

LOUISIANA DEPARTMENT OF EDUCATION
MONITORING OF CHARTER SCHOOLS



PERFORMANCE AUDIT
ISSUED MAY 15, 2013

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AT 225-339-3800.**

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LOUISIANA LEGISLATIVE AUDITOR
DARYL G. PURPERA, CPA, CFE

May 15, 2013

The Honorable John A. Alario, Jr.,
President of the Senate
The Honorable Charles E. "Chuck" Kleckley,
Speaker of the House of Representatives

Dear Senator Alario and Representative Kleckley:

This report provides the results of our performance audit on the Louisiana Department of Education's monitoring of charter schools.

The report contains our findings, conclusions, and recommendations. Appendix A contains the department's response to this report. I hope this report will benefit you in your legislative decision-making process.

We would like to express our appreciation to the management and staff of the Louisiana Department of Education for their assistance during this audit.

Sincerely,

A handwritten signature in blue ink that reads "Daryl G. Purpera".

Daryl G. Purpera, CPA, CFE
Legislative Auditor

DGP/ch

CHARTER SCHOOLS 2013

Louisiana Legislative Auditor

Daryl G. Purpera, CPA, CFE



Louisiana Department of Education - Monitoring of Charter Schools

May 2013

Audit Control # 40120016

Introduction

This performance audit evaluates whether the Louisiana Department of Education (LDOE) met required monitoring activities for charter schools during fiscal year 2012. Charter schools are independent, publicly funded elementary and/or secondary schools that are operated through a charter between a nonprofit organization or other group and a state or local oversight agency. Bulletin 126 of the Louisiana Administrative Code requires LDOE to monitor the academic, financial, and legal/contractual performance of Types 2, 4, and 5 charter schools annually and to conduct renewal and extension reviews of these schools' contracts. Appendix A contains LDOE's response to this report and Appendix B details our scope and methodology. Our objective was as follows:

Did LDOE meet required monitoring activities for charter schools during fiscal year 2012?

Background

Legal Authority and Program Overview. Charter schools began in Louisiana as a pilot program in eight school districts with the passage of Act 192 of 1995. In 1997, Act 477 expanded the program by allowing the Board of Elementary and Secondary Education (BESE) and local school boards (LSB) to authorize charter schools and by allowing all local school districts to participate in the program. The intent of the charter school program is to:

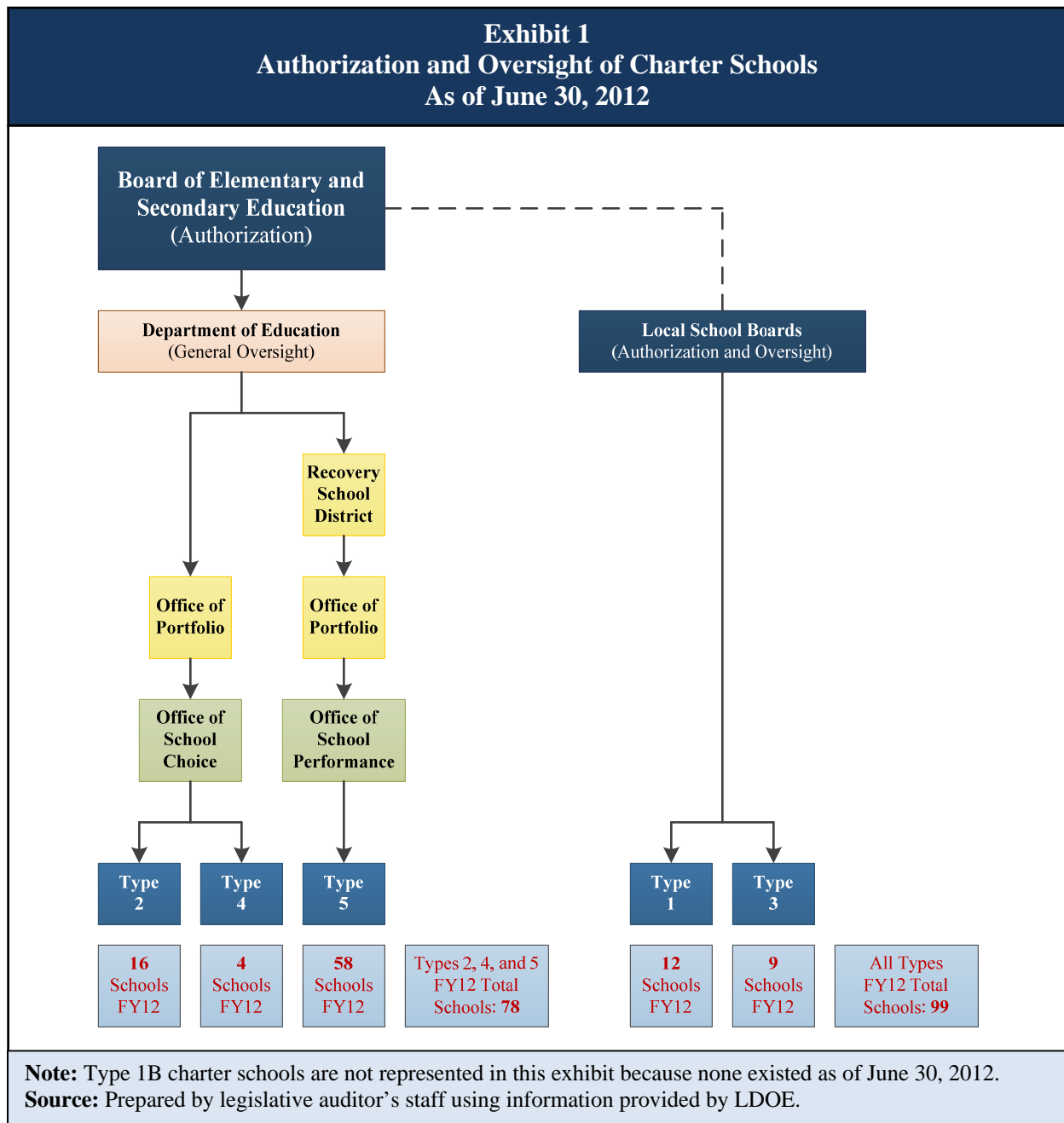
- Allow experimentation by authorizing the creation of innovative schools.
- Provide a means for all persons with valid ideas and motivation to participate in this experiment while also incorporating a mechanism to analyze results.
- Make the best interests of at-risk pupils the overriding consideration.

Authorization and Oversight. During fiscal year 2012 (2011-2012 school year), 99 charter schools serving 45,684 students operated in Louisiana. The six types of charter schools are as follows:

- **Type 1** - Charter creates a new school authorized by a LSB
- **Type 1B** - Charter authorized by Local Charter Authorizer¹
- **Type 2** - Charter authorized by BESE
- **Type 3** - Charter converts a pre-existing school authorized by a LSB
- **Type 4** - Charter between a LSB and BESE
- **Type 5** - Pre-existing public school transferred to the Recovery School District (RSD) and operated as a BESE-authorized charter school

Within LDOE, the Office of School Choice monitors Types 2 and 4 charter schools and RSD's Office of School Performance monitors Type 5 charter schools. Types 1 and 3 charter schools are monitored directly by LSBs. Exhibit 1 shows the authorization and oversight structure for each type of charter school. This audit focuses on the 78 Types 2, 4, and 5 charter schools operating during fiscal year 2012 for which LDOE was responsible for monitoring.

¹ As of March 2013, no charter schools had been authorized by a Local Charter Authorizer to operate during fiscal year 2013.



Monitoring Requirements. BESE creates policies governing state public education, which are published in "bulletins" and become part of the Louisiana Administrative Code. Bulletin 126 implements the requirements of Louisiana's Charter School Law.² Charter schools operate with greater flexibility and autonomy in exchange for heightened accountability through regular monitoring. To continue to operate, charter schools must meet defined academic goals and maintain satisfactory financial and legal/contractual performance. One of BESE's responsibilities as the authorizer of Types 2, 4, and 5 charter schools is to direct LDOE to review and evaluate these schools' academic, financial, and legal/contractual performance annually.

² Louisiana Revised Statute 17:3971 *et seq.*

LDOE then recommends to BESE whether to renew or extend a charter’s contract based on the following three categories:

- Academic Performance.** According to Bulletin 126, student performance is the primary measure of charter school quality. BESE uses LDOE’s assessment and accountability system as an objective and verifiable measure of student achievement and school performance. The accountability system includes the Baseline School Performance Score (SPS), Growth SPS, and Assessment Index.
- Financial Performance.** Bulletin 126 also requires LDOE to evaluate charter schools annually on the timely submission of budgets, audits, and financial reports. In addition, LDOE is required to assess school financial performance using the financial risk assessment framework approved and adopted by BESE. This risk assessment monitors external conditions that, if not addressed, could render the school financially vulnerable (e.g., student enrollment, trends in fiscal conditions, and future retirement obligations).
- Legal and Contract Performance.** BESE evaluates a charter school’s performance based on LDOE’s oversight and monitoring of the charter school’s compliance with its statutory, regulatory, and contractual obligations. According to Bulletin 126, LDOE’s evaluation must be based on, but not be limited to, an annual review of the following six indicators for each charter school as shown in Exhibit 2.

SPS is calculated according to grade configuration based on a combination of attendance, testing, dropout, and graduation information.

<p align="center">Exhibit 2 Legal and Contract Performance Monitoring Types 2, 4, and 5 Charter Schools</p>	
<p align="center">Indicators</p>	<p align="center">Evidence Gathered During Formal Review and Site Visits</p>
<p align="center">Special Education and English Language Learners Program</p>	<ul style="list-style-type: none"> Food and Nutrition Program Ethics Percent of Certified Teachers Percent of At-Risk Students Percent of Disabled Students Composition of the school’s board of directors, frequency of meetings, minutes from meetings, and documentation of board training Required Progress Reports submitted to parents, the community, and LDOE School Administrative policies and procedures for the following: enrollment, discipline, parental complaints, and pupil progression plans Timely submission of required reports
<p align="center">Student Enrollment</p>	
<p align="center">Student Discipline</p>	
<p align="center">Health and Safety</p>	
<p align="center">Governance</p>	
<p align="center">Facilities</p>	
<p>Source: Prepared by legislative auditor’s staff using information from LDOE and Bulletin 126.</p>	

Did LDOE meet required monitoring activities for charter schools during fiscal year 2012?

We determined that LDOE monitored the financial performance of all charter schools as required in fiscal year 2012. However, LDOE did not perform all required academic monitoring activities and did not verify that the school-reported data used to calculate School Performance Scores (SPS) and make charter school operating decisions is reliable. In addition, we found that LDOE could not provide evidence that it comprehensively monitored the legal/contractual performance of these charter schools and did not determine in fiscal year 2011 if schools placed on probation during fiscal year 2010 met required standards to continue operating during fiscal year 2012. Our findings are discussed in more detail below.

LDOE did not provide a Pre-Assessment Index for the 10 charter schools in their first year of operation within the required timeframe.

As part of Bulletin 126's academic monitoring requirements for fiscal year 2012, LDOE was to provide each charter school with a pre-assessment index (PAI) in the fall of its first year of operation. The PAI provides a school with a baseline measure of student performance and consists of its enrolled students' state testing results from the preceding spring, where available. According to Bulletin 126, the charter school is to use the PAI, along with current spring state testing results, to determine changes in student performance during its first year of operation. However, LDOE did not provide PAIs in the fall for any of the 10 charter schools that were in their first year of operation during fiscal year 2012.³

According to LDOE, it was waiting until after the 2012 spring testing to calculate the PAI so that the index would only include the testing histories of students who remained and tested with the school. However, LDOE did not provide these 10 schools with a PAI until April 8, 2013. As a result, the schools did not have the information they needed to assess their academic performance until halfway through their second year of operation. According to LDOE, during fiscal year 2013 it updated Bulletin 126 to require LDOE to provide PAIs to schools during the fall of their second year of operation, instead of the fall of their first year.

Recommendation 1: LDOE should calculate and provide PAIs to schools according to the requirements in Bulletin 126.

Summary of Management's Response: LDOE agrees with this recommendation. See Appendix A of the report for LDOE's full response.

³ There were 11 total first-year schools in fiscal year 2012. However, LDOE considers a school to have insufficient data to calculate a PAI if the school has fewer than 10 students with a testing history. One of the 11 first-year schools had insufficient data in fiscal year 2012 and thus could not have received a PAI from LDOE.

LDOE had sufficient processes to ensure testing data was reliable, but did not verify that the school-reported data used to calculate School Performance Scores (SPS) was reliable.

Student performance is the primary measure of school quality and is the main component for LDOE’s renewal and extension decisions.⁴ Therefore, it is critical that the data LDOE uses to calculate the SPSs of schools is reliable. Bulletin 741 requires that charter schools maintain supporting documentation for the data used to calculate these scores. In addition, the National Association of Charter School Authorizers recommends that authorizers not rely on self-reported data from schools unless it has been verified. However, LDOE accepts self-reported data from the schools without verifying the reliability of that data. According to LDOE, it stopped conducting on-site audits in 2008 because of a lack of resources.⁵

SPSs are currently calculated using four different components: testing, attendance, dropout, and graduation. These components and the percentages of the total SPS that they comprise are shown in Exhibit 3. The results of our review of each of the different components are summarized in the sections following the exhibit.

Exhibit 3 Components of School Performance Scores Fiscal Year 2012					
Grades	School Reported Data				Total
	Testing	Attendance	Dropout	Graduation	
K - 6	90%	10%	-	-	100%
K - 8	90%	5%	5%	-	100%
9 - 12	70%	-	-	30%	100%
<p>Note: The SPS calculation generally changes annually. In addition, there are incentive points, not reflected here, for certain outcomes in each grade configuration. Source: Prepared by legislative auditor’s staff using information from Bulletin 111.</p>					

Testing Data. As shown in Exhibit 3, testing comprises the largest percentage of a school’s SPS. According to LDOE staff, test results are reported electronically and schools are not required to maintain documentation to support the results. Therefore, we reviewed the processes LDOE and its testing vendors⁶ have established to ensure that test scores are reliable. Overall, we found that LDOE and its vendors have established sufficient processes to help ensure testing data is reliable. These processes include:

- Both vendors and LDOE staff provide annual training to district test coordinators, who then provide training to school test coordinators.

⁴ Bulletin 126, §1101(D)

⁵ LDOE has developed error reports and basic edit checks to test the reasonableness and consistency of data entry by schools but does not conduct audits to ensure data accuracy.

⁶ Data Recognition Corporation and Pacific Metrics

- Each district⁷ must adopt a test security policy that complies with the state policy contained in Bulletin 118.
- LDOE must conduct test site visits to ensure proper test administration procedures and look for breaches in test security.
- The vendor performs erasure and plagiarism analyses on completed tests, and LDOE confirms plagiarism analyses.
- LDOE voids tests if a school or district violates test security policy.

School Reported Data. LDOE policies require that schools report attendance and dropout data to LDOE's Student Information System (SIS) and graduation data to LDOE's Student Transcript System (STS). According to LDOE staff, it has established edit checks to help ensure schools enter data in the proper format. LDOE also has developed some error reports, which help ensure that data entered is valid.⁸ However, LDOE no longer conducts on-site audits or reviews that help ensure the electronic data in its systems is accurate. We reviewed SIS and STS records used to calculate SPSs from a sample of 11 charter schools operating in fiscal year 2012 and found the following issues:

Attendance Data. Bulletin 741 requires that schools maintain a record of each student's attendance. According to LDOE, records may be electronic attendance records from the school's own data system or both paper and electronic records. We reviewed attendance records for a sample of 325 students at nine schools and found that 84 (25.8%) student records had attendance data that differed from LDOE's SIS data for fiscal year 2011.⁹

Dropout Data. LDOE policy requires that schools maintain supporting documentation for dropouts, such as withdrawal forms and requests for records from other schools. We reviewed dropout records for 130 students and found that 15 (11.5%) did not have sufficient documentation to support the withdrawal.

Graduation Data. LDOE regulations and policies do not specify what documentation schools should maintain to support what they enter into STS. Therefore, we were unable to assess the accuracy of transcript information.

Recommendation 2: LDOE should implement a process, such as data audits, to ensure that the school reported data used to calculate SPSs is reliable.

⁷ Louisiana has 111 school districts and independent schools that are required to submit test security policies, including the RSD (Type 5 charter schools). Types 1, 3, and 4 schools adhere to the policy of the district that authorized their charter. Type 2 schools report directly to LDOE and thus are responsible for creating their own security policies.

⁸ Validity refers to the extent to which data represents what it is supposed to represent.

⁹ Attendance data from fiscal year 2011 is the most current data used in the SPS calculation for schools operating in fiscal year 2012. According to LDOE, beginning in fiscal year 2013 it will no longer use attendance data in the SPS calculation.

Summary of Management's Response: LDOE does not agree with this recommendation. According to LDOE management, attendance data will be used for a final transition year SPS in the fall of 2013 but will not be calculated into the SPS beyond that date. Dropout data will count as 5% of the SPS only for schools that serve grades 7 & 8. LDOE further states that while dropout data is important, it has a relatively low impact on the overall SPS. See Appendix A of the report for LDOE's full response.

LLA Additional Comments: While the dropout data is 5% of the SPS calculation for schools that serve grades 7 & 8, this data is also used to calculate the graduation cohort component of the high school SPS. Beginning in fiscal year 2013, the graduation cohort component constitutes 25% of the high school SPS calculation.

LDOE could not provide evidence that it comprehensively monitored the legal/contractual performance of charter schools during fiscal year 2012.

According to Bulletin 126, LDOE's annual evaluation of a charter school's legal/contractual performance must be based on, but not limited to, six indicators (see Exhibit 2 for indicators). LDOE's monitoring of legal/contractual performance is important to proactively ensure that schools are meeting their legal/contractual obligations, including ensuring that students' health and safety is protected, disciplinary problems are handled appropriately, special education requirements are met, and facilities meet building code requirements. LDOE conducted facility walkthroughs at all 13¹⁰ schools that applied for extension or renewal in fiscal year 2012 and had documentation to support that it evaluated the health/safety and facilities indicators for all 13 of these schools, and the special education indicator for six of them. In addition, LDOE had documentation to support that it planned or scheduled site visits for all of the 60 non-extension or non-renewal schools, and had documentation describing the results of 47 of these site visits. However, LDOE could not provide evidence that it comprehensively monitored all of the six legal/contractual indicators at any of the 78 Types 2, 4, and 5 charter schools as required by Bulletin 126.

In our September 2011 report on the Recovery School District, we found that the Recovery School District did not comprehensively monitor all Type 5 charter schools for legal/contractual compliance as required by Bulletin 126. LDOE agreed with our recommendation that it should develop a comprehensive process to annually coordinate the collection of data on all Type 5 charter schools to ensure they are meeting their legal/contractual obligations. LDOE has made some progress on this recommendation. For example, LDOE included in its January 2012 Charter School Annual Report to BESE a column labeled "Legal/Contractual Performance." However, LDOE could not provide evidence that it had addressed all issues in the report. In addition to the facility walkthroughs and site visits discussed above, LDOE stated it also uses parent complaints to indicate legal/contractual issues at schools. According to LDOE staff, there were no complaints during fiscal year 2012 that they were unable to resolve or that were of sufficient materiality to merit sanctions.

¹⁰ There were 18 schools eligible for extension or renewal in fiscal year 2012, but five of the 18 did not apply for extension or renewal.

Implementing a more comprehensive and consistent process to evaluate and document the legal/contractual performance of charter schools every year as required by Bulletin 126 would assist LDOE to proactively identify problems with a school's compliance in a timely manner and ensure that the health and safety of students is protected, disciplinary problems are handled appropriately, and facilities meet building code requirements. LDOE has recently developed a Charter School Performance Compact that outlines the process and provides performance targets for monitoring the legal/contractual performance of charter schools. This compact was approved by BESE in January 2013 and according to LDOE, is currently being implemented in charter schools.

Recommendation 3: LDOE should implement a more comprehensive process to annually assess charter schools' legal/contractual performance that includes the review of the six legal and contractual indicators as required by Bulletin 126.

Summary of Management's Response: LDOE does not agree with this recommendation. According to LDOE management, it is confident that its current practice, as codified in the Charter School Performance Compact, is sufficiently comprehensive to satisfy all requirements in Bulletin 126. See Appendix A of the report for LDOE's full response.

LDOE did not determine in fiscal year 2011 if the eight charter schools placed on probation during fiscal year 2010 met required standards to continue operating during fiscal year 2012.

Based on the results of its academic, financial, and legal/contractual monitoring activities, LDOE may place schools on probation. During fiscal year 2011, Bulletin 126 required LDOE to determine if charter schools placed on probation during the prior year's extension review met required standards to continue operating.

In fiscal year 2010, LDOE placed eight charter schools on contract probation as a result of financial performance issues identified during their extension reviews. According to Bulletin 126, LDOE should have determined if all eight schools met required standards during fiscal year 2011 to continue operating. Based on these determinations, if a school had not achieved Bulletin 126 standards, LDOE was required to recommend to BESE revocation of the school's charter, potentially not allowing the school to operate during fiscal year 2012. However, LDOE did not determine if any of these schools met required standards to continue operating. While one of the schools closed, the remaining seven were allowed to operate during fiscal year 2012 without LDOE ensuring that they were in compliance with Bulletin 126 standards.

In April 2011, BESE repealed the requirement for LDOE to determine if schools on probation met required standards to continue operating. However, Bulletin 126 was not updated until August 2011. According to LDOE staff, it decided to grandfather in the eight schools discussed above to avoid the schools receiving two reviews in a six-month timeframe. However, no such provisions were included in the Bulletin 126 revisions.

Recommendation 4: LDOE should ensure that Bulletin 126 is updated in a timely manner when changes are made to the criteria for monitoring charter schools so that its staff can hold schools accountable for meeting the required standards to operate.

Summary of Management's Response: LDOE agrees with this recommendation. See Appendix A of the report for LDOE's full response.

APPENDIX A: MANAGEMENT'S RESPONSE



LOUISIANA DEPARTMENT OF EDUCATION

May 9, 2013

Mr. Daryl Purpera, CPA, CFE
Legislative Auditor
1600 North Third Street
Post Office Box 94397
Baton Rouge, LA 70804 - 9397

Dear Mr. Purpera,

I would like to thank you and your staff for providing recommendations to ensure that the Department continues to improve the monitoring of charter schools.

We appreciate your feedback and the opportunity to review and respond to these recommendations. Please find the Department's responses to these recommendations attached to this letter.

Thank you for your collaboration and partnership.

Sincerely,

A handwritten signature in black ink that reads "John White".

John White
State Superintendent of Education

Enclosure

Louisiana Believes

A.1

Recommendation 1: *The Department should calculate and provide PAIs to schools according to the requirements in Bulletin 126.*

- **The Department agrees with this recommendation.**
- The Department has adjusted Bulletin 126 to ensure that PAIs are provided to schools in the fall of their second year of operation. For technical reasons related to the verification of testing rosters, this is the earliest that the Department can possibly provide schools with an accurate PAI.
- The Department has provided PAIs for all relevant schools this academic year and will continue to do so in a timely manner and according to the requirements in Bulletin 126.

Recommendation 2: *LDOE should implement a process, such as data audits, to ensure that the school reported data used to calculate SPSs is reliable.*

- **The Department disagrees with this recommendation.**
- First, in June 2012, BESE adjusted the calculation of School Performance Scores to eliminate the inclusion of attendance data. Attendance will be used for a final transition year SPS in the fall of 2013 but will not be calculated into the SPS beyond that date. Dropout data will count as 5% of the SPS only for schools that serve grades 7 & 8. In this regard, the recommendation cited here pertains to only 5% of the future SPS scores for a subset of all schools. While still important, this score has a relatively low impact on the overall School Performance Score. As a result, the Department has instituted alternative processes for verifying data that save the significant resources required to send staff members into the field to conduct data audits on a subset or all of our 1,700+ schools.
- The Department utilizes the same data verification process for all district and charter schools across the state, which includes periodic data validation and reconciliations reports, to ensure that schools enter data accurately.
- The Department will continue to review internal processes to ensure accurate and timely dropout information from all district and charter schools. While we believe that recommendation in this case - physical data audits by DOE staff - would be an additional and ineffective use of resources, we will continue to revisit and improve our data validation processes year after year.

Recommendation 3: *LDOE should develop a more comprehensive process to annually assess charter schools' legal/contractual performance that includes the review of the six legal and contractual indicators as required by Bulletin 126.*

- **The Department disagrees with this recommendation.**
- While the Department had a comprehensive review process in place for last year academic year (2011-12), the Department has developed and introduced a more comprehensive process this academic year (2012-13). The Department is confident that current practice, as codified in the Charter School Performance Compact, is sufficiently comprehensive to satisfy all requirements in Bulletin 126.
- The Charter School Performance Compact, which was developed in collaboration with key stakeholders and approved by BESE in January 2013, clearly outlines the performance expectations for charter school legal and contractual performance. The Department has already begun using the Charter School Performance Compact and it will continue to guide charter legal and contractual performance oversight moving forward.

Recommendation 4: *LDOE should ensure that Bulletin 126 is updated in a timely manner when changes are made to the criteria for monitoring charter schools so that its staff can hold schools accountable for meeting the required standards to operate.*

- **The Department agrees with this recommendation.**
- The Department has ensured that Bulletin 126 is presently up-to-date and will continue to adhere to Bulletin 126 with regard to charter schools that do not meet required standards to operate. In addition, the Department will ensure that Bulletin 126 is updated in a timely manner when any changes are made to the criteria for monitoring charter schools. The Department remains committed to ensuring that changes to Bulletin 126 are carefully vetted and thoughtfully implemented.

APPENDIX B: SCOPE AND METHODOLOGY

We conducted this performance audit under the provisions of Title 24 of the Louisiana Revised Statutes of 1950, as amended. We conducted this audit in response to our September 2011 performance audit that identified weaknesses with the Louisiana Department of Education's (LDOE) Recovery School District's (RSD) monitoring of Type 5 charter schools. Therefore, we expanded our review to include all types of charter schools that LDOE is required to monitor. Our audit focused on LDOE's monitoring activities for Types 2, 4, and 5 charter schools and covered the time period of fiscal year 2012. The audit objective was as follows:

Did LDOE meet required monitoring activities for charter schools during fiscal year 2012?

We conducted this performance audit in accordance with generally accepted government auditing standards issued by the Comptroller General of the United States. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide reasonable basis for our findings and conclusions based on our audit objective. We believe the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objective. To answer our objective, we reviewed internal controls relevant to the audit objective to mitigate the risk of inaccurate data and performed the following audit steps:

- Researched Louisiana Revised Statutes and Administrative Code (including Bulletin 126) for laws and regulations regarding LDOE's responsibilities for monitoring charter schools.
- Reviewed additional Louisiana Administrative Code bulletins relevant to our scope, including Bulletins 111, 118, and 741.
- Researched Division of Administration's Louisiana Register to determine when amendments were made to relevant bulletins.
- Requested internal LDOE policies and procedures to determine additional requirements for charter schools and LDOE staff, but were told by LDOE staff that none existed outside of Bulletin 126.
- Requested charter agreements to determine additional monitoring or academic performance requirements but were told by LDOE staff that agreements are generally standard documents modeled after Bulletin 126 requirements, and these requirements always supersede charter requirements when conflicts arise.
- Interviewed LDOE's Office of School Choice, RSD's Office of School Performance, and LSB personnel to determine monitoring processes for all types of charter schools in Louisiana.

- Conducted monitoring walkthroughs with Office of School Choice and Office of School Performance to determine relevant criteria and document processes for monitoring charter schools.
- Developed checklists to evaluate the monitoring conducted by the Office and School Choice and Office of School Performance based on documented criteria.
- Conducted interviews, documented reviews, sampling, and observations, as necessary, to complete each checklist.
- Interviewed personnel at all types of charter schools to determine LDOE's monitoring process.
- Interviewed LDOE officials and documented student academic performance requirements for charter schools.
- Obtained and analyzed actual performance results for fiscal year 2012 from LDOE's website, compared these results to requirements, and documented whether charter schools met requirements for extensions and/or renewals received.
- Reviewed Board of Elementary and Secondary Education (BESE) meeting minutes for discussions between LDOE and BESE officials related to recommendations and approvals for charter school extensions, renewals, and revocations.
- Interviewed LDOE Information Technology and Office of Accountability staff to determine how academic performance data is collected and maintained, what and how reports are run, and how school performance scores (SPS) are calculated.
- Performed preliminary data testing at charter schools in an attempt to ensure the reliability of the data used by LDOE to calculate SPS, including controls walkthroughs, file reviews, and verifying information with source documentation.