



GRACE SCHOOLS CHARTER AUTHORITY, LLC

Grace Schools Charter Authority, LLC

Accountability System

For Charter Schools Authorized by
Grace College
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For more information, please visit [Grace Schools Charter Authority, LLC](http://graceschoolscharterauthority.com)
or Email charterschools@grace.edu.

Accountability System

Introduction

The Grace Schools Charter Authority, LLC (GSCA,) is committed to fulfilling its role as a high-quality charter school authorizer by holding its schools accountable across a variety of performance dimensions. The accountability system described in this document is rooted in the Grace Schools Charter Authority, LLC's guiding principles:

- **Students First.** When performing its duties, the GSCA always assesses whether its actions will further the best interests of students.
- **High Expectations.** The GSCA expects the charter schools it authorizes to set high academic achievement expectations, develop strong plans for family and community engagement, and adhere to high ethical standards for students, staff and board members. Similarly, the GSCA establishes high performance expectations, engagement plans and ethical standards for itself.
- **Excellence in Leadership.** Operating a high-performing charter school requires excellent leadership from school boards and staff. The GSCA authorizes schools that can demonstrate strong leadership at both the school governance and administrative levels.
- **Commitment to Innovation.** The GSCA is particularly interested in operators that show strong potential to accelerate student success through dramatically different school models, instructional strategies, uses of technology, staffing models, governance arrangements, family and community engagement strategies, and other approaches.
- **Rigorous and Transparent Accountability.** The GSCA holds schools accountable for performance through rigorous and transparent accountability mechanisms that uphold schools' autonomy, foster excellence, and protect student and public interests. In turn, the GSCA is held to a high performance bar by the State Board of Education.

In addition, the accountability system strives to achieve the appropriate balance between an authorizer's obligation to protect student and public interests and uphold school autonomy.

The core components of the GSCA accountability system are the charter agreement and the Accountability Plan, which is incorporated into the charter agreement. The Accountability Plan consists of a set of standard goals and outcome measures across three performance dimensions: academic success, financial health, and organizational compliance. These outcome measures enable the GSCA to assess on a consistent basis the performance of each school within its portfolio. A school's progress as measured against the Accountability Plan performance dimensions is assessed through a combination of written reports, data submission, and school site visits. This collective body of evidence is used to assess school performance over the charter term and also forms the basis for charter renewal decisions. To ensure full transparency, GSCA performance assessments will be reported annually to the school's leader and Board of Directors. It is the intent of the GSCA that annual assessments will encourage constructive dialogue among the school's leadership team regarding continuous improvement efforts.

Site Visits

One of the most important ways that the GSCA gathers performance information about the schools it authorizes is through site visits. Site visits allow the authorizer to observe the school firsthand, interact with key stakeholders, and corroborate school-reported information. Pre-Opening site visits are conducted at least once prior to the start of the school's first year. Once a school has opened its doors and is serving students, the GSCA regularly conducts Formal, Monitoring and End-of-Term site visits.

Pre-Opening Site Visit: A charter school's ability to successfully fulfill the terms of its charter agreement depends a great deal upon what happens before the doors of the school ever open. Some of the most complicated tasks and critical timelines occur during a charter school's pre-operational year(s).

Guided by a detailed Prior Action Checklist, GSCA staff members work with each new school to ensure that it is ready to start its first school year in full compliance with education, financial, health, legal, safety and other requirements. Progress toward completion of Prior Action Checklist items will be regularly assessed by GSCA staff. In addition, the school should anticipate a minimum of one Pre-Opening site visit. For additional guidance, please refer to the Prior Action Checklist attached to the charter agreement and posted on the GSCA website.

Formal Site Visit: Formal site visits are conducted in the spring of each year to gauge the school's progress toward meeting academic success, financial health, and organizational compliance goals. Formal site visits are conducted by GSCA staff members and/or their authorized designees, who interview key stakeholders, conduct classroom observations, review documentation, and attend a Board meeting. Written feedback is provided to the Board of Directors and school leadership.

Monitoring Site Visit: In addition to Formal site visits, GSCA staff members conduct informal Monitoring site visits for follow-up oversight, special events, and general check-ins. One Monitoring site visit is held each year and consists of a meeting with the school's leadership and staff. In addition, the GSCA may conduct Monitoring site visits at other times throughout the year to fulfill its authorizer duties. Reasons for additional monitoring visits may include, but are not limited to: follow-up on implementation of improvement plans, documentation of best practices, or investigation of a complaint. Such visits may be impromptu or without notice. At its discretion, GSCA staff may opt not to conduct Monitoring visits for schools that are performing well across all Accountability Plan dimensions.

End-of-Term Site Visit: The End-of-Term site visit is conducted by GSCA staff and expert external evaluators in the Fall of Year 7. This site visit is conducted after a school has submitted a Charter Renewal Application and provides a summative evaluation of the school's performance over the entire term of the charter. Written feedback is provided to the Board of Directors and school leadership and is used to determine charter renewal recommendations. External evaluator fees are paid by the GSCA.

Reporting Requirements

GSCA reporting requirements are designed to ensure prudent authorizer oversight without overburdening school leaders. State law requires charter schools and the GSCA to submit a variety of data to the Indiana Department of Education throughout the year. In addition, the GSCA requires the submission of an annual report containing school data and supplemental information that helps to provide a comprehensive picture of overall school performance. The GSCA also requires quarterly financial reporting as described in the charter agreement. Full reporting requirement details are posted on the GSCA website.

School Performance Report

A GSCA-authorized charter school's performance is assessed in accordance with Accountability Plan goals and measures, and through a combination of written reports, data submission, and site visits. Each year, the GSCA will create a School Performance Report that summarizes the school's status in terms of academic success, financial health, and organizational compliance. The School Performance Report serves as the basis for the creation of annual performance targets as required by IC § 20-24-4-1.

The School Performance Report also provides important information about the school to families, students, and the broader community. The Report for each school will be posted on the GSCA website, and will be used to inform the production of the GSCA's annual Accountability Report as required by IC § 20-24-9.

Acknowledgements

In devising its Accountability System, including the charter agreement, site visit protocol, Prior Action Checklist, and Accountability Plan indicators, the GSCA consulted with the National Association of Charter School Authorizers ("NACSA") and benchmarked with top-performing authorizers from around the country. Version 1 of the GSCA Accountability System was adopted in January 2012.

In September 2012, the GSCA was awarded an implementation grant from NACSA's Fund for Authorizing Excellence, in part to revise its academic indicators to align with best practices and changes to Indiana's accountability landscape following Indiana's receipt of an ESEA waiver from the U.S. Department of Education. The GSCA contracted with national education policy and management consulting firm Public Impact to conduct this work. With Public Impact's assistance, Version 2 of the GSCA Accountability System was completed and adopted in December 2012.

The GSCA gratefully acknowledges the assistance and guidance of the following organizations: NACSA, Public Impact, the Charter Schools Institute at The State University of New York ("SUNY"), the Charter School Authorizing Program at Volunteers of America ("VOA") of Minnesota, and the Charter Schools Office of the Indianapolis Mayor's Office. In addition, we are indebted to the Accountability staff at the Indiana Department of Education for their assistance in aligning applicable GSCA Accountability Plan performance metrics with Indiana's K-12 public school accountability standards.

Accountability Plan

I. Overview

The single most important factor that the Grace Schools Charter Authority, LLC (GSCA) considers in assessing school performance and making charter renewal determinations is the school's record in generating successful student achievement outcomes. Regardless of the grade levels a school is providing, the expectation is that most, if not all, of the students will leave the school fully prepared and educated for the next step in their academic careers—middle school, high school, or post-secondary education. For those high school students who do not intend to enroll in post-secondary education, the expectation is that most, if not all, of these students will leave the school fully prepared for employment.

In order to determine whether a school has met this high standard, each school that the GSCA authorizes is required to enter into a performance agreement. This agreement's primary purpose is to outline the specific student achievement goals that a school agrees to meet and the specific outcome measures that define what constitutes meeting these goals. The agreement also describes financial health and organizational compliance goals and measures. This agreement, known as the "Accountability Plan," becomes part of the school's charter. Under the GSCA Accountability System, schools are required to report their yearly progress in meeting the goals contained in their Accountability Plan through an annual report, referred to as the Accountability Plan Progress Report.

In establishing high standards for renewal, the GSCA requires that the Accountability Plan for each of its charter schools contains a common set of goals, along with specific measures, that set the same criteria for success for each school. These required outcome measures represent the GSCA's expectations for student learning and achievement at the time of renewal. If necessary and at its sole discretion, the GSCA may agree to amend certain goals or measures to align with a unique charter school model (e.g., dropout recovery model).

This document provides detailed information about the Accountability Plan and its performance dimensions.

II. Outcome Measures

The GSCA's Accountability System is developed upon the principle that schools should be held accountable for the academic results they achieve, not for what actions they take to achieve these outcomes. Therefore, the GSCA Accountability Plan is built upon outcome measures that focus on student achievement as a result of schools' programmatic and organizational practices. For example, outcome measures do not describe how much time students have spent reading, how much money was spent on reading programs, or even what students read (all input measures) but rather assess the end product, i.e., how much students improved in their ability to read.

There are three types of outcome measures used in the Accountability Plan: Absolute, Comparative, and Growth.

- **Absolute** measures use fixed criteria by which the school's performance is measured. These measures are based on absolute standards, that is, mastery at a specified level of skill and knowledge on state examinations. Students show proficiency by performing at a given, pre-determined level. To the extent that the school's mission is to prepare students for success in middle school, high school and beyond, a large percent of students taking state assessments are expected to show proficiency in order for the school to be deemed successful in preparing students for future educational achievement.
- **Comparative** measures weigh the school's performance against that of other selected schools and student populations. In addition to examining academic goals in terms of absolute student achievement, GSCA authorized charter schools must also compare their students' performance on the state examinations to that of comparable schools as defined by certain sub-group factors.
- **Growth** measures examine progress towards an absolute target based on year-to-year growth of the same students. Unlike the absolute measure of proficiency, the growth outcome measure is intended to chart student progress attributable to the impact of a school's instructional program. To determine student progress, the outcome is expressed as the year-to-year difference between pre-test and post-test scores of the same students. Since growth measures compare a school's students to themselves at an earlier point in time, they factor out demographic issues that influence performance, making growth measures particularly useful for schools serving at-risk students.

A well-defined outcome measure must be specific, clearly and concisely stated, and easily understood. Academic subject measures should be tied to academic standards that specify what students should know and be able to do in a subject or content area at a specified grade or other grouping level.

Examples of Outcome Measures

- **Absolute:** Each year, 80 percent of all tested students who have been enrolled at the school for a minimum of 162 days will pass the English/Language Arts component of the ISTEP+.
- **Comparative:** Each year, the percentage of students passing the Algebra 1 ECA will exceed the passing percentage of students from comparable schools.
- **Growth:** Each year, the median Student Growth Percentile as measured by the Indiana Growth Model is between 50 and 65.

III. Performance Dimensions Overview

The Accountability Plan sets forth the goals and measures for the school and is used to evaluate the school's academic performance, financial health, and organizational compliance. At its core, the Accountability Plan poses three critical questions:

- Is the school's educational program a success?
- Is the school in good financial health?
- Is the organization in compliance with applicable laws and regulations, and with the charter?

As stated above, the single most important factor that the GSCA considers in making charter renewal determinations at the end of the seven-year charter term is the school's record in

generating successful student academic achievement outcomes. However, it is also important that the school maintains good financial health and remains compliant with legal and contractual obligations. Therefore, a school's performance will be assessed across all three dimensions.

Each Accountability Plan performance dimension has multiple indicators of success and the charter school's performance on each indicator will be scored as:

- Exceeds standard;
- Meets standard;
- Improvement Necessary; and
- Does Not Meet Standard.

Accountability Plan performance dimensions will serve as the basis for site visit questions, annual reports, and all performance-related assessments of the school over the seven-year charter term.

IV. Academic Performance

The Accountability Plan for all schools is rooted in Indiana's comprehensive K-12 accountability system (A-F Model) under Public Law 221. The A-F Model is built upon proficiency, improvement and growth indicators that address the two major academic subjects of English/Language Arts and Mathematics. For high schools, the A-F Model also incorporates college and career readiness indicators. The GSCA Accountability Plan includes additional indicators outside of the A-F Model for grades K-3 and 9-12, to ensure the GSCA has a rich data set with which to evaluate school performance over the course of the charter term and from which to base its charter renewal decisions.

At their discretion, schools may choose to add additional academic goals and measures; however, supplemental measures will not supplant or dilute the GSCA's consideration of the required academic measures.

School Levels

Elementary and Middle Schools

The Accountability Plan for both elementary and middle schools begins with a grade level designation under the A-F Model (for example, a school is rated a B or a C). The components of this grade are then disaggregated so that the GSCA can view proficiency and growth outcome measures based on the results of state assessments in English/Language Arts and Mathematics. For elementary schools, there is an additional required absolute outcome measure on the state's IREAD-3 assessment for students in the 3rd grade. Academic measures will only be calculated for those students who have been enrolled at the school for at least 162 days, in order to assess the impact of the school at which the student is currently enrolled. Growth in grades 3-8 is calculated using Indiana's Growth Model. Once Indiana incorporates growth for grades K-2 into the Growth Model, growth in these grades will be assessed using Indiana's Growth Model.

High Schools

The Accountability Plan for charter high schools begins with a grade level designation under the A-F Model (for example, a school is rated a B or a C). The components of this grade are then disaggregated so that the GSCA can view proficiency (absolute and comparative) and improvement outcome measures based on the results of state assessments in English/Language Arts and Mathematics. In addition, high schools are assessed on their graduation rates as well as on college and career readiness indicators.

High school academic proficiency is assessed using a 10th grade cohort as defined by the Department of Education in accordance with Public Law 221. "10th grade cohort" means the class of students who are in their second year of high school. Accountability standards for the 10th grade cohort stipulate that academic measures will only be calculated for those students who have been enrolled at the school for at least 162 days, in order to assess the impact of the school at which the student is currently enrolled. College and career readiness in grades 9-12 is assessed using a combination of the following assessment tools: the College Board's College Readiness Pathway suite (PSAT and SAT), the ACT Educational Planning and Assessment System (PLAN and ACT), the Advanced Placement (AP) exam, the International Baccalaureate (IB) exam, dual-credit accumulation and industry certifications. Note that dual-credit courses and industry certifications must be selected from the approved list posted on the GSCA website. Once Indiana incorporates growth for grades 9-12 into the Growth Model, growth in these grades will be assessed using Indiana's Growth Model.

Finally, GSCA charter high school graduation rate accountability is based on how the graduation rate is defined in Indiana statute. Specifically, Indiana Code § 20-26-13-12 provides that the Department of Education shall calculate, for each public and accredited nonpublic high school, an estimated graduation rate that is determined by the total number of graduates for a particular year divided by the total number of students enrolled in Grade 9 at the school three years before that year. See the Indiana Department of Education's website for more information:

<http://www.doe.in.gov/gradrate/>

V. OPTIONAL ACADEMIC OUTCOMES MEASURES

Accountability Plan outcome measures are established by the GSCA and go into effect for the initial seven-year charter term once the charter agreement is executed. As described under Section IV: Academic Performance, a school may wish to establish additional academic outcomes measures by which school performance will also be assessed. However, applicants should note that any supplemental measures will not supplant or dilute the GSCA's consideration of the required measures in its evaluation of the goals.

Any school wishing to add optional academic measures must submit draft measures to the GSCA by March 15 of the school's first operational year. GSCA staff will review any draft measures and provide feedback to the school. The final version of any optional measures must be submitted to the GSCA by May 15 of the school's first operational year.

VI. TRIGGERS FOR FOLLOW-UP REVIEW AND CORRECTIVE ACTION

The GSCA carefully monitors each school's performance throughout the seven-year charter term. The following outcomes will result in immediate follow-up review and may result in the school's submission of a Corrective Plan as described in Section 15.4 of the charter agreement. Follow-up review will take into consideration unique characteristics of individual school models.

Category 1: Academic Success

For All Schools

- Indicator 1.1.a, A-F Model Grade. A school is graded an F in any given year.
- Indicator 1.1.a, A-F Model Grade. A school is graded a D for two years in a row.

For Elementary and Middle Schools

- Indicators 1.2.a., 1.2.b., 1.2.c., 1.3.a., 1.3.b., 1.3.c., or 1.3.d. A school scores a Does Not Meet Standard on individual measures within two or more separate indicators for two years in a row.

For High Schools

- Indicators 1.2.a., 1.2.b., 1.2.c., 1.4.a., 1.4.b., 1.4.c., or 1.4.d. A school scores a Does Not Meet Standard on individual measures within two or more separate indicators for two years in a row.

Note that follow-up review will not be triggered solely on the basis of the comparative measures described in Indicators 1.2.d., 1.2.e., 1.2.f., or 1.2.g. Instead, outcomes on these measures will supplement the GSCA's assessment of a school's performance as determined by the absolute proficiency, growth and (if applicable) college and career readiness indicators and measures.

Category 2: Financial Health

For All Schools

- All Indicators: A school scores two or more "Does Not Meet Standard" in the same year.
- All Indicators: A school scores one "Does Not Meet Standard" for two years in a row.

Category 3: Organizational Compliance

For All Schools

- All Indicators: A school scores one or more "Does Not Meet Standard" in the same year.

VII. CONTINUOUS MONITORING OF ACCOUNTABILITY SYSTEM

State Accountability Evolution

Indiana's comprehensive K-12 accountability system under Public Law 221 is undergoing an evolution. Of particular note:

- Indiana recently adopted a Growth Model for grades 3-8 and is in the process of adding growth metrics for grades K-2 and 9-12. Once these metrics are finalized, the GSCA accountability system will adopt the Growth Model across the K-12 continuum.
- Indiana is a participant in the Partnership for Assessment of Readiness for College and Careers (PARCC), a consortium of states working together to develop a common set of K-12 assessments in English and math anchored in what it takes to be ready for college and careers. The PARCC assessments should be ready for states to administer during the 2014-15

school year. This may impact the GSCA accountability system during the first seven-year charter term for some of its schools.

The GSCA will communicate transparently with its authorized charter schools regarding any material changes to the GSCA Accountability System resulting from any changes in Indiana law.

Annual Review of GSCA Accountability System

As part of its standard operating procedure, the GSCA has committed to an annual review of its Accountability Plan to ensure the indicators and measures used by the GSCA comply with federal and state accountability requirements and align with best practices promulgated by NACSA. The GSCA will communicate transparently with its authorized charter schools regarding any material changes to the GSCA Accountability System resulting from any changes in GSCA policy.

VIII. INDIANA STATE ASSESSMENTS OVERVIEW

A complete list of Indiana's required K-12 public school state assessments can be found on the Indiana Department of Education's website: www.doe.in.gov. Below, we provide descriptions of the primary state assessments, excerpted from the IDOE website.

IREAD-3

The purpose of the Indiana Reading Evaluation And Determination (IREAD-3) assessment is to measure foundational reading standards through grade three. Based on the Indiana Academic Standards, IREAD-3 is a summative assessment that was developed in accordance with Public Law 109 which "requires the evaluation of reading skills for students who are in grade three beginning in the Spring of 2012 to ensure that all students can read proficiently before moving on to grade four."

ISTEP+

The purpose of the Indiana Statewide Testing for Educational Progress Plus (ISTEP+) program is to measure student achievement in the subject areas of English/Language Arts, Mathematics, Science*, and Social Studies**. In particular, ISTEP+ reports student achievement levels according to the Indiana Academic Standards that were adopted in November 2000 by the Indiana State Board of Education. An Applied Skills Assessment and a Multiple-Choice Assessment are used to measure these standards; they are required components of the ISTEP+ program.

ISTEP+ ECA

The ISTEP+ End-of-Course Assessments (ECAs) are criterion-referenced assessments developed specifically for students completing their instruction in Algebra I, Biology I, or English 10.

CATEGORY 1: ACADEMIC SUCCESS

The single most important factor that the Grace Schools Charter Authority, LLC ("GSCA") considers in making charter renewal determinations is the school's record in generating successful student achievement outcomes.

Outcome measures in the Academic Success category assess school performance across two dimensions: student achievement (absolute and comparative) and student growth or improvement. First, a school is rated according to Indiana’s K-12 Accountability System (“A-F Model”) under Public Law 221. The individual components of the A-F Model are then disaggregated to enable the GSCA to assess a school’s performance over time across discrete academic indicators that feed into a school’s letter grade. *IMPORTANT NOTE: A new charter school is automatically graded under the A-F Model according to growth only during its first three years of operation. A school may choose to opt out of this approach and choose to be graded according to the standard A-F Model calculation, which measures both proficiency and growth. Once a school opts out of a “growth only” calculation, the school may not then choose to opt back in. Schools are encouraged to contact the IDOE Office of Accountability with any questions about opting out of the growth only default category.

In addition, because Indiana has adopted a high stakes reading test in the third grade, the GSCA Accountability Plan assesses student proficiency on the IREAD assessment in grade 3. Finally, because Indiana’s state assessments for high schools do not measure performance beyond the 10th grade cohort, the GSCA Accountability Plan measures student proficiency utilizing a combination of the following assessment tools: the College Board’s College Readiness Pathway suite (PSAT and SAT), the ACT Educational Planning and Assessment System (PLAN and ACT), the Advanced Placement (AP) exam, the International Baccalaureate (IB) exam, dual-credit accumulation and industry certifications. Note that each of these assessments, apart from the College Board suite and the ACT System, are incorporated into Indiana’s A-F Model and feed into a high school’s overall letter grade.

1.1. STATE AND FEDERAL ACCOUNTABILITY

1.1.a. The school meets standards according to Indiana’s K-12 Accountability System (A-F Model) under Public Law 221.

Exceeds Standard:

- School received an A under P.L. 221.

Meets Standard:

- School received a B under P.L. 221.

Improvement Necessary:

- School received a C under P.L. 221.

Does Not Meet Standard:

- School received a D or F under P.L. 221.

Note: If a school receives an F in any given year, immediate follow-up review is required.

DATA SOURCE: Indiana Department of Education.

1.2. STUDENT ACHIEVEMENT (PROFICIENCY)

1.2.a. Students achieve proficiency on state assessments in English Language Arts or English 10.

Exceeds Standard:

- 90% or more of students met or exceeded proficiency.

Meets Standard:

- Between 80% and 89% of students met or exceeded proficiency.

Improvement Necessary:

- Between 70% and 79% of students met or exceeded proficiency.

Does Not Meet Standard:

- Less than 70% of students met or exceeded proficiency.

1.2.b. Students achieve proficiency on state assessments in Math or Algebra 1.

Exceeds Standard:

- 90% or more of students met or exceeded proficiency.

Meets Standard:

- Between 80% and 89% of students met or exceeded proficiency.

Improvement Necessary:

- Between 70% and 79% of students met or exceeded proficiency.

Does Not Meet Standard:

- Less than 70% of students met or exceeded proficiency.

1.2.c. (Grade 3 only) Students achieve proficiency on the IREAD-3 state assessment.

Exceeds Standard:

- More than 90% of students passed the IREAD assessment in grade 3.

Meets Standard:

- Between 81% and 90% of students passed the IREAD assessment in grade 3.

Improvement Necessary:

- Between 71% and 80% of students passed the IREAD assessment in grade 3.

Does Not Meet Standard:

- 70% or less of students passed the IREAD assessment in grade 3.

1.2.d. Students perform better on state examinations in English Language Arts or English 10 than students at comparable schools.

NOTE: “Comparable schools” are schools that serve similar populations of students, as defined by the percentage of students within +/-5% of the same socio-economic, ELL and SPED status. This percentage range may be expanded at the GSCA’s discretion, in consultation with the school, to ensure the data set is large enough to conduct comparative analyses.

Exceeds Standard:

- The percentage of proficient students at the school is higher than the percentage at comparable schools by at least 15.0 percentage points.

Meets Standard:

- The percentage of proficient students at the school is higher than the percentage at comparable schools by 5.0 to 14.9 percentage points.

Improvement Necessary:

- The percentage of proficient students at the school meets or is higher than the percentage at comparable schools by up to 4.9 percentage points.

Does Not Meet Standard:

- The percentage of proficient students at the school is lower than the percentage at comparable schools. 1.2.e. Students perform better on state examinations in Math or Algebra 1 than students at comparable schools. NOTE: “Comparable schools” are schools that serve similar populations of students, as defined by the percentage of students within +/-5% of the same socio-economic, ELL and SPED status. This percentage range may be expanded at the GSCA’s discretion, in consultation with the school, to ensure the data set is large enough to conduct comparative analyses.

Exceeds Standard:

- The percentage of proficient students at the school is higher than the percentage at comparable schools by at least 15.0 percentage points.

Meets Standard:

- The percentage of proficient students at the school is higher than the percentage at comparable schools by 5.0 to 14.9 percentage points.

Improvement Necessary:

- The percentage of proficient students at the school meets or is higher than the percentage at comparable schools by up to 4.9 percentage points.

Does Not Meet Standard:

- The percentage of proficient students at the school is lower than the percentage at comparable schools.

1.2.f. Students in all eligible subgroups (FRL, ELL, SPED, and race/ethnicity) achieve proficiency on state assessments in English Language Arts or English 10. NOTE: Eligible subgroups include at least 10 students.

Exceeds Standard:

- 90% or more of students in subgroups met or exceeded proficiency.

Meets Standard:

- Between 80% and 89% of students in subgroups met or exceeded proficiency.

Improvement Necessary:

- Less than 80% of students in subgroups met or exceeded proficiency AND subgroup proficiency rates met or exceeded the 40th percentile statewide in terms of subgroup proficiency results AND the median subgroup SGP is 36 or greater.

Does Not Meet Standard:

- Less than 80% of students in subgroups met or exceeded proficiency AND EITHER subgroup proficiency rates fell below the 40th percentile statewide in terms of subgroup proficiency results OR the median subgroup SGP is less than 36.

1.2.g. Students in all eligible subgroups (FRL, ELL, SPED, and race/ethnicity) achieve proficiency on state assessments in Math or Algebra 1.

NOTE: Eligible subgroups include at least 10 students.

Exceeds Standard:

- 90% or more of students in subgroups met or exceeded proficiency.

Meets Standard:

- Between 80% and 89% of students in subgroups met or exceeded proficiency.

Improvement Necessary:

- Less than 80% of students in subgroups met or exceeded proficiency AND subgroup proficiency rates met or exceeded the 40th percentile statewide in terms of subgroup proficiency results AND the median subgroup SGP is 36 or greater.

Does Not Meet Standard:

- Less than 80% of students in subgroups met or exceeded proficiency AND EITHER subgroup proficiency rates fell below the 40th percentile statewide in terms of subgroup proficiency results OR the median subgroup SGP is less than 36.

DATA SOURCES: Indiana Department of Education for results from all state assessments, including Indiana Statewide Testing for Educational Progress Plus (ISTEP+), IMAST, ISTAR, End of Course Assessments (ECAs), and IREAD.

1.3. STUDENT PROGRESS OVER TIME (GROWTH)

1.3.a. (Grades 3-8 only) The school's lowest performing quartile makes expected annual growth in English/Language Arts to maintain or achieve proficiency, as measured by Indiana's Growth Model and reported through Student Growth Percentiles (SGP).

Exceeds Standard:

- The median SGP of the lowest 25 percent of students in the school is at least 66.

Meets Standard:

- The median SGP of the lowest 25 percent of students in the school is between 50 and 65.

Improvement Necessary:

- The median SGP of the lowest 25 percent of students in the school is between 36 and 49.

Does Not Meet Standard:

- The median SGP of the lowest 25 percent of students in the school is less than 36.

1.3.b. (Grades 3-8 only) The school's lowest performing quartile makes expected annual growth in Math to maintain or achieve proficiency, as measured by Indiana's Growth Model and reported through Student Growth Percentiles (SGP).

Exceeds Standard:

- The median SGP of the lowest 25 percent of students in the school is at least 66.

Meets Standard:

- The median SGP of the lowest 25 percent of students in the school is between 50 and 65.

Improvement Necessary:

- The median SGP of the lowest 25 percent of students in the school is between 36 and 49.

Does Not Meet Standard:

- The median SGP of the lowest 25 percent of students in the school is less than 36.

1.3.c. (Grades 3-8 only) The school's top performing 75% makes expected annual growth in English/Language Art, as measured by Indiana's Growth Model and reported through Student Growth Percentiles (SGP).

Exceeds Standard:

- The median SGP of the top-performing 75 percent of students in the school is at least 66.

Meets Standard:

- The median SGP of the top-performing 75 percent of students in the school is between 50 and 65.

Improvement Necessary:

- The median SGP of the top-performing 75 percent of students in the school is between 36 and 49.

Does Not Meet Standard:

- The median SGP of the top-performing 75 percent of students in the school is less than 36.

1.3.d. (Grades 3-8 only) The school's top performing 75% makes expected annual growth in Math, as measured by Indiana's Growth Model and reported through Student Growth Percentiles (SGP).

Exceeds Standard:

- The median SGP of the top-performing 75 percent of students in the school is at least 66.

Meets Standard:

- The median SGP of the top-performing 75 percent of students in the school is between 50 and 65.

Improvement Necessary:

- The median SGP of the top-performing 75 percent of students in the school is between 36 and 49.

Does Not Meet Standard:

- The median SGP of the top-performing 75 percent of students in the school is less than 36.

DATA SOURCES: Indiana's Growth Model for grades 3-8.

ADDITIONAL ACADEMIC INDICATORS FOR HIGH SCHOOLS

1.4. COLLEGE AND CAREER READINESS (High Schools Only)

1.4.a. Student performance, dual-credit accumulation and/or industry certification reflects college and career readiness, based on the percentage of non-duplicated graduating students in the current school year achieving at least one of the following college and career readiness indicators:

- Scored a composite PSAT score of at least 145 or 152 (if administered in either 10th or 11th grade) and a combined SAT score of at least 1550.
- Scored minimum PLAN composite score of 18 and minimum ACT composite score of 21.
- Scored a 3, 4 or a 5 on the AP exam.
- Scored a 4, 5, 6 or 7 on the IB exam.
- Earned 3 or more college transcribed and verifiable credits from the Priority Liberal Arts or CTE course lists.
- Earned an industry certification approved by the GSCA.

Exceeds Standard:

- 90% or more of graduating students in the current school year achieved at least one of the college and career readiness indicators.

Meets Standard:

- Between 75% and 89.9% of graduating students in the current school year achieved at least one of the college and career readiness indicators.

Improvement Necessary:

- Between 50% and 74.9% of graduating students in the current school year achieved at least one of the college and career readiness indicators.

Does Not Meet Standard:

- Less than 50% of graduating students in the current school year achieved at least one of the college and career readiness indicators.

1.4.b. Students graduate from high school (as defined by the state's four-year graduation rate).

Exceeds Standard:

- 90% or more of students graduated from high school in the current school year.

Meets Standard:

- 80% to 89.9% of students graduated from high school in the current school year.

Improvement Necessary:

- 70% to 79.9% of students graduated from high school in the current school year.

Does Not Meet Standard:

- Less than 70% of students graduated from high school in the current school year.

1.4.c. High school graduates enroll in post-secondary institutions or are employed within five months of graduation (includes military service).

Exceeds Standard:

- 90% or more of high school graduates enrolled in a post-secondary institution or were employed within five months of graduation.

Meets Standard:

- 80% to 89% of high school graduates enrolled in a post-secondary institution or were employed within five months of graduation.

Improvement Necessary:

- 70% to 79% of high school graduates enrolled in a post-secondary institution or were employed within five months of graduation.

Does Not Meet Standard:

- Less than 70% of high school graduates enrolled in a post-secondary institution or were employed within five months of graduation.

1.4.d. High school graduates who received a waiver diploma also received an GSCA-approved industry certification.

Exceeds Standard:

- All high school graduates who received a waiver diploma also received an GSCA-approved industry certification.

Meets Standard:

- 95.0% to 99.9% of high school graduates who received a waiver diploma also received a GSCA-approved industry certification.

Improvement Necessary:

- 80.0% to 94.9% of high school graduates who received a waiver diploma also received a GSCA-approved industry certification.

Does Not Meet Standard:

- Less than 80% of high school graduates who received a waiver diploma also received a GSCA-approved industry certification.

DATA SOURCES: Indiana Department of Education, Student Tracker, charter school’s annual Accountability Plan Progress Report.

CATEGORY 2: FINANCIAL HEALTH

A school that is in financial distress is at risk for closing down and disrupting the education of enrolled students. Therefore, assessing the financial health of a charter school is an integral part of an authorizer’s accountability responsibilities.

The following table summarizes the indicators by which the financial health of a school is assessed by the GSCA. A school that scores two or more “Does Not Meet Standard” in one year, or one “Does Not Meet Standard” for two years in a row, is in questionable financial health and warrants an in-depth financial review and possible corrective action. Note that some financial indicators are absolute, and a school either does or does not meet the standard.

Finally, please note that several of the indicators include a three year trend analysis. Therefore, the Year 1 and Year 2 outcomes consider financial data from prior fiscal years. The process for evaluating schools that have been open for less than five years is addressed in the individual indicators.

NOTE: Throughout this document, financial statements will be referred to in the common, for-profit nomenclature for easier reference. For example, the Balance Sheet is synonymous with the Statement of Financial Position and also with the Statement of Net Assets.

GSCA FINANCIAL HEALTH INDICATORS

Combined Financial Indicators

Near-Term Indicators

- 2.1.a. Current Ratio
- 2.1.b. Days Cash on Hand
- 2.1.c. Enrollment Variance
- 2.1.d. Debt Default

Sustainability Indicators

- 2.2.a. Total Margin
- 2.2.b. Debt to Asset Ratio
- 2.2.c. Cash Flow
- 2.2.d. Debt Service Coverage Ratio

DATA SOURCES: Audited financial statements, including notes to the audited financial statements; charter school board-approved budget with enrollment targets; actual enrollment information; annual debt schedule indicating the total principal and interest due.

2.1 NEAR-TERM INDICATORS

2.1.a. Current Ratio:

Current Assets divided by Current Liabilities

Definition: The current ratio depicts the relationship between a school's current assets and current liabilities. The current ratio measures a school's ability to pay its obligations over the next 12 months. A current ratio of greater than 1.0 indicates that the school's current assets exceed its current liabilities, thus indicating ability to meet current obligations. A ratio of less than 1.0 indicates that the school does not have sufficient current assets to cover the current liabilities and is not in a satisfactory position to meet its financial obligations over the next 12 months.

Meets Standard (in one of two ways):

- Current Ratio is greater than 1.1.
- Current Ratio is between 1.0 and 1.1 and one-year trend is positive (current year ratio is higher than last year's).

NOTE: For schools in their first year of operation, the current ratio must be greater than 1.1.

Does Not Meet Standard:

- Does not meet passing options.

NOTE: If the current ratio is less than 0.9, follow-up review is required.

2.1.b. Days Cash on Hand:

Cash divided by (Total Expenses-Depreciation Expense/365)

Definition: The days cash on hand ratio indicates how many days a school can pay its expenses without another inflow of cash. The days cash ratio tells authorizers whether or not the school has sufficient cash to meet its cash obligations. Depreciation expense is removed from the total expenses denominator because it is not a cash expense. This critical measure takes on additional importance in Indiana, given the reimbursement basis for many state and federal grants.

Meets Standard:

- 60 days cash.
- Between 30 and 60 days cash and one-year trend is positive.

NOTE: For schools in their first and second years of operation, they must have a minimum of 30 days cash.

Does Not Meet Standard:

- Days cash and trend do not match passing options above.

NOTE: If the school has less than 15 days cash, follow-up review is required.

2.1.c. Enrollment Variance:

Actual Enrollment divided by Enrollment Projection in Charter School Board-Approved Budget

Definition: Enrollment variance tells authorizers whether or not the school is meeting its enrollment projections. As enrollment is a key (often the key) driver of revenues, variance is important to track the sufficiency of revenues generated to fund ongoing operations.

The enrollment variance depicts actual versus projected enrollment. A school budgets based on projected enrollment but is funded based on actual enrollment; therefore, a school that fails to meet its enrollment targets may not be able to meet its budgeted expenses. Consistently falling short of enrollment projections may indicate that the school is failing to retain students from year-to-year or is not implementing an effective recruitment strategy. It also indicates that the school may lack sufficient financial and organizational planning expertise.

Meets Standard:

- Enrollment Variance equals or exceeds 95 percent in the most recent year.

Does Not Meet Standard:

- Enrollment Variance is less than 95 percent in the most recent year.

NOTE: If actual enrollment was less than 85% of planned enrollment in the recent year, follow-up review is required.

2.1.d. Debt Default

Definition: Debt default indicates whether or not a school is meeting debt obligations or covenants. This metric addresses whether or not a school is meeting its loan covenants and/ or is delinquent with its debt service payments. A school that cannot meet the terms of its loan may be in financial distress.

Meets Standard:

- School is not in default of loan covenant(s) and/or is not delinquent with debt service payments.

Does Not Meet Standard:

- School is in default of loan covenant(s) and/or is delinquent with debt service payments.

2.2 SUSTAINABILITY INDICATORS

2.2.a. Total Margin:

Net Income divided by Total Revenue

Aggregated Total Margin: Total Three-Year Net Income divided by Total Three-Year Revenues

Definition: Total margin measures the deficit or surplus a school yields out of its total revenues; in other words, it measures whether or not the school is living within its available resources.

The total margin measures whether a school operates at a surplus (more total revenues than expenses) or a deficit (more total expenses than revenues) in a given time period. The total margin is important to track, as schools cannot operate at deficits for a sustained period of time without risk of closure. Though the intent of a school is not to make money, it is important for charters to build, rather than deplete, a reserve to support growth or sustain the school in an uncertain funding environment.

The aggregated three-year total margin is helpful for measuring the long-term financial stability of the school by smoothing the impact of single-year fluctuations on the single-year total margin indicator. The performance of the school in the most recent year, however, is indicative of the sustainability of the school, thus the school must have a positive total margin in the most recent year to meet the standard.

Meets Standard (in one of two ways):

- Aggregated three-year Total Margin is positive and the most recent year Total Margin is positive.
- Aggregated three-year Total Margin is greater than -1.5%, the trend is positive for the last two years, and the most recent year Total Margin is positive.

NOTE: For schools in their first and second year of operation, the cumulative Total Margin must be positive.

Does Not Meet Standard:

- Profit margin and trend do not meet passing options.

NOTE: Follow-up review is required under the following circumstances (in one of two ways):

- Aggregated three-year Total Margin is less than or equal to -1.5%.
Note, this calculation is: $(\text{Total 3 year net income})/(\text{Total 3 year revenues})$
- The most recent year Total Margin is less than -10%.

2.2.b. Debt to Asset Ratio:
Total Liabilities divided by Total Assets

Definition: The debt to asset ratio measures the amount of liabilities a school owes versus the assets it owns; in other words, it measures the extent to which the school relies on borrowed funds to finance its operations.

The debt to asset ratio compares the school's liabilities to its assets. Simply put, the ratio demonstrates what a school owes against what it owns. A lower debt to asset ratio generally indicates stronger financial health.

Meets Standard:

- Debt to Asset Ratio is less than 0.9.

Does Not Meet Standard:

- Debt to Asset Ratio is greater than 0.9.

NOTE: If the Debt to Asset Ratio is greater than 1.0, follow-up review is required.

2.2.c. Cash Flow

Definition: The cash flow measure indicates a school's change in cash balance from one period to another. Cash flow indicates the trend in the school's cash balance over a period of time. This measure is similar to days cash on hand but indicates long-term stability versus near-term. Since cash flow fluctuations from year to year can have a long-term impact on a school's financial health, this metric assesses both multi-year cumulative cash flow and annual cash flow. The preferred result is greater than zero. Similar to Total Margin, this measure is not intended to encourage amassing resources instead of deploying them to meet the mission of the organization, but rather to provide for stability in an uncertain funding environment.

Meets Standard (in one of two ways):

- Three-year cumulative cash flow is positive and cash flow is positive each year.
- OR
- Three-year cumulative cash flow is positive, cash flow is positive in one of two years, and cash flow in the most recent year is positive.

NOTE: Schools in their first and second year of operation must have positive cash flow.

Does Not Meet Standard:

- Three-year cumulative cash flow is positive, but does not meet standard.

NOTE: If the school's three-year cumulative cash flow is negative, follow-up review is required.

2.2.d. Debt Service Coverage Ratio:

(Net Income + Depreciation + Interest Expense)/(Annual Principal, Interest, and Lease Payments)

Definition: The debt service coverage ratio indicates a school's ability to cover its debt obligations in the current year. This ratio measures whether or not a school can pay the principal and interest due on its debt based on the current year's net income. Depreciation expense is added back to the net income because it is a non-cash transaction and does not actually cost the school money. The interest expense is added back to the net income because it is one of the expenses an entity is trying to pay, which is why it is included in the denominator.

Meets Standard:

- Debt Service Coverage Ratio is equal to or exceeds 1.2.

Does Not Meet Standard:

- Debt Service Coverage Ratio is less than 1.2.

CATEGORY 3: ORGANIZATIONAL COMPLIANCE

A school that is in material non-compliance with legal or contractual obligations is at risk for closing down and disrupting the education of enrolled students. Therefore, assessing the organizational compliance of a charter school is an integral part of an authorizer's accountability responsibilities.

Authorizers are faced with absolute standards for compliance: legal and contractual requirements are either met or they are not. In assessing a school's organizational compliance across the indicators listed below, the GSCA will adopt a reasonable measure of sufficiency that faults schools for material non-compliance only.

I. STUDENT PROCEDURES

3.1 ADMISSIONS, ENROLLMENT & RETENTION

3.1.a. The school has conducted lawful, unbiased admissions, enrollment and retention processes including conducting appropriate randomized lotteries where required?

Meets Standard:

The school has materially complied with admissions, enrollment and retention requirements based on applicable laws, rules, and regulations as well as any relevant provisions of the charter agreement. Any shortcomings or failures to comply have been inadvertent and any adverse consequences have been promptly remedied.

- Recruitment
 - Followed fair and open recruitment practices
 - Did not seek or use information in ways that would have been discriminatory or otherwise contrary to law
- Lottery process
 - Implemented all required admissions preferences and only allowable discretionary preferences
 - Carried out lottery consistent with applicable rules and policies
- Waiting list procedures
 - Compiled and utilized waiting list consistent with applicable rules and policies
- Enrollment
 - Enrolled students in accordance with a lawful admissions policy, lottery results, and waiting list results
- Retention
 - Did not for any reason attempt to persuade or "counsel out" students either in advance of enrollment or thereafter

DATA SOURCES: Signed statement of assurances submitted annually to GSCA; documented complaints submitted to the school, the GSCA or the Indiana Department of Education, as well as any follow-up reports addressing these complaints.

Does Not Meet Standard:

The school has failed, in one or more material respects, to comply with admissions, enrollment and retention requirements based on applicable laws, rules, and regulations as well as any relevant provisions of the charter agreement. Such shortcomings or failures have had adverse consequences and/or have not been promptly remedied.

3.2. STUDENT ATTENDANCE AND DISCIPLINE

3.2.a. The school met attendance goals.

Meets Standard:

- In the previous year, school-wide attendance was 95% or better.

Approaches Standard:

- In the previous year, school-wide attendance was between 90% and 94%.

Does Not Meet Standard:

- In the previous year, school-wide attendance was below 90%.

3.2.b. The school followed appropriate and lawful student discipline processes.

Meets Standard:

- The school has conducted suspensions and expulsions in material compliance with applicable laws, rules, and regulations as well as any relevant provisions of the charter agreement. The school has promptly and effectively remedied shortcomings when identified.

Does Not Meet Standard:

- The school has conducted suspensions and/or expulsions in violation of applicable laws, rules, and regulations as well as any relevant provisions of the charter agreement. The school has failed to promptly and effectively remedy shortcomings when identified.

DATA SOURCES: Indiana Department of Education; signed statement of assurances submitted annually to GSCA; documented complaints submitted to the school, the GSCA or the Indiana Department of Education, as well as any follow-up reports addressing these complaints.

II. STUDENT RIGHTS

3.3. SPECIAL EDUCATION

3.3.a. The school has respected the rights of students with disabilities under applicable laws, rules and regulations (including the Individuals with Disabilities Education Act, Section 504 of the Rehabilitation Act of 1973, and the Americans with Disabilities Act, and Article 7) and provisions of its charter agreement.

Meets Standard:

- The school consistently treated students with identified disabilities and those suspected of having a disability in accordance with applicable laws, rules and regulations as well as any relevant provisions of the charter agreement.
- Consistent with the school's status and responsibilities as a Local Educational Agency (LEA):
 - Identification: It consistently complied with rules relating to identification & referral
 - Operational Compliance: It consistently complied with rules relating to the academic program, assessments, discipline, and all other aspects of the school's program and responsibilities
 - IEPs: Student Individualized Education Plans and Section 504 plans were appropriately carried out, and confidentiality was maintained
 - Accessibility: Access to the school's facility and program was provided to students and parents in a lawful manner and consistent with their abilities
 - Funding: All applicable funding was secured and utilized in ways consistent with applicable laws, rules, regulations and provisions of the school's charter agreement
- Any areas of non-compliance were addressed promptly and effectively once identified.

Does Not Meet Standard:

- The school failed to implement its program in the manner described above. It failed to properly execute its duties as an LEA and/or consistently and equitably attend to the educational success of students with disabilities enrolled in the school.

DATA SOURCES: Indiana Department of Education; signed statement of assurances submitted annually to GSCA; documented complaints submitted to the school, the GSCA or the Indiana Department of Education, as well as any follow-up reports addressing these complaints.

3.4. ENGLISH LANGUAGE LEARNERS

3.4.a. The school has respected the rights of English Language Learner (ELL) students under all applicable laws, rules, regulations (including Title III of the Elementary and Secondary Education Act (ESEA) and US Department of Education authorities) and provisions of its charter agreement.

Meets Standard:

- The school complied with English Language Learner requirements and consistently treated ELL students in a manner consistent with all applicable laws, rules, regulations and provisions of the charter agreement.
 - Identification: The school consistently and effectively implemented steps to identify students in need of ELL services
 - Delivery of Services: Appropriate ELL services were equitably provided to identified students pursuant to the school's policy and educational program
 - Accommodations: Students were provided with appropriate accommodations on assessments
 - Exiting: Students were exited from ELL services in accordance with their capacities.

Does Not Meet Standard:

- The school failed to implement its program in the manner described above.

DATA SOURCES: Indiana Department of Education; signed statement of assurances submitted annually to GSCA; documented complaints submitted to the school, the GSCA or the Indiana Department of Education, as well as any follow-up reports addressing these complaints.

3.5 DUE PROCESS

3.5.a. The school has materially complied with the rights of students.

Meets Standard:

- The school has materially complied with due process protections, civil rights and student liberties requirements. It also respected and deferred to student liberties (including First Amendment protections relating to free speech and religion).

Does Not Meet Standard:

- The school has materially compromised or violated students' civil rights or liberties or has otherwise failed to respect student rights.

DATA SOURCES: Signed statement of assurances submitted annually to GSCA; documented complaints submitted to the school, the GSCA or the Indiana Department of Education, as well as any follow-up reports addressing these complaints.

III. GOVERNANCE

3.6 FIDUCIARY RESPONSIBILITIES

3.6.a. The school has complied with applicable laws, rules, regulations and provisions of its charter agreement relating to governance.

Meets Standard:

- The school materially complied with applicable laws, rules, regulations and provisions of its charter agreement with regard to governance by its board. This includes, but is not limited to compliance with its:
 - By-laws
 - Code of ethics
 - Conflict of interest policy
 - Open Door Law
 - Oversight of Educational Management Organization (if applicable)

Does Not Meet Standard:

- The school failed to comply with applicable laws, rules, regulations and the requirements set forth in the school's charter regarding governance by its board.

DATA SOURCES: Signed statement of assurances submitted annually to GSCA; Accountability Plan Progress Report submitted annual to GSCA; documented complaints submitted to the school, the GSCA or the Indiana Department of Education, as well as any follow-up reports addressing these complaints.

IV. FINANCIAL MANAGEMENT AND OVERSIGHT

3.7 FINANCIAL REPORTING, MANAGEMENT AND COMPLIANCE

3.7.a. The school meets financial reporting and compliance requirements.

Meets Standard:

- The school met the Financial Reporting Requirements:
 - Budget:
 - Was the annual budget submitted on time?
 - Quarterly Financial Reports
 - Were the quarterly financial reports required by the GSCA submitted on time?
 - Audit
 - Did the school receive an unqualified opinion from its independent auditor and was the independent annual audit report devoid of significant findings and conditions, material weaknesses, significant internal control weaknesses, and/or ongoing concerns?
 - Was the annual independent audit submitted on time?
 - Other Reporting Requirements
 - Did the school meet all state and federal financial grant reporting requirements?
 - Did the school meet all reporting requirements for utilization of particular funds?

DATA SOURCES: Indiana Department of Education; annual audited financial statements; quarterly and annual GSCA financial reporting requirements.

Does Not Meet Standard:

- The school scored “No” in the most recent fiscal year in two or more of the categories in the table below.

V. HEALTH, SAFETY & FACILITY

3.8 SAFETY, SECURITY AND HEALTH

3.8.a. The school complies with applicable laws, rules, regulations and provisions of its charter agreement relating to safety, security and health related services.

Meets Standard:

- The school complied with applicable laws, rules, regulations and provisions of its charter agreement relating safety and security and the provision of health related services to students and the school community, including but not limited to:
 - Fire inspections and related records
 - Maintaining a viable certificate of occupancy
 - Maintaining student records and testing materials securely
 - Maintaining documentation of requisite insurance coverage
 - Offering appropriate nursing services
 - Appropriate dispensing of pharmaceuticals
 - Provision of food services

Does Not Meet Standard:

- The school failed to implement its program in the manner described above.

DATA SOURCES: Signed statement of assurances submitted annually to GSCA; documented complaints submitted to the school, the GSCA or the Indiana Department of Education, as well as any follow-up reports addressing these complaints.