

Momentum Strategy & Research

Response to DC PCSB Request for Application Supplement

Re: Application to Become an Approved Accrediting Body for DC Public Charter Schools

1. Prior Accreditation Experience

Momentum has supported AEC schools for more than a decade, though its formal diagnostic review framework — the foundation for this accreditation proposal — has been in place for approximately four years, consistent with its 2022 CDE approval as a Diagnostic Reviewer.

This is distinct from Momentum's approved-provider status: Momentum is a Colorado Department of Education (CDE)-approved Diagnostic Reviewer (approved 2022), specializing in AEC-specific external reviews, and operates BASIC (Balanced Accountability & School Improvement Cycle), approved by CDE in 2023 as an Accountability Pilot Program under Colorado's Local Accountability System grant program. These approvals authorize Momentum to provide diagnostic review, school support, evaluation, and improvement services — the essential elements of an accreditation system, though they do not constitute recognition as a formal accrediting body.

To clarify Colorado's accreditation structure: Colorado's formal, statutory accreditation process does not involve independent third-party accrediting bodies. The State Board of Education accredits school districts annually each fall, based on results from the state's District Performance Framework. Districts are then statutorily responsible (C.R.S. 22-11-307) for accrediting their own schools, based on the state's School Performance Framework results for each school. Districts finalize school and district plan types and sign an accreditation contract with the state by December 31 of each year documenting compliance. This is a state-to-district-to-school accreditation chain, driven entirely by performance-framework data — it does not include a role for external, third-party accreditors like Momentum.

Momentum's work — diagnostic review and BASIC — sits outside this statutory chain. That Momentum is not a recognized accreditor within Colorado's system simply reflects the design of the system itself.

2. Transition from Diagnostic Review to Accreditation

To clarify, it's not only Momentum's diagnostic reviews that create a "foundation for accreditation," but rather Momentum's years of quantitative evaluation, and the entirety of Momentum's BASIC program that when combined provide the foundation.

Momentum has not yet issued a formal accreditation decision using this framework. To date, Momentum's four years of implementation have operated as diagnostic reviews and, more recently, as part of the BASIC (Balanced Accountability & School Improvement Cycle) pilot — not as formal accreditation determinations.

In adapting the framework for formal accreditation, Momentum has not modified the underlying standards. The rubric indicators and performance levels used in diagnostic review are the same as those proposed for accreditation. The one adjustment made was a language change to the proficiency-level headers, made for clarity rather than substance — refining how performance tiers are labeled so schools and reviewers can more easily distinguish between levels. Evidence requirements were already well-established through the diagnostic review process and have not been modified for accreditation purposes. Reviewer procedures — including team composition, on-site protocols, and evidence-gathering practices — likewise remain unchanged from the diagnostic review model.

One methodological change does apply to scoring: accreditation decisions will incorporate a school's quantitative performance data (e.g., SPF-based measures) as a scored component within the overall determination, weighted more heavily than it was in the diagnostic review process, where the qualitative rubric review was the primary driver. Specific scoring thresholds and weighting for this quantitative component are still being finalized, pending review by Momentum's convened team of AEC leaders.

In short: the accreditation framework represents a formalization of an already-proven process rather than the introduction of a substantively new one. Momentum's rationale is that four years of consistent, field-tested

application through diagnostic review provides a stronger foundation for accreditation than a newly-designed framework would.

3. Earning Accreditation

To earn accreditation, a school must demonstrate that it meets substantive and meaningful performance standards, established by a credible and objective third party, through a reliable and transparent process. Concretely, this requires the school to satisfy all three of the following:

- Performance data: The school meets applicable performance targets in at least 2 of 3 areas — its data falls within a reasonable range compared to state and/or national averages, falls within a reasonable range compared to a comparison group of local peer schools, or meets applicable authorizer/state performance targets.
- Qualitative review: The school meets standards under the Accreditation Framework Rubric for Alternative Education Campuses, verified through an externally managed on-site review process.
- Improvement plan targets: The school meets applicable targets established under its school improvement plan, as directed through the qualitative review process.

The rubric itself (Appendix A) scores schools across three domains — Foundational Supports, School Supports and Services, and Effective Leadership and Resources — with each indicator rated Unsatisfactory, Basic, Proficient, or Distinguished. Indicator-level scores roll up into domain totals, which inform the overall accreditation determination alongside the quantitative performance data described above.

Minimum thresholds, mandatory standards, and exceptions: Specific numeric thresholds (e.g., a minimum domain score or indicator floor required for accreditation), any indicators treated as mandatory/non-waivable, and the circumstances under which a school could be accredited despite lower ratings in some areas have not yet been finalized. As noted in the prior response, these determination rules are pending review and finalization by Momentum's convened team of AEC leaders.

4. Relationship Between Accreditation and Other Momentum Services

Momentum's accreditation services are structurally separate from its other AEC-facing work. Aside from policy-level work with the state and direct work with authorizers, Momentum's services fall into two categories:

- Services available to any school anywhere, which are incorporated into the accreditation plan itself (e.g., measure alignment, performance framework support, and the diagnostic-review foundation the accreditation framework builds on).
- Services specific to Colorado's funded improvement program, available only to a handful of Colorado AECs receiving state improvement funding. These services are not part of Momentum's accreditation plan and have no relationship to accreditation — a school does not need to purchase, and cannot purchase, these services as part of becoming or remaining accredited.

In other words, Momentum's AEC services are either fundamentally integrated into accreditation itself (and available to any accreditation candidate on that basis), unavailable to accreditation candidates outside Colorado's funded program, or policy/system-level work that sits upstream from individual schools altogether. There is no category of service in which a school's purchase decision could influence its accreditation outcome.

Momentum has adopted a formal Conflict of Interest Policy that reinforces this separation. Under this policy, follow-up services provided by Momentum to an accredited school are limited to the progress monitoring and reevaluation activities built into the accreditation cycle itself; Momentum does not offer any additional services to

accredited schools, including consulting or technical assistance offered outside that context. Individuals who have personally provided paid consulting or technical assistance to a school within the prior 24 months — through Momentum or any other organization — are barred from serving on that school's accreditation review team for the duration of the accreditation cycle in which the conflict exists.

Momentum has not yet finalized a formal fee schedule distinguishing accreditation fees from other service fees; that remains an open item Momentum will resolve separately from the conflict-of-interest safeguards addressed here.

5. Conflicts of Interest

Momentum ensures the objectivity of accreditation reviews through a formally adopted, written Conflict of Interest Policy governing all accreditation staff, contractors, and reviewers (attached). Under this policy:

- A person who has personally provided other Momentum services (consulting, technical assistance, or improvement support) to a school within the prior 24 months-or who has provided any services to that school through any other organization or in any other capacity within that same timeframe-may not participate in that school's accreditation review team, including scoring, on-site evaluation, or the accreditation determination — for the duration of the accreditation cycle in which the conflict exists.
- All individuals proposed for an accreditation review team must complete a written conflict-of-interest disclosure prior to assignment, reviewed by Momentum's accreditation lead before the team is finalized, with an ongoing obligation to disclose conflicts that arise mid-cycle.
- Conflicts identified at any point after accreditation activities are underway-whether during the initial review, monitoring, or reevaluation-trigger removal of the conflicted individual, an assessment of whether prior findings were compromised, corrective re-review where warranted, and documentation retained in the school's accreditation file.
- Material conflicts identified and resolved in connection with a DC-accredited school will be disclosed to DC PCSB as part of standard accreditation reporting.

Momentum's full Conflict of Interest Policy is provided as an attachment to this response, per DC PCSB's request.

6. Monitoring

Two primary categories of monitoring findings could cause Momentum to revisit or change a school's accreditation status:

- Significant changes in quantitative performance data. Momentum's monitoring process tracks a school's performance data (e.g., SPF-based measures) on an ongoing basis as part of its annual data updates. A substantial decline in this data relative to the baseline established at the time of accreditation — outside the normal range of year-to-year variation — is a trigger for review.
- Failure to implement improvement recommendations over time. Momentum's monitoring process includes structured, recurring check-ins (fidelity tools, implementation tracking, quarterly reflections) tied to the Major Improvement Strategy(s) a school committed to following its accreditation review. A pattern of non-implementation, or failure to make meaningful progress on required improvement targets across multiple check-in cycles, is likewise a trigger for reconsidering accreditation status.

A single weak data point or a temporary implementation delay would not, on its own, trigger a status change — it's the persistence or magnitude of the finding, assessed against the school's own baseline and improvement plan, that matters.

Momentum's Conflict of Interest Policy applies equally to monitoring and reevaluation staff: individuals with a disclosed conflict under that policy are subject to the same recusal requirements during monitoring as during the initial accreditation review.

Communication of findings: It is Momentum's standard process to report monitoring findings to school boards, district leadership, and school accountability committees as applicable. Momentum will extend this same standard

practice to DC PCSB in its role as authorizer — sharing monitoring reports on the same basis provided to other governing and accountability bodies and including DC PCSB in relevant findings meetings and attendance when applicable.

7. Accreditation Term

The length of a school's accreditation term is not fixed at a single default — Momentum's reevaluation cycle typically falls within a three- to five-year window, with the specific term for a given school determined by three factors:

- Timeline of the school's previous accreditation/review cycle. Where a school falls in its prior review history — including whether it was previously reviewed by Momentum or by another accreditor — informs where it enters the new cycle and how long its term runs before reevaluation is due.
- Current performance indicators upon review. A school's standing at the time of its initial accreditation decision — both its quantitative performance data and its rubric-based qualitative findings — factors into the term length. Stronger, more consistent performance supports a longer interval before reevaluation; findings that raise concern support a shorter interval and closer monitoring.
- Authorizer expectations. DC PCSB's own accountability timelines and expectations as the authorizer are factored into the term length Momentum assigns, ensuring the accreditation cycle aligns with — rather than conflicts with — DC PCSB's oversight requirements.

Communication of the decision: The determined term, along with the rationale behind it, will be communicated to the school directly as part of its accreditation decision and reporting. Consistent with Momentum's standard reporting practice described in response to Question 6, this information will also be shared with DC PCSB as authorizer, so DC PCSB has visibility into both the length of the term granted and the basis for that determination at the time the decision is made.

8. Scope of Accreditation in DC

Momentum seeks approval to accredit only those DC public charter schools evaluated under DC PCSB's Alternative Accountability Framework (AAF) — not all DC public charter schools broadly.

This scope reflects Momentum's core expertise and mission: Momentum's standards, rubric, database, and evaluation methodology are purpose-built for Alternative Education Campuses (AECs) and similarly-situated alternative schools serving students at the highest risk of disengagement and dropout. Momentum's Accreditation Framework Rubric, performance database, and improvement model are calibrated to the unique populations, mission variance, and performance patterns of alternative schools — measures and comparison groups that would not be appropriate or valid for evaluating traditional, comprehensive charter schools.

Accordingly, Momentum is applying to serve as an approved accrediting body specifically for the subset of DC public charter schools that fall under DC PCSB's AAF, rather than for DC PCSB's full portfolio of charter schools.

Attachment: Momentum Strategy & Research Accreditation Conflict of Interest Policy

Momentum Strategy & Research

Accreditation Conflict of Interest Policy

1. Purpose

This policy governs how Momentum Strategy & Research ("Momentum") identifies, discloses, and resolves conflicts of interest in connection with its accreditation services, to protect the independence and objectivity of accreditation determinations. This policy applies to all Momentum staff, contractors, and reviewers involved in an accreditation review, decision, monitoring, or reevaluation.

2. Scope

This policy applies specifically to Momentum's accreditation function, as distinct from Momentum's other services. Where a school receiving accreditation services from Momentum also receives, or has received, other Momentum services, this policy governs how that relationship is managed to ensure it does not affect the accreditation determination.

3. Definition of a Conflict of Interest

For purposes of this policy, a conflict of interest exists where a contractor, or reviewer has a personal, financial, or professional relationship with a school under accreditation review that could reasonably be expected to compromise, or appear to compromise, the objectivity of that review. This includes, without limitation:

- Having personally provided paid consulting, technical assistance, or improvement-support services to the school within the prior 24 months;
- Having a current or former employment, board, or governance relationship with the school, its governing board, or its authorizer;
- Having an immediate family member employed by, enrolled at, or serving on the governing board of the school;
- Holding a financial interest in the school or its management organization; or
- Any other relationship that a reasonable person could view as compromising independent judgment.

4. Reviewer Screening and Recusal

Prior to assembling an accreditation review team for a given school, Momentum will screen all prospective team members against the school's service history and known relationships. Any individual with a disclosed or identified conflict under Section 3 will be removed from consideration from that school's accreditation review team, including from scoring, on-site evaluation, and the accreditation determination itself. A recused individual may not serve in any advisory capacity to that review.

5. Disclosure Requirements

All individuals proposed for an accreditation review team must complete a written conflict-of-interest disclosure prior to assignment, identifying any relationship described in Section 3 with the school under review. Disclosures will be reviewed by Momentum's accreditation lead (or designee) prior to finalizing the review team. Team members have an ongoing obligation to disclose any conflict that arises after assignment, including mid-cycle changes such as a new consulting engagement with the school.

6. Separation of Accreditation and Other Services

For schools accredited by Momentum, any follow-up services provided by Momentum will be limited to the progress monitoring and reevaluation activities that are part of the accreditation cycle itself. Momentum will not offer nor provide any additional services to the school outside the accreditation context.

7. Resolution of Identified Conflicts

Where a conflict is identified, Momentum's accreditation lead will:

- Remove the conflicted individual from further participation in the review, scoring, or determination for that school;
- Assess whether the conflicted individual's prior involvement compromised any evidence, scoring, or findings already produced, and take corrective action (including re-review of affected evidence) if warranted; and
- Document the conflict, the date of identification, and the resolution taken, retaining that record as part of the school's accreditation file.

8. Reporting

Momentum will make this policy, and any updates thereto, will be provided to all participating schools, authorizers, or others with regulatory authority over relevant accreditation determinations. Material conflicts identified and resolved under Section 7 in connection with an accredited school will be disclosed as part of standard accreditation reporting.

9. Policy Review

This policy will be reviewed at least annually by Momentum leadership and updated as needed to reflect changes in Momentum's service structure or accreditation practice.

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