentile
CEO/Executive Director	\$304,008	105,632	141,985	204,474	341,480	522,316
Top Administrative Position	157,255	86,666	110,357	137,098	185,122	246,138
Top Business Position	165,696		83,009	110,359	228,850	
Top Development Position	186,797	113,778	125,747	160,441	214,144	260,086

Top Education Position	199,503	82,515	106,649	144,015	223,622	382,861
Top Finance Position	160,403	74,558	98,000	137,056	206,762	283,225
Top Human Resources Position	160,265		123,494	155,525	188,728	
Top Operations Position	167,605	91,928	107,141	130,000	182,581	330,615

As indicated, the data above is several years old, and as expected lags given IRS reporting and collation of this information by GuideStar, and more recent data is not available at this time; however, this data may assist the Board in assessing the proposed salaries.

PEIMS Reports - Texas Education Agency

Additional data was collected by accessing information publicly available on the Texas Education Agency website. Below are 2019-2020 base salaries for districts (not necessarily total compensation) with similar enrollment to IDEA:

District	Enrollment	Position	Salary
Aldine ISD	66,854	Asst/Assoc/Deputy Superintendent	\$ 171,191
		Dir-Personnel/Human Resources	105,484
		Dir Instr, Program Dir or Exec Dir	88,075
		Superintendent/CAO/CEO/President	312,261
Alief ISD	45,436	Asst/Assoc/Deputy Superintendent	\$ 181,326
		Dir-Personnel/Human Resources	123,007
		Dir Instr, Program Dir or Exec Dir	106,847
		Superintendent/CAO/CEO/President	381,315
Arlington ISD	59,900	Asst/Assoc/Deputy Superintendent	\$ 156,103
		Business Manager	163,612
		Dir Instr, Program Dir or Exec Dir	122,807
		Superintendent/CAO/CEO/President	319,637
Austin ISD	80,911	Asst/Assoc/Deputy Superintendent	\$ 180,727
		Business Manager	274,896
		Dir-Personnel/Human Resources	137,177
		Dir Instr, Program Dir or Exec Dir	122,089
		Superintendent/CAO/CEO/President	329,813
Brownsville ISD	44,402	Asst/Assoc/Deputy Superintendent	\$ 161,841
		Business Manager	139,290
		Dir-Personnel/Human Resources	107,795

May 2020

		Superintendent/CAO/CEO/President	354,128
Clear Creek ISD	42,205	Asst/Assoc/Deputy Superintendent	\$ 196,311
		Business Manager	98,775
		Dir-Personnel/Human Resources	113,478
		Dir Instr, Program Dir or Exec Dir	101,241
		Superintendent/CAO/CEO/President	325,678
Conroe ISD	62,837	Asst/Assoc/Deputy Superintendent	\$ 186,982
		Business Manager	192,107
		Dir-Personnel/Human Resources	172,287
		Dir Instr, Program Dir or Exec Dir	105,777
		Superintendent/CAO/CEO/President	310,500
Dallas ISD	153,861	Asst/Assoc/Deputy Superintendent	\$ 167,031
		Business Manager	109,396
		Dir-Personnel/Human Resources	107,470
		Superintendent/CAO/CEO/President	351,750
El Paso ISD	57,315	Asst/Assoc/Deputy Superintendent	\$ 135,903
		Business Manager	81,862
		Dir-Personnel/Human Resources	98,467
		Dir Instr, Program Dir or Exec Dir	93,718
		Superintendent/CAO/CEO/President	380,918
Fort Bend ISD	77,756	Asst/Assoc/Deputy Superintendent	\$ 187,920
		Business Manager	160,000
		Dir-Personnel/Human Resources	130,220
		Dir Instr, Program Dir or Exec Dir	122,964
		Superintendent/CAO/CEO/President	363,911
Fort Worth ISD	82,891	Asst/Assoc/Deputy Superintendent	\$ 185,391
		Dir Instr, Program Dir or Exec Dir	101,794
		Superintendent/CAO/CEO/President	342,000
Frisco ISD	60,182	Asst/Assoc/Deputy Superintendent	\$ 171,707
		Business Manger	190,000
		Dir-Personnel/Human Resources	133,037
		Dir Instr, Program Dir or Exec Dir	102,457
		Superintendent/CAO/CEO/President	325,000

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Garland ISD	55,987	Asst/Assoc/Deputy Superintendent	\$ 154,202
		Business Manager	216,592
		Dir-Personnel/Human Resources	131,929
		Dir Instr, Program Dir or Exec Dir	133,063
		Superintendent/CAO/CEO/President ³	254,167
		Superintendent ⁴	329,318
Houston ISD	210,061	Asst/Assoc/Deputy Superintendent	\$ 147,895
		Business Manager	107,771
		Dir-Personnel/Human Resources	194,361
		Dir Instr, Program Dir or Exec Dir	89,721
		Superintendent/CAO/CEO/President	345,060
Humble ISD	43,553	Asst/Assoc/Deputy Superintendent	\$ 152,527
		Business Manager	189,010
		Dir-Personnel/Human Resources	165,549
		Dir Instr, Program Dir or Exec Dir	89,966
		Superintendent/CAO/CEO/President	316,240
Killeen ISD	44,974	Asst/Assoc/Deputy Superintendent	\$ 181,415
		Business Manager	175,240
		Dir-Personnel/Human Resources	107,632
		Dir Instr, Program Dir or Exec Dir	98,859
		Superintendent/CAO/CEO/President	310,000
Klein ISD	53,328	Asst/Assoc/Deputy Superintendent	\$ 190,998
		Business Manager	213,274
		Dir-Personnel/Human Resources	124,607
		Dir Instr, Program Dir or Exec Dir	127,619
		Superintendent/CAO/CEO/President	330,000
KIPP Texas	28,672	Asst/Assoc/Deputy Superintendent	\$ 135,369
		Dir-Personnel/Human Resources	168,912
		Dir Instr, Program Dir or Exec Dir	95,598
		Superintendent/CAO/CEO/President ³	236,406
		Superintendent ⁴	375,000

³ The salary for this position is the average full time equivalent of multiple individuals that fit this description found in the [PEIMS Staff FTE Counts and Salary Reports](#).

⁴ The salary for this position is for the individual identified as the Superintendent found in the [PEIMS Superintendent Salary Reports](#).

May 2020

Lewisville ISD	52,218	Asst/Assoc/Deputy Superintendent	\$ 178,120
		Business Manager	141,270
		Dir-Personnel/Human Resources	125,706
		Dir Instr, Program Dir or Exec Dir	98,814
		Superintendent/CAO/CEO/President	289,170
North East ISD	65,186	Asst/Assoc/Deputy Superintendent	\$ 170,421
		Business Manager	178,296
		Dir-Personnel/Human Resources	108,751
		Dir Instr, Program Dir or Exec Dir	93,420
		Superintendent/CAO/CEO/President	290,001
Northside ISD	107,817	Asst/Assoc/Deputy Superintendent	\$ 170,144
		Dir-Personnel/Human Resources	103,708
		Dir Instr, Program Dir or Exec Dir	121,414
		Superintendent/CAO/CEO/President	345,652
Pasadena ISD	53,291	Asst/Assoc/Deputy Superintendent	\$156,206
		Dir Instr, Program Dir or Exec Dir	103,397
		Superintendent/CAO/CEO/President	300,000
Plano ISD	53,057	Asst/Assoc/Deputy Superintendent	\$ 192,210
		Business Manager	60,483
		Dir-Personnel/Human Resources	141,374
		Dir Instr, Program Dir or Exec Dir	93,848
		Superintendent/CAO/CEO/President	307,562
Round Rock ISD	50,387	Asst/Assoc/Deputy Superintendent	\$ 155,995
		Business Manager	181,585
		Dir-Personnel/Human Resources	138,355
		Dir Instr, Program Dir or Exec Dir	96,709
		Superintendent/CAO/CEO/President	301,190
San Antonio ISD	48,745	Asst/Assoc/Deputy Superintendent	\$ 152,352
		Dir-Personnel/Human Resources	103,556
		Dir Instr, Program Dir or Exec Dir	98,015
		Superintendent/CAO/CEO/President	315,054
Socorro ISD	46,814	Asst/Assoc/Deputy Superintendent	\$ 135,576
		Business Manager	154,786
		Dir-Personnel/Human Resources	99,317
		Dir Instr, Program Dir or Exec Dir	99,966
		Superintendent/CAO/CEO/President	387,571

May 2020

United ISD	43,364	Asst/Assoc/Deputy Superintendent	\$ 148,285
		Business Manager	115,222
		Dir-Personnel/Human Resources	103,679
		Dir Instr, Program Dir or Exec Dir	84,369
		Superintendent/CAO/CEO/President	310,056
YES Prep	12,074	Asst/Assoc/Deputy Superintendent	\$ 108,818
		Business Manager	162,233
		Dir-Personnel/Human Resources	66,690
		Dir Instr, Program Dir or Exec Dir	98,048
		Superintendent/CAO/CEO/President	275,000

IRS Form 990 National Large Charter Networks

The following data regarding revenue and salary for large national charter networks was collected from individual 2017-2018 Form 990's available on the IRS website.⁵

Organization	Location	Enrollment	2017-18 Revenue	Position	Salary ⁶
Achievement First	NY, CT, RI	13,940	\$ 57,013,087	CEO/Super	\$ 309,976
				CFO	196,540
				Regional Super (avg.)	214,186
				COO	237,807
				Chief Talent Officer	204,771
Aspire Public Schools	Calif., Memphis	17,000	212,107,665	CEO	333,819
				CFO	268,856
				COO	260,446
				CAO	210,979
				Area Super (avg.)	264,691
				Assoc. Super (avg.)	177,288
Democracy Prep	NY, NJ, La, Las Vegas, San Antonio	6,370	28,178,452	CEO	316,882

⁵ As with the GuideStar Report, this information also lags behind by a year or more due to the difference between current year and reported tax years where data is released and available from the IRS.

⁶ Salary includes base compensation and reportable compensation from related entities as reported on Form 990.

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Organization	Location	Enrollment	2017-18 Revenue	Position	Salary ⁶
				CFO	228,539
				S. VP of HR	196,709
Great Hearts America	Phoenix, San Antonio, Dallas	18,859	31,711,799	CEO	230,228
				CFO	148,429
				CAO	168,935
GreenDot	CA, TN	8,312	14,565,642	CEO	354,022
				CFO	228,878
				COO	228,274
Harmony	Texas	35,000	345,542,072	CEO	221,333
				CFO	120,214
				Superintendent	142,447
				CAO	113,164
				Chief HR Officer	113,440
				Area Super (avg.)	109,046
Imagine Schools	AZ, CA, CO, DC FL, MD, NV, OH, TX	32,000	31,084,438	CEO	\$ 220,000
				CFO	390,000
				CAO	200,000
				Executive VP (avg.)	153,500
KIPP Bay Area	California	6,172	76,725,731	CEO	263,764
				CFO	173,828
				CGOO	209,303
				Chief of Schools	216,228
Lifelong Learning	CA	50,000	38,67,394	CEO	414,645
				VP Finance	200,629
				Chief HR Officer	231,437
				VP Curriculum	223,292

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Organization	Location	Enrollment	2017-18 Revenue	Position	Salary ⁶
Noble Network	Chicago	12,334	183,548,843	CEO	301,496
				CAO	227,842
				COO	224,905
				Head of Schools	245,411
Responsive Ed	Texas, Ark	20,000	184,191,324	CEO	234,867
				COO	199,439
				Chief Learning Officer	150,763
Rocketship	CA,TN,DC,WI	9,805	98,757,579	CEO	274,697
				CFO	298,294
				CPO	245,972
				CGO	235,789
Success Academy	NYC	18,285	81,159,815	CEO	889,051
				CFO	360,175
				CAO	308,454
				COO	330,719
Uncommon	NY, NJ	20,054	46,882,829	CEO	333,584
				CFO	216,359
				CAO	176,885
				COO	191,031
				Chief of Staff	245,089
				Chief Schools Officer	258,747
Uplift	Dallas-FW	20,228	187,534,255	CEO	225,390
				CFO	127,430
				CAO	158,622
				COO	137,792
				Chief Dev. Officer	133,872
				Managing Director (avg.)	130,260

Recommendation

While specific job responsibilities no doubt vary between the positions captured in the above data tables and the IDEA positions under consideration, the data tables are useful for comparison purposes and provide guidance to the Board as it considers the salaries of Chief Officers, Executive Directors and Regional Superintendents.

In order to take advantage of the IRS's rebuttable presumption that the salaries are reasonable and not in excess, the Board must take appropriate action to review and approve the compensation to be offered for each position. Again, the IRS has stated that an individual's compensation is presumptively reasonable if the Board has taken the following steps:

- 1) The Board obtained and relied on appropriate comparability data in making its determination;
- 2) The total compensation package was approved in advance by the Board, and no individuals who had an actual or potential conflict of interest with respect to the compensation arrangement participated in deliberations; and
- 3) The Board adequately and contemporaneously documented the basis for its determination.

And, in order to satisfy the heightened scrutiny of the TEA, the compensation must be expressly found by the Board of Directors to be in line with fair market value "*based on the individual's education, experience, prior salary history, the job duties actually performed, and what a typical person with similar skills, experience, and job duties would earn.*"

The Board's approval of compensation would be based upon consideration of the comparability data from GuideStar and TEA, which stated consideration and the comparability data should be included in the Board Minutes, as well as the Board's determination and finding that the salary is reasonable and not excessive. Specifically, we would also ask that the Board make the following finding:

The Board finds that the compensation provided to the _____ is fair, reasonable and not excessive and appropriately in line with the individual's education, experience, prior salary history, the job duties actually performed, and what a typical person with similar skills, experience, and job duties would earn.

At the time action is considered and taken, it will also be necessary that any Board member or officer of the charter school with an actual or potential conflict of interest refrain and file an affidavit of abstention from participating in the deliberations in order to fully avail IDEA of the IRS's rebuttable presumption of reasonableness. Accordingly, only a quorum of disinterested Board members should participate in the deliberations and possible action.

CONFIDENTIAL ATTORNEY - CLIENT COMMUNICATION

May 2020

Should you require further guidance regarding the above, or have any questions concerning the data presented, please do not hesitate to call or write.

/s/ SCHULMAN, LOPEZ, HOFFER & ADELSTEIN, LLP



IDEA Total Rewards 101

Board Member Review

IDEA Total Rewards Philosophy

Our scholars deserve the best to get to and through college, and we are on an ambitious path to reach 100,000 IDEA scholars by 2022. Our total rewards system aims to attract, motivate, and retain high-performing Team and Family members who will have a positive impact on teaching, learning, and student achievement. Our total rewards system includes monetary compensation, benefits, recognition programs, opportunities to grow and develop, and the opportunity to work within a community of high-performing professionals who share a commitment to our mission.

Given the core of our work is great teaching and leading, we prioritize investment in attracting and retaining strong teachers and principals in our classrooms and schools. While we must attract strong new talent to sustain our growth, we believe that the longer our Team and Family members remain at IDEA to grow and develop as IDEA professionals, the stronger our impact on scholars, families, and communities.

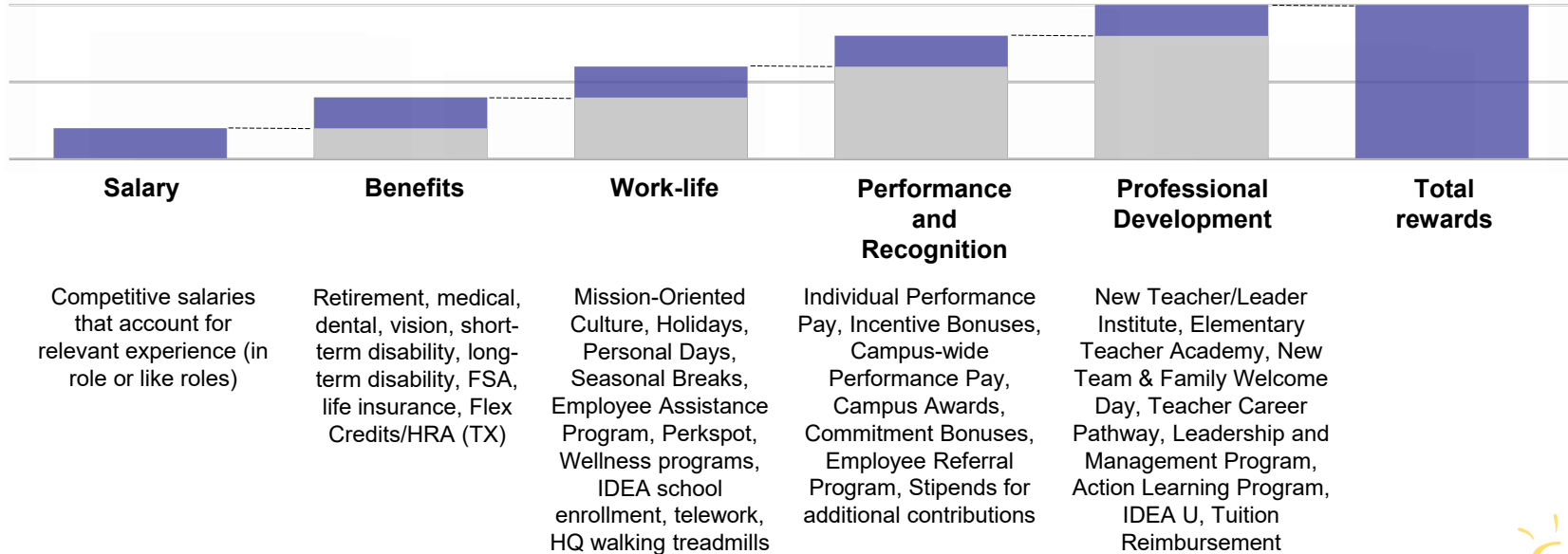
Therefore, within our available resources we aim to:

- 1) **Bring strong talent in the door by** providing salary ranges and benefits competitive with average school system, nonprofit, and for-profit markets based on bi-annual market analysis, with specific offers that take into account candidates' experience and education/skills critical to our success and include the promise of strong rewards and growth opportunities for high performers who stay. We absorb the ever-increasing cost of benefits in order to provide a free employee health care plan option for all staff and provide an additional safety net of benefits funds for full-time staff where funds are available.
- 2) **Ensure our teachers and principals are receiving total rewards packages near the top of their local talent markets** by updating local teacher market and cost of labor data annually, and prioritize resources for programs such as our Teacher Career Pathway and Commitment to School Leadership awards that promote the ability for our high-performing instructional leaders to continue their growth and rewards potential within these high-impact classroom and school leader roles.
- 3) **Invest in the ongoing success of our existing Team and Family members** through annual salary increases for team members staying in the same role which recognize merit and adjust for market competitiveness and internal equity, as well as providing a variety of professional development and internal promotion opportunities to support continuous performance and career growth. Our substantial bonus program rewards individual and team performance and longevity at IDEA at a level uncommon in our sector.

What structures do we have in place?

Total Rewards:

Programs, Practices, Elements, and Dimensions that collectively define our strategy to attract, motivate, and retain employees



IDEA-wide benchmarking approach

Teachers:

- Teacher scales are reviewed each year by comparing IDEA scales to competing schools in each region
- Benchmarked **annually**

All Other Roles:

- Engage with external consultants
- Collect and review job information
- CONTENT, not title
- Utilize published surveys to collect market data
- Benchmarked on a **2-year cycle**

Role of Bonuses in our Approach

Purpose:

- **Attract high-performing talent** to help us achieve our big goals with the promise of strong rewards and growth opportunities for high performers who stay
- **Invest in the ongoing success** of our existing Team and Family members by rewarding individual and team performance and longevity at IDEA at a level uncommon in our sector

Key Components:

- **Short-term Performance Incentives for all full-time staff**
 - Teacher Career Pathway: Teachers
 - Performance Pay: All Salaried Non-Teachers (% of salary)
 - Incentive Pay: All Non-Exempt Staff (\$ target for role)
- **Targeted Bonuses/Awards**
 - Student Achievement
 - Campus Achievement
 - Commitment Bonuses
 - Attendance Bonuses
 - Long-term Incentives for Executives

Executive Compensation Consulting Partner

2016, 2018 Studies



2020 Study (for 2021-22 and beyond)



SIGNIFICANT EDUCATION EXPERIENCE

We provide compensation consulting support to ~390 educational organizations.



PROVIDING INNOVATIVE SOLUTIONS

We develop solutions that are both original and practical, grounded in industry practices, and tailored to attract and retain the specific talent you require.



BEING A TRUSTED ADVISOR

We strive to build a long-term partnership with you, putting your interests first, challenging you appropriately, and "telling it like it is."



WORKING IN PARTNERSHIP

We structure our relationship such that our team works for the Board, taking direction and delivering our findings and recommendations, but working with management to understand the organization's business, financial, and human capital issues.

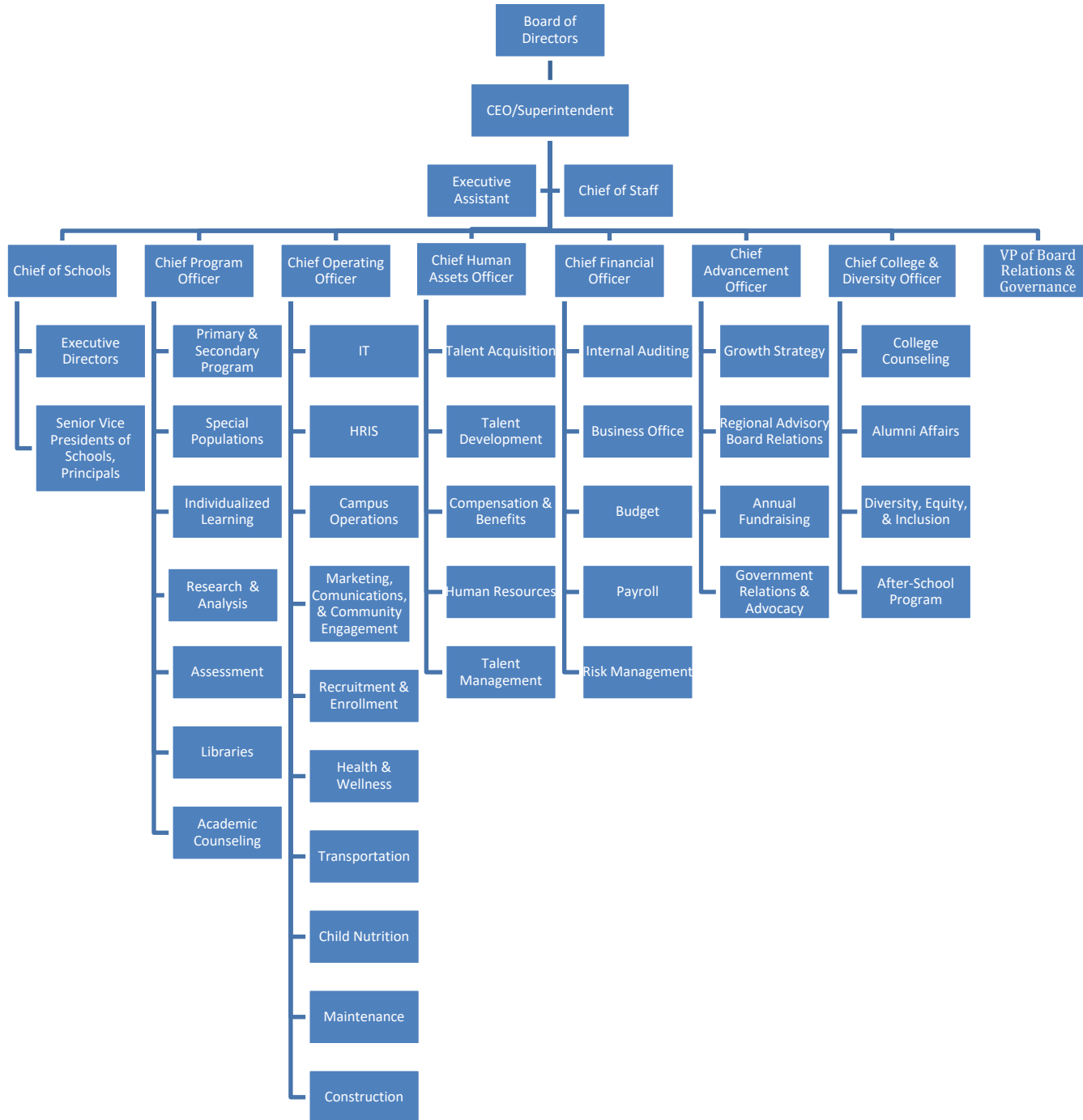


EDUCATING THE BOARD

Our approach takes the Board through a process to enable informed decisions.

Exhibit I

2020-21 IDEA Public Schools Organizational Chart



Round 1 - Goal Setting



Marisol Harris
Administrative Services Coordinator

GOAL SETTING OVERVIEW

It is IDEA's belief that the best practice is to start off the school year with a clear understanding of your goals and more importantly, how you plan to meet and/or achieve them. The Round 1 Goal Setting process has two parts. This is the purpose of IDEA's Staff Development Cycle, Round 1 Goal Setting.

Goal Setting is an opportunity for you and your manager to meet and discuss the goals for your core work and what success will look like for the year. Your goals around core work should advance the team's strategic priorities and align with the five organizational goals listed below.

2020-21 IDEA Organizational, Top 5 Goals:

1. 100% College Matriculation
2. IDEA Public Schools earns an "A" rating
3. 85% Teacher Retention | 85% Employee Retention
4. 83,520 Student Enrollment
5. \$134 MM Operating Income

Performance goals for all team members should align to your scorecard, essential responsibilities and functions, and/or the organizational goals. In most cases, this means that there is clear and strong alignment (though not necessarily verbatim) between scorecard accountabilities, core role or job function, and your identified performance goals. When goal setting, consider the contributions of your role individually, within your team, and to the organization as a whole.

Goal Setting for Teachers

If you are a Teacher, this section is for you!

Goal Setting is an opportunity for you and your manager to meet and discuss the goals for your core work as a teacher directly aligned to the Teacher Career Pathway (TCP) and clearly understand what success will look like for the year.

As a part of the goal setting process, Teachers will set performance and

Goal Setting - Self Review

For all other staff, this section is for you.

Goal Setting is an opportunity for you and your manager to meet and discuss the goals for your core work and what success will look like for the year. Your goals

Goal Setting - Manager Review

If you are a manager, this section is for you.

The goal setting task allows each manager and their direct reports to understand their work and performance for the year along with clear expectations and alignment to their team,

development goals.

NEXT STEPS FOR YOU TO COMPLETE:

1. If you are new to the goal setting process OR want support from your manager prior to setting your goals, please connect with them directly. You can also complete the Teacher goal setting session in [Roadmap](#).
2. Familiarize yourself with the TCP resources below:
 - a. [TCP Development Goal Guide](#)
 - b. [Teacher Career Pathway HUB page](#)
 - c. [TCP 2020-21 Handbook](#)
 - d. [TCP Placement Calculator](#)
 - e. [2020-21 Rubric Guidance](#)
3. Open and review the [TCP Development Goal Guide](#) to support you in setting your goals with strong exemplars and details.
4. Log into [Cornerstone](#) or open Cornerstone directly through the [HUB](#).
5. After you complete entering your goals, click **SUBMIT** to ensure your goals are finalized. Please note that your manager will not be able to access your goals until you click SUBMIT.

For any questions or support regarding the TCP, please email
tcp@ideapublicschools.org or
Alexandria.Saldivar@ideapublicschools.org

around core work should advance the team's strategic priorities and align with the five organizational goals listed above.

As a part of the goal setting process, staff members will set performance and development goals.

NEXT STEPS FOR YOU TO COMPLETE

1. If you are new to the goal setting process OR want support from your manager prior to setting your goals, please connect with them directly. You can also complete the goal setting for staff session in [Roadmap](#).
2. Familiarize yourself with the [SMART goal framework](#) and [Goals Library guidance](#).
3. Log into [Cornerstone](#) or open Cornerstone directly through the [HUB](#).
4. After you complete entering your goals, click **SUBMIT** to ensure your goals are finalized. Please note that your manager will not be able to access

department/function, and org wide goals.

As managers, we want to ensure that we are holding our team members accountable to goals and the aligned strategies most key to their work. Goal setting ensures that their performance and rewards are anchored in the accomplishment of those goals.

NEXT STEPS FOR YOU TO COMPLETE

1. If you are new to the goal setting manager review process, please complete the goal setting for managers session in [Roadmap](#).
2. Ensure that all of your direct reports have submitted their goal setting forms before you attempt to review. If a direct report has not submitted their form, it will not show up on your Cornerstone dashboard.
3. Log into [Cornerstone](#) or open Cornerstone directly through the [HUB](#).
4. Complete your Manager Reviews

your goals until
you click SUBMIT.

5. After you complete your Manager approvals for all of your direct reports, click **SUBMIT** to ensure goals are finalized.

How-To-Guides

1. Click [here](#) to access your How-to-guide to complete your Manager-Review task.
2. Click [here](#) to access the How-to-Edit-Your Direct Report(s) Goals.
3. Click [here](#) to access the How-to-Print and Save your Goal Setting task.
4. **Click here to access a step-by-step video that will help guide you through your manager review tasks for your direct reports. (COMING SOON)**

How-To-Guides

1. Click here to access the How-to-guide to complete your Self-Review task. **(COMING SOON)**
2. Click [here](#) to access the How-to-Edit Goals Guide.
3. Click [here](#) to access the How-to-Add Goals from Library Guide.
4. Click [here](#) to access the How-to-Print and Save your Goal Setting task.
5. **Click here to access a step-by-step video that will help guide you through this process. (COMING SOON)**

If you have any questions about Cornerstone email: **cornerstone@ideapublicschools.org**.

If you have any questions about the goals process email:
talentmanagement@ideapublicschools.org.


Self-Review: 2019-2020 Goal Setting for Campus Leaders

Overview

2019-2020 Part 1: Set Dri...

2019-2020 Part 2 - Devel...

2019-20 Goal Setting for Campus Leaders



Employee Name
Position
7/1/2019 - 6/30/2020

0%

Overview

OVERVIEW:

A best practice is to start off the school year with a clear understanding of your goals and more importantly, how you plan to meet and/or achieve them. This is the purpose of Round 1 of IDEA's Staff Development Cycle - Goal Setting.

Goal Setting is an opportunity for you and your manager to meet and discuss the goals for your core work and what success will look like for the year. Your goals around core work should advance the team's strategic priorities and align with the five organizational goals listed below.

2019-2020 IDEA Organizational, Top 5 Goals:

1. 100% College Matriculation
2. IDEA Public Schools earns an "A" rating
3. 85% Teacher Retention | 85% Employee Retention
4. 63,780 Student Enrollment for 2020-21 School Year
5. \$110.5 Million in Operating Income

COVID-19 ADJUSTED GOALS

2019-2020 IDEA Organizational, Top 5 Goals:

1. 100% College Matriculation
2. **96% of Students from first day of Distance Learning persist with us into the 2020-21 School Year**
3. 85% Teacher Retention | 85% Employee Retention
4. 63,780 Student Enrollment for 2020-21 School Year
5. \$110.5 Million in Operating Income

Goal Setting has two parts. Complete these both before your Round 1 conversation with your manager.

Click the "Get Started" button below to begin this process!

Please contact cornerstone@ideapublicschools.org with any questions regarding your Round 1: Goal Setting form.

Review Step Progression

Self Review

Manager Review

Get Started

2019-20 Goal Setting for Campus Leaders

Overview

2019-20 Part 1: Set Dri...

2019-20 Part 2 - Devel...

Employee Name

Position

7/1/2019 - 6/30/2020

0%

2019-20 Part 1: Set Driving Goals

Add Goals

PART 1: Set Driving Goals

Part I:
Identify 5 driving goals for the year that align to district goals.

Part II:
Select personal development goals.

In this part, you will identify 5 driving goals for the upcoming school year that align to district goals, as well as 2-3 strategies to reach each goal.

To begin, click **Add Goals** at the top right.

Then, follow the steps below.

Create Goals

Wizard Library

All fields marked "*" are required

Goal *

Start Date * Due Date *

Type of Goal * Category

High Impact Strategy (enter at least 2) *

Related Attachments

Choose file

Cancel Save

2. Edit the goal (if needed)

3. Enter "Campus Lead Team" and "Bonusable."

4. Explain two strategies to reach the goal (1-3 sentences each)

5. Save, and then repeat the process for remaining goals.

1. Open the list of goals in the library (You can filter the list by role). If desired, use the Wizard to check if the goal is SMART.

After entering your 5 goals, click **Save and Continue** below.

Title of Goals

Status: Completed

Start Date: 7/1/2019

Due Date: 6/30/2020

more...

Cancel Goal

Comments:

B I U S x x T

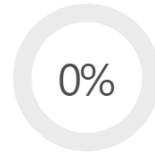
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2019-20 Goal Setting for Campus Leaders

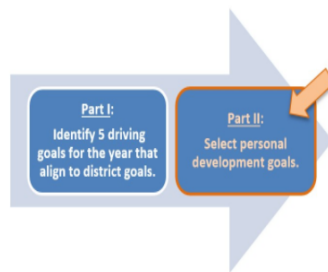
- Overview
- 2019-20 Part 1: Set Dri...
- 2019-20 Part 2 - Devel...



Employee Name
Position
7/1/2019 - 6/30/2020



2019-20 Part 2 - Development Goals



In this part, you will identify personal development goals from the School Leadership Levers and/or Leadership Competencies, as well as strategies to reach each goal. For example, you might write...

1. "An area where I would like to focus my development for the year is ____ because _____. A strategy I plan to use to support my development in this area is _____. As my manager, you can support me by _____."
2. "I do not feel I am as strong as I could be in ____ and would like to do ____ to address it. It would help me if you could ____ to support my growth in this area."

Find your role in the chart below for additional instructions. When you finish, click 'submit'.

Links:

- [Leadership Competencies \(LCs\)](#)
- [School Leadership Levers \(SLLs\)](#)
- Chart showing which [SLLs apply to non-instructional lead team roles](#) (see rows listed with a "1")

- Overview
- 2019-20 Part 1: Set Dri...
- 2019-20 Part 2 - Devel...

Role	Development Goals
ACs CCs DCCs	<ul style="list-style-type: none">• Select 2-3 Leadership Competencies to develop• Also select 2-3 School Leadership Lever rows to develop<ul style="list-style-type: none">◦ Note: For assistance in selecting SLLs, see the chart (link above) that lists a "1" for each SLL that directly connects to the AC, CC, and DCC roles.
APIs	<ul style="list-style-type: none">• Select 2-3 SLLs to develop• Note: New APIs may want to select from the SLLs taught at Coaching Academy:<ul style="list-style-type: none">◦ 1C Lead Data Conversations (DI Leaders)◦ 1D Student Work Analysis (Non-DI Leaders)◦ 2A Observing Classroom Instruction◦ 2B Observation Feedback Meetings◦ 2C Follow Up & Coach to Master◦ 3B Evaluate Lesson Plans◦ 8B Organize Time & Tasks
APOs	<ul style="list-style-type: none">• Select 2-3 SLLs to focus on developing• Note: For assistance in selecting rows, see the chart (link above) that lists a "1" for each SLL that directly connects to the APO role.

Overview

2019-20 Part 1: Set Dri...

2019-20 Part 2 - Devel...

PIRs	<ul style="list-style-type: none">Select 2-3 SLLs as development areasNote: You can select SLLs from your ILP, including those that you especially want your manager's help developing.
Principals	<ul style="list-style-type: none">Select 2-3 SLLs to focus on developing

Development Goal 1 and Strategies to Achieve

Comments:

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Development Goal 2 and Strategies to Achieve

Comments:

Manager-Review: 2019-2020 Goal Setting for Campus Leaders

2019-20 Goal Setting for Campus Leaders



Overview



2019-20 Part 1: Set Dri...



2019-20 Part 2 - Devel...



Employee Name

Position

7/1/2019 - 6/30/2020

0%

Overview

OVERVIEW:

A best practice is to start off the school year with a clear understanding of your goals and more importantly, how you plan to meet and/or achieve them. This is the purpose of Round 1 of IDEA's Staff Development Cycle - Goal Setting.

Goal Setting is an opportunity for you and your manager to meet and discuss the goals for your core work and what success will look like for the year. Your goals around core work should advance the team's strategic priorities and align with the five organizational goals listed below.

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3. 85% Teacher Retention | 85% Employee Retention
4. 63,780 Student Enrollment for 2020-21 School Year
5. \$110.5 Million in Operating Income

Goal Setting has two parts. Complete these both before your Round 1 conversation with your manager.

Click the "Get Started" button below to begin this process!

Please contact cornerstone@ideapublicschools.org with any questions regarding your Round 1: Goal Setting form.

Review Step Progression



Self Review



Manager Review

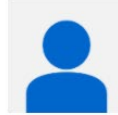


Reopen Step

Get Started

2019-20 Goal Setting for Campus Leaders

- Overview
- 2019-20 Part 1: Set Driving...
- 2019-20 Part 2 - Devel...



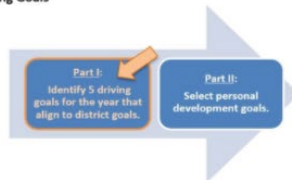
Employee Name
Position
7/1/2019 - 6/30/2020

0%

2019-20 Part 1: Set Driving Goals

Add Goals

PART 1: Set Driving Goals



In this part, you will identify 5 driving goals for the upcoming school year that align to district goals, as well as 2-3 strategies to reach each goal.

To begin, click **Add Goals** at the top right.

Then, follow the steps below.

After entering your 5 goals, click **Save and Continue** below.

Title of Goals

Status: Completed

Start Date: 7/1/2019

Due Date: 6/30/2020

[more...](#)

Cancel Goal

Comments:

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2019-20 Goal Setting for Campus Leaders

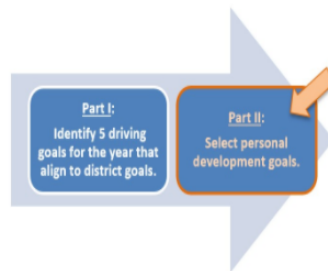
- Overview
- 2019-20 Part 1: Set Dri...
- 2019-20 Part 2 - Devel...



Employee Name
Position
7/1/2019 - 6/30/2020

0%

2019-20 Part 2 - Development Goals



In this part, you will identify personal development goals from the School Leadership Levers and/or Leadership Competencies, as well as strategies to reach each goal. For example, you might write...

1. "An area where I would like to focus my development for the year is ____ because _____. A strategy I plan to use to support my development in this area is _____. As my manager, you can support me by _____."
2. "I do not feel I am as strong as I could be in ____ and would like to do ____ to address it. It would help me if you could ____ to support my growth in this area."

Find your role in the chart below for additional instructions. When you finish, click 'submit'.

- Overview
- 2019-20 Part 1: Set Dri...
- 2019-20 Part 2 - Devel...

Development Goal 1 and Strategies to Achieve

Comments:

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Font Size


Development Goal 2 and Strategies to Achieve


Comments:


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Font Size


 Overview

 2019-20 2x2 Part I HQ...

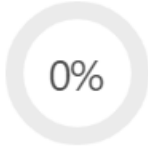
 2019-20 2x2 Part II HQ...

 2019-20 2x2 Part III H...

2019-20 2x2 HQ, National, Regional, and Leaders



Employee Name
Position
7/1/2019 - 6/30/2020





Overview

Our Staff Development Cycle outlines three rounds of conversations that provide staff opportunities to engage in formal development dialogue with their managers. It allows each employee to reflect on their work and discuss their goals and performance with their manager over the course of the year. These conversations should supplement, not replace, the other ongoing professional development interactions with managers, such as informal coaching, classroom observations, data conversations, and weekly check-ins.


The 2x2 conversation is the second round of the Staff Development Cycle. The 2x2 conversation is an opportunity for staff members and managers to give and receive feedback from each other to improve job performance and satisfaction. The exercise is an opportunity to reflect, celebrate, plan how to capitalize on your strengths and how to grow in areas of development. During the conversation, the staff member and manager identify two strengths and two opportunities for improvement for themselves and for each other using common frameworks. Staff members can use the [Manager Feedback Framework](#) to give managers feedback about strengths and growth areas. All managers prepare a similar form that identifies strengths and growth areas for themselves and their direct report. Each identification of strengths and growth areas should be accompanied by specific examples and concrete evidence. Staff members and managers should both leave 2x2 conversations with a clear and aligned understanding of the shared action plan for the remainder of the year.

Please contact Elise.Gilbert@ideapublicschools.org for any questions in regards to your 2x2 conversation and Cornerstone@ideapublicschools.org for any support regarding your 2x2 task.

Review Step Progression

 Manager Review 2x2 

Self-Review 2x2



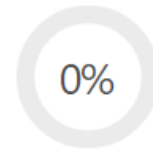
[Get Started](#)

- Overview
- 2019-20 2x2 Part I HQ...
- 2019-20 2x2 Part II HQ...
- 2019-20 2x2 Part III H...

2019-20 2x2 HQ, National, Regional, and Leaders



Employee Name
Position
7/1/2019 - 6/30/2020



2019-20 2x2 Part I HQ, Regional, National, and Leaders: Self-Review

Please rate your overall satisfaction in your current role thus far.

Select *

How likely are you to return to IDEA Public Schools next school year?

Select *

Based on your likelihood of return, do you see yourself in the/a _____.

Select *

Would you like to connect with a member of the HA Team regarding transfer/promotion interest?

Select *

We value your future interests at IDEA. In 2-5 years, you see yourself as/in _____.

Select ▼ *

- What 2 things do you enjoy in your role that you would like to continue this year and into next year?
- What 2 things would you like to change or adjust in your role this year and into next year?

Comments:

B I U S x_o x^o I_x [List Bulleted] [List Numbered] [Text Left] [Text Right] [Text Center] [Text Justify] [Font] Size A+ A-

[Undo] [Redo] [Cut] [Copy] [Paste] [Insert Link] [Insert Image] [Table]

- What challenges or gaps are you facing in your current role around which you would like to grow and develop?
- How does this gap or challenge impact your desire to persist or remain with IDEA?
- What can your manager do to support?

Comments:

B I U S x_o x^o I_x [List Bulleted] [List Numbered] [Text Left] [Text Right] [Text Center] [Text Justify] [Font] Size A+ A-

- How can we continue to improve your experience at IDEA?

Comments:

B I U S x_o x^o I_x [List Bulleted] [List Numbered] [Text Left] [Text Right] [Text Center] [Text Justify] [Font] Size A+ A-

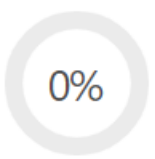
[Undo] [Redo] [Cut] [Copy] [Paste] [Insert Link] [Insert Image] [Table]

- Overview
- 2019-20 2x2 Part I HQ...
- 2019-20 2x2 Part II HQ...
- 2019-20 2x2 Part III H...

2019-20 2x2 HQ, National, Regional, and Leaders



Employee Name
Position
7/1/2019 - 6/30/2020



2019-20 2x2 Part II HQ, Regional, National, and Leaders: Self-Review

Part II: Self-Review

- Share your top two strengths and two opportunities for growth
- Use the table below to determine the correct rubric and actions
- Click "Save and Continue" when you are finished

Role	Resources for 2x2 Self-Review
API, PIR, Principal, APO	Rubric: School Leadership Levers (link here) <ul style="list-style-type: none">• Consider ratings and feedback you have received throughout the year
Counselors	Rubric: Leadership Competencies (link here) <ul style="list-style-type: none">• Consider ratings and feedback you have received throughout the year
Admin Assistant, Other Campus Leaders, Campus School Ops, HQ Staff	Rubric: Leadership Competencies (link here) <ul style="list-style-type: none">• Consider feedback you have received throughout the year

- Overview
- 2019-20 2x2 Part I HQ...
- 2019-20 2x2 Part II HQ...
- 2019-20 2x2 Part III H...

- Identify your top two strengths and provide specific evidence of these strengths in action.
- Then include the concrete next steps you will take to capitalize on these strengths for the rest of the year.
- What help do you need from your manager? (Be specific. Example: I would like my manager to give me one stretch opportunity in the next semester where I get to flex this strength. Non-example: I need my manager to check in with me every week.)

Comments:

Rich text editor toolbar with icons for Bold, Italic, Underline, Strikethrough, Text Color, Background Color, Bulleted List, Numbered List, Indent, Outdent, Link, Unlink, Font, Size, and text color selection. Below the toolbar is a large text area for comments.

- Identify your top two opportunities for growth and provide specific evidence.
- Then include the concrete next steps you will take to improve in each growth area for the rest of the year.
- What help do you need from your manager? (Be specific. Example: I need my manager to observe me at my next parent meeting where I deliver difficult news and provide feedback on how I shared it, how I responded to questions, and where I could have improved. Non-example: I need my manager to check in with me every week.)

Comments:

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2019-20 2x2 HQ, National, Regional, and Leaders

- Overview
- 2019-20 2x2 Part I HQ...
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- 2019-20 2x2 Part III H...



Employee Name
Position
7/1/2019 - 6/30/2020

0%

2019-20 2x2 Part III HQ, Regional, National, and Leaders: Manager Feedback

Part III: Manager Feedback

- Share feedback on your manager's top two strengths and top two opportunities for growth.
- Use the [Manager Feedback Framework](#) as a guideline for feedback.
- Click "Submit" when you are finished. This will finalize the form and send a message to your manager that your form is available for review.

- Identify your manager's top two strengths and provide specific evidence of these strengths in action.
- Then include the concrete actions you believe your manager can take to capitalize on these strengths as your manager for the rest of the year.
- Tip: Use this sentence stem when sharing evidence: "When you _____, the impact on me is _____."

Comments:

Rich text editor toolbar with options: Source, Bold, Italic, Underline, Strikethrough, Text color, Background color, Bulleted list, Numbered list, Indent, Outdent, Link, Unlink, Image, Table, and Font/Size dropdowns.

Characters: 0

- Overview
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- 2019-20 2x2 Part III H...

- Identify your manager's top two opportunities for growth and provide specific evidence of these growth areas in action.
- Then include the concrete actions you believe your manager can take to improve in each growth area as your manager for the rest of the year.
- Tip: Use this sentence stem when sharing evidence: "When you _____, the impact on me is _____."

Comments:

Rich text editor toolbar with options: Source, Bold, Italic, Underline, Strikethrough, Text color, Background color, Bulleted list, Numbered list, Indent, Outdent, Link, Unlink, Image, Table, and Font/Size dropdowns.


Overview

2019-20 2x2 Part I for ...

2019-20 2x2 Part II for ...

2019-20 2x2 Part III for...

2019-20 2x2 HQ, National, Regional, and Leaders



Employee Name
Position
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0%

Overview

Our Staff Development Cycle outlines three rounds of conversations that provide staff opportunities to engage in formal development dialogue with their managers. It allows each employee to reflect on their work and discuss their goals and performance with their manager over the course of the year. These conversations should supplement, not replace, the other ongoing professional development interactions with managers, such as informal coaching, classroom observations, data conversations, and weekly check-ins.

The 2x2 conversation is the second round of the Staff Development Cycle. The 2x2 conversation is an opportunity for staff members and managers to give and receive feedback from each other to improve job performance and satisfaction. The exercise is an opportunity to reflect, celebrate, plan how to capitalize on your strengths and how to grow in areas of development. During the conversation, the staff member and manager identify two strengths and two opportunities for improvement for themselves and for each other using common frameworks. Staff members can use the [Manager Feedback Framework](#) to give managers feedback about strengths and growth areas. All managers prepare a similar form that identifies strengths and growth areas for themselves and their direct report. Each identification of strengths and growth areas should be accompanied by specific examples and concrete evidence. Staff members and managers should both leave 2x2 conversations with a clear and aligned understanding of the shared action plan for the remainder of the year.

Please contact Elise.Gilbert@ideapublicschools.org for any questions in regards to your 2x2 conversation and Cornerstone@ideapublicschools.org for any support regarding your 2x2 task.

Review Step Progression

✓

Manager Review 2x2

✓

Self-Review 2x2

✓

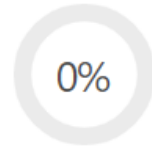
Get Started

- Overview
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- 2019-20 2x2 Part II for ...
- 2019-20 2x2 Part III for...

2019-20 2x2 HQ, National, Regional, and Leaders



Employee Name
Position
7/1/2019 - 6/30/2020



2019-20 2x2 Part I for Leaders: Manager Review

During the annual Talent Review process this year, what rating did you assign this direct report?

Select *

Based on their most recent performance, how would you rate this direct report?

Select *

How has your rating changed for this direct report since the Talent Review?

Select *

Back

Next

2019-20 2x2 HQ, National, Regional, and Leaders

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- 2019-20 2x2 Part I for ...
- 2019-20 2x2 Part II for ...
- 2019-20 2x2 Part III for...



Employee Name
Position
7/1/2019 - 6/30/2020

0%

2019-20 2x2 Part II for Leaders: Manager Self-Review

Part II: Manager Self-Review:

- Reflect on your top two strengths and top two opportunities for growth as a manager.
- Use the [Manager Feedback Framework](#) as a guideline for self-reflection
- Click "Save and Continue" when you are finished.

- Identify your top two strengths as a manager and provide specific evidence of these strengths in action.
- Then include the concrete next steps you will take to capitalize on these strengths for the rest of the year.

Comments:

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- Overview
- 2019-20 2x2 Part I for ...
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- 2019-20 2x2 Part III for...

- Identify your top two opportunities as a manager for growth and provide specific evidence.
- Then include the concrete next steps you will take to improve in each growth area for the rest of the year.

Comments:

Rich text editor toolbar with options: Bold (B), Italic (I), Underline (U), Strikethrough (ABC), Bulleted List (List), Numbered List (List), Indent (List), Outdent (List), Font (dropdown), Size (dropdown), Text Color (A), Background Color (A), Undo (undo), Redo (redo), Link (link), Unlink (link), Table (table), and a large text input area.

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2019-20 2x2 HQ, National, Regional, and Leaders

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Employee Name
Position
7/1/2019 - 6/30/2020

0%

2019-20 2x2 Part III for Leaders: Direct Report Feedback

Part III: Direct Report Feedback

- Share feedback on your direct report's top two strengths and two opportunities for growth
- Use the table below to determine the correct rubric and actions
- Click "Save and Continue" when you are finished

Role	Resources for 2x2 Direct Report Feedback
API, PIR, Principal, APO	Rubric: School Leadership Levers (link here) <ul style="list-style-type: none">• Consider ratings and feedback you have given direct report throughout the year
Counselors	Rubric: Leadership Competencies (link here) <ul style="list-style-type: none">• Consider ratings and feedback you have given direct report throughout the year
Admin Assistant, Other Campus Leaders, Campus School Ops, HQ Staff	Rubric: Leadership Competencies (link here) <ul style="list-style-type: none">• Consider feedback you have given direct report throughout the year

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- 2019-20 2x2 Part III for ...

- Identify this employee's top two strengths and provide specific evidence of these strengths in action.
- Then include the concrete actions you believe this employee can take to capitalize on these strengths for the rest of the year.
- Tip: Use this sentence stem when sharing evidence: "When you _____, the impact is _____."

Comments:

[illegible]

- Identify this employee's top two opportunities for growth and provide specific evidence of these growth areas in action.
- Then include the concrete actions you believe this employee can take to improve in each growth area for the rest of the year.
- Tip: Use this sentence stem when sharing evidence: "When you _____, the impact is _____."

Comments:

Staff Development Cycle

2x2



What is the Staff Development Cycle?

Opportunity to engage in formal development conversations with their managers to drive performance.

- Reflect on their and discuss goals and performance with your manager over the course of the year.
- Conversations supplement, not replace, the other ongoing professional development interactions with managers, such as informal coaching, classroom observations, data conversations, and weekly check-ins.



What is the 2x2?



Staff Member and Manager identify **2 strengths** and **2 opportunities for improvement** for themselves and for each other using common frameworks.

- reflect, celebrate, and plan to capitalize on your strengths
- reflect and intentionally plan how to grow in areas of development
- staff members and managers will leave 2x2 conversations with a clear action plan for the remainder of the year.

Staff Member Outcomes:

- Clear understanding of what **doing well** that should **continue** to do to lead to most positive outcomes
- Clear understanding of **prioritized next steps** for development


Manager Outcomes:


- Clear understanding of **what they are doing well in support** of their direct reports so they **continue** doing it
- Clear on what specific areas they can **adjust** to ensure support is having a **more positive impact** on direct reports' development


2x2 Conversation Agenda


Approx. Time	Action
2-5 min	1. Manager: Sets the stage for the conversation
15-20 min	2. Manager: Shares his/her own 2 strengths and 2 opportunities for growth with supporting examples based on “Manager Feedback Framework.”
	3. Employee: Shares 2 strengths and 2 opportunities for growth based on “Manager Feedback Framework.”
15-20 min	4. Employee: Shares his/her own 2 strengths and 2 growth areas with supporting examples based on self-ratings.
	5. Manager: Provides feedback on direct report’s reflection. Then, manager shares 2 strengths and 2 opportunities for growth with supporting examples with direct report based on ratings.
10-15 min	6. Manager and Employee Share action steps based on feedback.


Self-Review:2019-2020 APR for Campus Leaders

 Overview


 2019-2020 Self-Review...

 2019-2020 Part 2: Non...

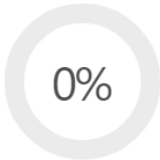
 2019-2020 Part 3: SLL ...

 Summary

2019-2020 APR Campus Leaders



Employee Name
Position
7/1/2019 - 6/30/2020




Overview


At IDEA, our Staff Development Cycle is a formal mechanism to engage in receiving and providing feedback about growth and development at IDEA, in addition to the feedback received throughout the year via coaching conversations and check-ins. IDEA's Annual Performance Review is an opportunity for managers and staff members to discuss the staff member's year-long performance using evidence gathered from observations, coaching conversations, action plans, previous rounds of the Staff Development Cycle, goal achievement and competency ratings on staff member's respective rubric.


For productive conversations, both manager and direct report need to complete this form prior to having the Annual Performance Review meeting/conversation.

Contact us at Cornerstone@ideapublicschools.org for any questions or additional technical support.
Here's a quick guide on how to fill out your Round 3 forms, [Click Here](#)

Review Step Progression

 Manager Review

 Self Review




2019-2020 APR Campus Leaders

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- Summary



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Position
7/1/2019 - 6/30/2020



0%

2019-2020 Self-Review Part 1: Bonusable Goals & Summary

Select **"Goal Met"** for each goal you successfully met this year. If you did not meet a goal OR if you are still waiting for final data for the goal (i.e. matriculation, persistence or retention), select **"Goal Not Met or Goal Pending"**.

Managers will have a chance to review the list of **"Goal Not Met or Goal Pending"** goals and indicate any that were met before performance pay is paid out in the fall.

In the comments section below each bonusable goal, you **MUST PROVIDE** goal evidence or relevant context.

If you adjusted goals due to COVID-19, rationale for the goal adjustment must be provided.

Title of Goals

Status: Completed
Start Date: 7/1/2019
Due Date: 6/30/2020
[more...](#)

Select

?

Comments:

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ANNUAL PERFORMANCE REVIEW SUMMARY

Reflect on your top strengths and areas of growth throughout the year. Please identify at least one strength and one area of growth.

How can you continue to improve on these areas for next school year?

Comments:

B *I* U ~~S~~ \times_2 \times^2 I_x | $\frac{1}{2}$ $\frac{3}{4}$ $\frac{1}{4}$ $\frac{3}{8}$ | $\frac{1}{2}$ $\frac{3}{4}$ $\frac{1}{4}$ $\frac{3}{8}$ | $\frac{1}{2}$ $\frac{3}{4}$ $\frac{1}{4}$ $\frac{3}{8}$ | Font Size A A

ABC ↶ ↷ ✂ 📄 📋 📌 📎 📏 📐

How can you continue to improve on these areas for next school year?

STAFF MEMBER PLANS

Are you planning on returning to IDEA next year? If yes, in what position?


Where do you see yourself in 2-5 years at IDEA Public Schools?


Comments:

B *I* U ~~S~~ x_a x^a I_x


Where do you see yourself in 2-5 years at IDEA Public Schools?


2019-2020 APR Campus Leaders

 Overview

 2019-2020 Self-Review...

 2019-2020 Part 2: Non...

 2019-2020 Part 3: SLL ...

 Summary



Employee Name

Position

7/1/2019 - 6/30/2020

0%

2019-2020 Part 2: Non-Bonusable Goals

Select **"Goal Met"** for each goal successfully met this year. If goal was not met OR if final data for the goal is still pending (i.e. matriculation, retention or persistence), select **"Goal Not Met or Goal Pending"**.

Title of Goals 

Status: Completed

Start Date: 7/1/2019

Due Date: 6/30/2020

[more...](#)

Select 



Comments:

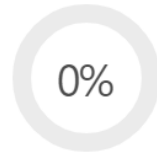


2019-2020 APR Campus Leaders

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Employee Name
Position
7/1/2019 - 6/30/2020



2019-2020 Part 3: SLL Evaluation

Rate yourself on the SLLs you focused on this year, including those you identified during Goal Setting in the fall.

Managers of instructional leaders: rate your direct reports on the SLLs they focused on this year, including those identified during Goal Setting in the fall.

[Click here to view the 2019-20 School Leadership Levers.](#)



LEVER 1: DATA DRIVEN INSTRUCTION

(1A) Make School Level Data-Driven Decisions *

N/A
☐

Novice
☐

Developing
☐

Proficient
☐

Advanced
☐

[Rating History](#)

(1B) Track and Manage Data *

N/A
☐

Novice
☐

Developing
☐

Proficient
☐

Advanced
☐

[Rating History](#)

(1C) Conduct Data Conversations *

N/A
☐

Novice
☐

Developing
☐

Proficient
☐

Advanced
☐

[Rating History](#)

(1D) Lead Student Work Analysis Meetings *

N/A
☐

Novice
☐

Developing
☐

Proficient
☐

Advanced
☐

- Overview
 - 2019-2020 Self-Review...
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 - Summary

LEVER 2: OBSERVATION & FEEDBACK

(2A) Conduct Classroom Observations *

N/A

Novice

Developing

Proficient

Advanced

Rating History

(2B) Lead Observation Feedback Meetings *

N/A

Novice

Developing

Proficient

Advanced

Rating History

(2C) Follow Up & Coach to Mastery *

N/A

Novice

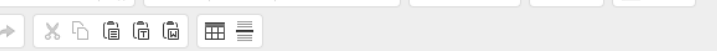
Developing

Proficient

Advanced

Rating History

Comments:



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- Summary

LEVER 3: PROGRAM & PLANNING

(3A) Coach Unit / Module Unpacking *

N/A

Novice

Developing

Proficient

Advanced

[Rating History](#)

(3B) Evaluate Lesson Plans *

N/A

Novice

Developing

Proficient

Advanced

[Rating History](#)

(3C) Pass a DI Check Out. *

N/A

Novice

Developing

Proficient

Advanced

[Rating History](#)

Comments:

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ABC **←** **→** **✂** **📄** **📂** **📁** **📧** **📧**



Overview



2019-2020 Self-Review...



2019-2020 Part 2: Non...



2019-2020 Part 3: SLL ...



Summary

LEVER 4: STUDENT CULTURE

(4A) Share a Compelling Recruitment Message *

N/A
☐

Novice
☐

Developing
☐

Proficient
☐

Advanced
☐

[Rating History](#)

(4B) Set Vision for Culture of Achievement *

N/A
☐

Novice
☐

Developing
☐

Proficient
☐

Advanced
☐

[Rating History](#)

(4C) Design Behavior Management System & Culture Rubric *

N/A
☐

Novice
☐

Developing
☐

Proficient
☐

Advanced
☐

[Rating History](#)

(4D) Monitor Student Culture *

N/A
☐

Novice
☐

Developing
☐

Proficient
☐

Advanced
☐

[Rating History](#)

(4E) Prevent & Respond to Misbehavior *

N/A
☐

Novice
☐

Developing
☐

Proficient
☐

Advanced
☐

[Rating History](#)

Comments:

- Overview
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LEVER 5: STAFF CULTURE & DEVELOPMENT					
(5A) Interview & Select Staff *					
N/A	Novice	Developing	Proficient	Advanced	Rating History
<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	
(5B) Onboard New Hires *					
N/A	Novice	Developing	Proficient	Advanced	Rating History
<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	
(5C) Lead Staff Development Cycle *					
N/A	Novice	Developing	Proficient	Advanced	Rating History
<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	
(5D) Make Ongoing Staffing Decisions *					
N/A	Novice	Developing	Proficient	Advanced	Rating History
<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	
(5E) Lead Effective PD *					
N/A	Novice	Developing	Proficient	Advanced	Rating History
<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	
(5F) Build Trust & Team *					
N/A	Novice	Developing	Proficient	Advanced	Rating History
<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	

Comments:



Overview



2019-2020 Self-Review...



2019-2020 Part 2: Non...



2019-2020 Part 3: SLL ...



Summary

LEVER 6: LEADING OTHER LEADERS

(6A) Coach & Manage Leaders *

N/A

Novice

Developing

Proficient

Advanced

[Rating History](#)

(6B) Lead Instructional Rounds *

N/A

Novice

Developing

Proficient

Advanced

[Rating History](#)

(6C) Facilitate Daily Huddles *

N/A

Novice

Developing

Proficient

Advanced

[Rating History](#)

(6D) Facilitate Weekly Tacticals *

N/A

Novice

Developing

Proficient

Advanced

[Rating History](#)

(6E) Facilitate Strategy Meetings *

N/A

Novice

Developing

Proficient

Advanced

[Rating History](#)

(6F) Facilitate Stepback Meetings *

N/A

Novice

Developing

Proficient

Advanced

[Rating History](#)

Comments:

(7A) Share School Vision *

Advanced ☐

Rating History

Advanced
☐

Rating History

Advanced ☐

Rating History

B *I* U ~~S~~ x_2 x^2 T_x $\frac{1}{2}$ $\frac{3}{4}$ $\frac{5}{8}$ $\frac{7}{16}$ $\frac{9}{32}$ $\frac{11}{64}$ $\frac{13}{128}$ $\frac{15}{256}$ $\frac{17}{512}$ $\frac{19}{1024}$ $\frac{21}{2048}$ $\frac{23}{4096}$ $\frac{25}{8192}$ $\frac{27}{16384}$ $\frac{29}{32768}$ $\frac{31}{65536}$ $\frac{33}{131072}$ $\frac{35}{262144}$ $\frac{37}{524288}$ $\frac{39}{1048576}$ $\frac{41}{2097152}$ $\frac{43}{4194304}$ $\frac{45}{8388608}$ $\frac{47}{16777216}$ $\frac{49}{33554432}$ $\frac{51}{67108864}$ $\frac{53}{134217728}$ $\frac{55}{268435456}$ $\frac{57}{536870912}$ $\frac{59}{1073741824}$ $\frac{61}{2147483648}$ $\frac{63}{4294967296}$ $\frac{65}{8589934592}$ $\frac{67}{17179869184}$ $\frac{69}{34359738368}$ $\frac{71}{68719476736}$ $\frac{73}{137438953472}$ $\frac{75}{274877906944}$ $\frac{77}{549755813888}$ $\frac{79}{1099511627776}$ $\frac{81}{2199023255552}$ $\frac{83}{4398046511104}$ $\frac{85}{8796093022208}$ $\frac{87}{17592186044416}$ $\frac{89}{35184372088832}$ $\frac{91}{70368744177664}$ $\frac{93}{140737488355328}$ $\frac{95}{281474976710656}$ $\frac{97}{562949953421312}$ $\frac{99}{1125899906842624}$ $\frac{101}{2251799813685248}$ $\frac{103}{4503599627370496}$ $\frac{105}{9007199254740992}$ $\frac{107}{18014398509481984}$ $\frac{109}{36028797018963968}$ $\frac{111}{72057594037927936}$ $\frac{113}{144115188075855872}$ $\frac{115}{288230376151711744}$ $\frac{117}{576460752303423488}$ $\frac{119}{1152921504606846976}$ $\frac{121}{2305843009213693952}$ $\frac{123}{4611686018427387904}$ $\frac{125}{9223372036854775808}$ $\frac{127}{18446744073709551616}$ $\frac{129}{36893488147419103232}$ $\frac{131}{73786976294838206464}$ $\frac{133}{147573952589676412928}$ $\frac{135}{295147905179352825856}$ $\frac{137}{590295810358705651712}$ $\frac{139}{1180591620717411303424}$ $\frac{141}{2361183241434822606848}$ $\frac{143}{4722366482869645213696}$ $\frac{145}{9444732965739290427392}$ $\frac{147}{18889465931478580854784}$ $\frac{149}{37778931862957161709568}$ $\frac{151}{75557863725914323419136}$ $\frac{153}{151115727451828646838272}$ $\frac{155}{302231454903657293676544}$ $\frac{157}{604462909807314587353088}$ $\frac{159}{1208925819614629174706176}$ $\frac{161}{2417851639229258349412352}$ $\frac{163}{4835703278458516698824704}$ $\frac{165}{9671406556917033397649408}$ $\frac{167}{19342813113834066795298816}$ $\frac{169}{38685626227668133590597632}$ $\frac{171}{77371252455336267181195264}$ $\frac{173}{154742504910672534362390528}$ $\frac{175}{309485009821345068724781056}$ $\frac{177}{618970019642690137449562112}$ $\frac{179}{1237940039285380274899124224}$ $\frac{181}{2475880078570760549798248448}$ $\frac{183}{4951760157141521099596496896}$ $\frac{185}{9903520314283042199192993792}$ $\frac{187}{19807040628566084398385987584}$ $\frac{189}{39614081257132168796771975168}$ $\frac{191}{79228162514264337593543950336}$ $\frac{193}{158456325028528675187087900672}$ $\frac{195}{316912650057057350374175801344}$ $\frac{197}{633825300114114700748351602688}$ $\frac{199}{1267650600228229401496703205376}$ $\frac{201}{2535301200456458802993406410752}$ $\frac{203}{5070602400912917605986812821504}$ $\frac{205}{10141204801825835211973625643008}$ $\frac{207}{20282409603651670423947251286016}$ $\frac{209}{40564819207303340847894502572032}$ $\frac{211}{81129638414606681695789005144064}$ $\frac{213}{162259276829213363391578010288128}$ $\frac{215}{324518553658426726783156020576256}$ $\frac{217}{649037107316853453566312041152512}$ $\frac{219}{1298074214633706907132624082305024}$ $\frac{221}{2596148429267413814265248164610048}$ $\frac{223}{5192296858534827628530496329220096}$ $\frac{225}{10384593717069655257060992658440192}$ $\frac{227}{20769187434139310514121985316880384}$ $\frac{229}{41538374868278621028243970633760768}$ $\frac{231}{83076749736557242056487941267521536}$ $\frac{233}{166153499473114484112975882535043072}$ $\frac{235}{332306998946228968225951765070086144}$ $\frac{237}{664613997892457936451903530140172288}$ $\frac{239}{1329227995784915872903807060280344576}$ $\frac{241}{2658455991569831745807614120560689152}$ $\frac{243}{5316911983139663491615228241121378304}$ $\frac{245}{10633823966279326983230456482242756608}$ $\frac{247}{21267647932558653966460912964485513216}$ $\frac{249}{42535295865117307932921825928971026432}$ $\frac{251}{85070591730234615865843651857942052864}$ $\frac{253}{170141183460469231731687303715884105728}$ $\frac{255}{340282366920938463463374607431768211456}$ $\frac{257}{680$



Overview


2019-2020 Self-Review...

2019-2020 Part 2: Non...

2019-2020 Part 3: SLL ...

Summary

2019-2020 APR Campus Leaders



Employee Name

Position

7/1/2019 - 6/30/2020

0%

Summary

Overall Rating ?
N/A

	Manager Review (100%)
2019-2020 Manager Review Part 1: Bonusable Goals & Summary	-
2019-2020 Part 2: Non-Bonusable Goals	-
2019-2020 Part 3: SLL Evaluation	-
Overall ?	N/A

Back

Manager-Review:2019-2020 APR for Campus Leaders



Overview



2019-2020 Manager R...



2019-2020 Part 2: Non...



2019-2020 Part 3: SLL ...



Summary

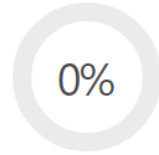
2019-2020 APR Campus Leaders



Employee Name

Position

7/1/2019 - 6/30/2020



Overview

At IDEA, our Staff Development Cycle is a formal mechanism to engage in receiving and providing feedback about growth and development at IDEA, in addition to the feedback received throughout the year via coaching conversations and check-ins. IDEA's Annual Performance Review is an opportunity for managers and staff members to discuss the staff member's year-long performance using evidence gathered from observations, coaching conversations, action plans, previous rounds of the Staff Development Cycle, goal achievement and competency ratings on staff member's respective rubric.

For productive conversations, both manager and direct report need to complete this form prior to having the Annual Performance Review meeting/conversation.

Contact us at Cornerstone@ideapublicschools.org for any questions or additional technical support. Here's a quick guide on how to fill out your Round 3 forms, [Click Here](#)

Review Step Progression



Manager Review



Self Review



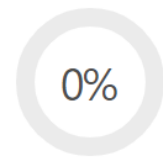
[Get Started](#)

- Overview
- 2019-2020 Manager R...
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- 2019-2020 Part 3: SLL ...
- Summary

2019-2020 Manager R...

2019-2020 Part 3: SLL ...

Summary



- Overview
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- Summary

ANNUAL PERFORMANCE REVIEW SUMMARY
Reflect on your direct report's top strengths and areas of growth. How could this direct report continue to improve next year?
Please list one to two strategies or actions for continued improvement.

Comments:

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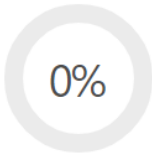
Next

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- 2019-2020 Part 3: SLL ...
- Summary

2019-2020 APR Campus Leaders



Employee Name
Position
7/1/2019 - 6/30/2020



2019-2020 Part 2: Non-Bonusable Goals

Select **"Goal Met"** for each goal successfully met this year. If goal was not met OR if final data for the goal is still pending (i.e. matriculation, retention or persistence), select **"Goal Not Met or Goal Pending"**.

Title of Goals

Status: Completed
Start Date: 7/1/2019
Due Date: 6/30/2020

[more...](#)

Select

Comments:

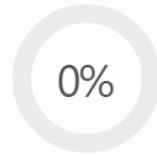
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2019-2020 APR Campus Leaders

- Overview
- 2019-2020 Manager R...
- 2019-2020 Part 2: Non...
- 2019-2020 Part 3: SLL ...**
- Summary



Employee Name
Position
7/1/2019 - 6/30/2020



2019-2020 Part 3: SLL Evaluation

Rate yourself on the SLLs you focused on this year, including those you identified during Goal Setting in the fall.

Managers of instructional leaders: rate your direct reports on the SLLs they focused on this year, including those identified during Goal Setting in the fall.

[Click here to view the 2019-20 School Leadership Levers.](#)



LEVER 1: DATA DRIVEN INSTRUCTION

(1A) Make School Level Data-Driven Decisions *

N/A
☐

Novice
☐

Developing
☐

Proficient
☐

Advanced
☐

[Rating History](#)

(1B) Track and Manage Data *

N/A
☐

Novice
☐

Developing
☐

Proficient
☐

Advanced
☐

[Rating History](#)

(1C) Conduct Data Conversations *

N/A
☐

Novice
☐

Developing
☐

Proficient
☐

Advanced
☐

[Rating History](#)

(1D) Lead Student Work Analysis Meetings *

N/A
☐

Novice
☐

Developing
☐

Proficient
☐

Advanced
☐

Overview

2019-2020 Manager R...

2019-2020 Part 2: Non...

2019-2020 Part 3: SLL ...

Summary

?

LEVER 2: OBSERVATION & FEEDBACK

(2A) Conduct Classroom Observations *

N/A

Novice

Developing

Proficient

Advanced

Rating History

(2B) Lead Observation Feedback Meetings *

N/A

Novice

Developing

Proficient

Advanced

Rating History

(2C) Follow Up & Coach to Mastery *

N/A

Novice

Developing

Proficient

Advanced

Rating History

Comments:

B

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- Overview
- 2019-2020 Manager R...
- 2019-2020 Part 2: Non...
- 2019-2020 Part 3: SLL ...
- Summary

LEVER 3: PROGRAM & PLANNING

(3A) Coach Unit / Module Unpacking *

N/A

Novice

Developing

Proficient

Advanced

Rating History

(3B) Evaluate Lesson Plans *

N/A

Novice

Developing

Proficient

Advanced

Rating History

(3C) Pass a DI Check Out. *

N/A

Novice

Developing

Proficient

Advanced

Rating History

Comments:



Overview



2019-2020 Self-Review...



2019-2020 Part 2: Non...



2019-2020 Part 3: SLL ...



Summary

LEVER 4: STUDENT CULTURE

(4A) Share a Compelling Recruitment Message *

N/A
☐

Novice
☐

Developing
☐

Proficient
☐

Advanced
☐

[Rating History](#)

(4B) Set Vision for Culture of Achievement *

N/A
☐

Novice
☐

Developing
☐

Proficient
☐

Advanced
☐

[Rating History](#)

(4C) Design Behavior Management System & Culture Rubric *

N/A
☐

Novice
☐

Developing
☐

Proficient
☐

Advanced
☐

[Rating History](#)

(4D) Monitor Student Culture *

N/A
☐

Novice
☐

Developing
☐

Proficient
☐

Advanced
☐

[Rating History](#)

(4E) Prevent & Respond to Misbehavior *

N/A
☐

Novice
☐

Developing
☐

Proficient
☐

Advanced
☐

[Rating History](#)

Comments:

- Overview
- 2019-2020 Self-Review...
- 2019-2020 Part 2: Non...
- 2019-2020 Part 3: SLL ...
- Summary

LEVER 5: STAFF CULTURE & DEVELOPMENT

(5A) Interview & Select Staff *

N/A Novice Developing Proficient Advanced
[Rating History](#)

(5B) Onboard New Hires *

N/A Novice Developing Proficient Advanced
[Rating History](#)

(5C) Lead Staff Development Cycle *

N/A Novice Developing Proficient Advanced
[Rating History](#)

(5D) Make Ongoing Staffing Decisions *

N/A Novice Developing Proficient Advanced
[Rating History](#)

(5E) Lead Effective PD *

N/A Novice Developing Proficient Advanced
[Rating History](#)

(5F) Build Trust & Team *

N/A Novice Developing Proficient Advanced
[Rating History](#)

Comments:



Overview



2019-2020 Self-Review...



2019-2020 Part 2: Non...



2019-2020 Part 3: SLL ...



Summary

LEVER 6: LEADING OTHER LEADERS

(6A) Coach & Manage Leaders *

N/A
☐

Novice
☐

Developing
☐

Proficient
☐

Advanced
☐

[Rating History](#)

(6B) Lead Instructional Rounds *

N/A
☐

Novice
☐

Developing
☐

Proficient
☐

Advanced
☐

[Rating History](#)

(6C) Facilitate Daily Huddles *

N/A
☐

Novice
☐

Developing
☐

Proficient
☐

Advanced
☐

[Rating History](#)

(6D) Facilitate Weekly Tacticals *

N/A
☐

Novice
☐

Developing
☐

Proficient
☐

Advanced
☐

[Rating History](#)

(6E) Facilitate Strategy Meetings *

N/A
☐

Novice
☐

Developing
☐

Proficient
☐

Advanced
☐

[Rating History](#)

(6F) Facilitate Stepback Meetings *

N/A
☐

Novice
☐

Developing
☐

Proficient
☐

Advanced
☐

[Rating History](#)

Comments:

(7A) Share School Vision *

Advanced ☐

Rating History

Advanced
☐

Rating History

Advanced ☐

Rating History

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- Overview
- 2019-2020 Self-Review...
- 2019-2020 Part 2: Non...
- 2019-2020 Part 3: SLL ...**
- Summary

LEVER 8: TIME MANAGEMENT & ORGANIZATION

(8A) Hold Admin Daily Meetings *

N/A

Novice

Developing

Proficient

Advanced

Rating History

(8B) Organize Time & Tasks *

N/A

Novice

Developing

Proficient

Advanced

Rating History

(8C) Organize Work & Teams *

N/A

Novice

Developing

Proficient

Advanced

Rating History

(8D) Build & Manage Systems *

N/A

Novice

Developing

Proficient

Advanced

Rating History

Comments:


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2019-2020 APR Campus Leaders

 Overview

 2019-2020 Manager R...

 2019-2020 Part 2: Non...

 2019-2020 Part 3: SLL ...

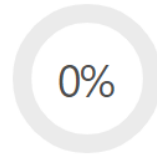
 Summary



Employee Name

Position


7/1/2019 - 6/30/2020



Summary

Overall Rating 

N/A

	Manager Review (100%)
2019-2020 Manager Review Part 1: Bonusable Goals & Summary	-
2019-2020 Part 2: Non-Bonusable Goals	-
2019-2020 Part 3: SLL Evaluation	-
Overall 	N/A

Back

2019-20 Annual Performance Review – Manager Sample Agenda

Below is the sample agenda for a 30-minute APR meeting. As managers, please adjust or increase time where needed for each of your direct reports. If you need to make changes to an APR form after the meeting, please refer to the How-To Guide [HERE](#).

Agenda Item	Guidance, Sentence Starters, & Context	Suggested Time
Preview APR Meeting	Share the agenda with your Direct Report – “How we will spend our time...” Allow you and your direct report to align on your discussion and topics. You will want to share what you will cover together and how much time you would like to spend on each area. This will set you and your direct report up for success.	2 minutes
Personal Touchpoint	Check in on your Direct Reports – “How are you doing?” Reinforce a personal connection during the conversation. In our current virtual work environment asking people how they are doing personally and demonstrating genuine concern for their well-being is now more important than ever.	6 minutes
Goals Review	Determine and align on Goals Met, Not Met, or Pending – “Our final progress on goals set this year is ...” Review each bonusable and non-bonusable goal with your direct report to finalize the data, evidence, and rationale. Be sure that each goal status is captured correctly as ‘met’, ‘not met’ or ‘pending’. Before moving to the next section of your agenda share the overall goals met for the year. Remember that goals still ‘pending’ at the end of your APR or school year will be updated later.	7 minutes
Performance Review	Articulate strengths, areas of growth, & steps for continual improvement – “As I think about your performance throughout the year, your strengths/areas of improvement are...” “Strategies or tactics to leverage next year are...” Emphasize their strengths, growth, and development this past year and in the future. Our staff highly values this critical element of IDEA’s organizational culture and appreciate the feedback our managers provide. Naming 1-2 clear and actionable steps for improvement will provide clarity on how team members can make measurable improvements in the upcoming school year.	7 minutes
Overall Rating	Norm on final performance ratings based on aligned rubrics – “Based on observations/feedback, data/benchmarks, your overall rating is...” Discuss overall ratings in each rubric area to ensure direct reports understand context for placements. After discussing ratings and placements, ensure areas of strength and areas of focus for next year are solidified.	7 minutes
Closing Questions & Next Steps	Close APRs out with clarity – “Thanks for a great APR meeting. Next steps for you/me are...” “I am really looking forward to _____ next year.” OR “Thanks for a great APR meeting, we appreciate all you did for IDEA and wish you the best.” Restate next steps, actions, or strategies for continuous into next year and thank your direct report for engaging in their APR discussion. Take a moment to share with them how critically important they are to your campus/team next year, how they specifically contribute to the mission of IDEA, and the role you are counting on them to play in achieving the inspiring vision you have set as their leader.	3 minutes

***For non-returning team members:** Please conduct a complete APR meeting as outlined above to ensure that our departing team members are clear about their strengths, opportunities for growth, and overall performance at IDEA. In addition to ensuring that team members have a productive exit from IDEA, the APR will serve as their final performance

record at IDEA. In some instances, team members who have left IDEA desire to return in the future and your APR may serve as a key source of information in a re-hiring decision.

2019-20 Annual Performance Review Summary

Self-Review Training
May 2020

Summary Objectives

- **Team Members Will Be Able to**
 - Explain the purpose of the Annual Performance Review (APR)
 - Identify Key **APR Dates**
 - Identify the **WHAT, WHO, WHEN, & HOW** of an APR

PURPOSE OF AN APR

- The Annual Performance Review (APR) is an opportunity for you and your manager to discuss your performance for the school year, including
 - Goals that were set in the first round of the cycle, bonusable, non-bonusable and developmental
 - All strands of the GET rubric (instructional staff), the aligned Leadership Competencies and rubrics by roles and departments (other leaders and HQ/Regional staff) and the Core Values (all staff)
- During the performance review conversations, managers and team members to discuss overall performance, goal attainment, and areas of continuous improvement for the upcoming academic year.

KEY DATES & TIMELINE FOR APRs

APR WINDOW

- LAUNCHES:
 - May 13th, 2020
- CLOSES:
 - June 12th, 2020

- **APR TIMELINE**
(to complete between 5/13 – 6/12)
 - **First**, connect with your direct manager to ensure your APR meeting is scheduled and confirmed.
 - **Second**, log into Cornerstone and complete your APR Self Review at least 48 hours before your scheduled meeting.
 - **Third**, save and send your completed APR to your manager for review 48 hours before your meeting. Refer to the how-to print your APR task to generate the document, then download and save.
 - *If your manager hasn't scheduled your meeting by May 19th, please follow up with them to ensure it is scheduled as soon as possible.

WHAT – OF AN APR

WHAT you prepare and discuss for your APR

- **Goal Attainment:** Align on Goals Met, Not Met, or Pending to finalize progress on goals set this year.
- **Strengths and Opportunities:** Reflect on your strengths, growth, and development this year and your plan to improve next year.
- **Self-Evaluation:** Discuss your self-ratings and placements to norm with your manager on strengths and areas of opportunity for next year.
 - *Instructional staff rate using **GET Rubric***
 - *All other staff rate using their aligned **Performance Rubric (SLLs, LCs, etc.)***
 - ***Core Values (all staff)***
- **Plan for Next Year:** Restate next steps for continuous improvement into next year.

WHO – OF AN APR

- All staff are expected to
 - **COMPLETE APR FORM IN CORNERSTONE** by end of window
- All staff are expected to
 - **PARTICIPATE IN APR MEETING** with their manager by end of window

WHEN – OF AN APR

- Forms available in Cornerstone starting **May 13th**
- APR meetings will be held **by June 12th**
- Complete your form at least **48 hours before** your meeting *(print preview and email)*
- Remind your manager if s/he doesn't schedule your meeting by **May 19th**

HOW – OF AN APR

- **SELF REVIEW VIDEO & AGENDA**
 - Click [Chapter 1](#) for the self review.
 - Click [HERE](#) for the 30-minute team member agenda.
- **APR HOW-TO-GUIDES**
 - [INSTRUCTIONAL STAFF SELF REVIEW](#)
 - [ALL OTHER STAFF SELF REVIEW](#)
 - [REOPEN APR TASK](#)
 - Click [here](#) to access the How-to-Print your APR task.

NEED SUPPORT?

- Always reach out to your direct manager first
- Then,
 - Need support with Cornerstone, email cornerstone@ideapublicschools.org
 - Need support with completing your APR, email TalentManagement@ideapublicschools.org



IDEA Headquarters
2115 W. Pike Boulevard
Weslaco, Texas 78596
Phone 956.377.8000
Fax 956.447.3796

Talent Reviews

What's A Talent Review:

A strategic meeting that helps an organization (IDEA) understand its current staffing landscape by mapping snapshots of the performance and potential of our employees. Talent reviews provide an early, high-level view of employees current results and future growth and success potential. Ultimately, talent reviews can inform talent strategies; both immediate and long-term.

Purpose of Talent Reviews:

- Identify high-performing staff members as well as those most in need of support.
- Guide managers in determining development plans for all staff members.
- Set intention and direction for implementing differentiated staff member prescriptions with clarity for increased performance and growth.
- Elevate awareness of possible retention risks AND inform succession planning among high-potential staff members.

Goals:

1. Identify personalized plans for improved performance and career planning
2. Ensure we are retaining our high-performing staff members
3. Act quickly to remove staff who are not good for students

Process:

Talent Review	Who Gets Rated	Window	Who Participates
Campus Instructional	Teachers Teacher Residents Co-Teachers School Lead Team Campus Support	Sept. 24 – Nov. 1	Principals School Lead Team EDs VPs of Schools



IDEA Headquarters
2115 W. Pike Boulevard
Weslaco, Texas 78596
Phone 956.377.8000
Fax 956.447.3796

HQ National	All HQ/National Team Staff	Nov. 5 - Nov. 7	Chiefs VPs
Regional	Principals APOs Regional Team Members	Nov. 11 – Nov. 15	EDs VP of Schools RDOs Managers of Regional Teams
Campus Operations	Front Office Staff Campus Auxiliary Managers	Jan. 13 – Feb. 28	APOs
Campus Auxiliary	Custodians Food Service Specialists Bus Drivers Assistant Managers	Jan. 13 – Feb. 28	APOs Cafeteria Managers Facilities Managers Transportation Managers



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Phone 956.377.8000
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TALENT REVIEW 9 CELL

Potential

HIGH

MEDIUM

LOW

7 COACHABLE: Low Performance, high rate of growth

(C Players)

8 FUTURE STAR: Average performance, high rate of growth

(A Players)

9 IRREPLACEABLE: High performance, high rate of growth

(A Players)

4 POOR: Low performance, improving moderately

(C Players)

5 SOLID: Average performance, improving moderately

(B Players)

6 CURRENT STAR: High performance, improving moderately

(A Players)

1 UP OR OUT: Low performance, little to no growth or improvement

(PIP or Exit)

2 ACCEPTABLE: Average performance, little to no growth or improvement

(B Players)

3 PERFORMING: High performance, little to no growth or improvement

(B Players)

LOW

MEDIUM

HIGH

Performance