

CGMI-C Compliance Mapping NACSA Performance Framework

Methodology

Formal mapping of CGMI criteria to NACSA
Performance Framework standards.

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This document maps CGMI framework criteria to the NACSA Performance Framework standards. Schools and authorizers can use this mapping to understand how CGMI maturity ratings relate to NACSA's authorizer accountability expectations.

1 Purpose of This Document

The National Association of Charter School Authorizers (NACSA) publishes a Performance Framework that serves as the sector's primary standard for charter school accountability. Authorizers use the NACSA framework to structure their oversight and renewal processes. Schools are evaluated against its standards.

This document maps CGMI domains and practice areas to the governance-relevant components of the NACSA Performance Framework. The purpose is twofold:

- **For schools:** Understand how your CGMI maturity rating relates to the standards your authorizer uses. Use your CGMI appraisal evidence to demonstrate compliance with NACSA-aligned governance expectations.
- **For authorizers:** Understand how CGMI ratings map to the framework you already use. Determine how CGMI evidence packages can supplement your existing oversight tools.

This mapping is part of CGMI-C (Compliance Integration). Schools at CGMI Level 2 and above can generate a compliance exhibit that includes this mapping as part of their appraisal output.

2 NACSA Framework Overview

The NACSA Performance Framework organizes charter school accountability into three performance domains. Each domain contains indicators that authorizers use to evaluate school performance.

NACSA Domain	What It Evaluates	Governance Relevance
Academic Performance	Student achievement, growth, and post-secondary readiness. Measured through standardized assessments, graduation rates, and college enrollment data.	Indirect. Board oversight of academic data and response to underperformance are governance activities that influence academic outcomes.
Financial Performance	Fiscal health, sustainability, and compliance. Measured through audits, fund balances, revenue stability, and financial reporting.	Direct. Board financial oversight, audit processes, and fiscal sustainability planning are core governance responsibilities.
Organizational Performance	Governance, compliance, and operational effectiveness. Includes board governance, legal compliance, stakeholder engagement, and charter fidelity.	Most direct. Governance is a primary sub-component of organizational performance. CGMI maps most extensively to this domain.

NACSA's framework is designed to be adapted by each authorizer. It is not prescriptive about specific indicators or thresholds. Instead, it provides a structure that authorizers customize to their context. CGMI provides the detailed, standardized governance measurement that NACSA's framework calls for but does not define.

3 The Compliance vs. Quality Distinction

One of the most important insights from NACSA's framework is the distinction between **Compliance standards** (minimum legal requirements) and **Quality standards** (excellence beyond minimum requirements). This distinction maps directly to CGMI's maturity level structure.

NACSA Standard Type	What It Means	CGMI Equivalent
Compliance Minimum legal requirements	The school meets the minimum legal and regulatory requirements for governance. Board meets as required, notices are posted, minutes are taken, required policies exist, audits are completed.	CGMI Levels 1–2 Level 1 (Emerging) may not consistently meet compliance. Level 2 (Developing) consistently meets compliance standards.
Quality Excellence beyond compliance	The school's governance exceeds minimum requirements. Board processes are proactive, documented, and evidence-based. The board drives strategy, measures its own performance, and continuously improves.	CGMI Levels 3–5 Level 3 (Established) demonstrates quality governance. Levels 4–5 demonstrate advanced and exemplary governance.

This alignment is not coincidental. CGMI's level structure was deliberately designed so that the compliance/quality boundary falls between Level 2 and Level 3. Schools at Level 2 satisfy authorizer compliance expectations. Schools at Level 3+ demonstrate governance quality that goes beyond what authorizers require — governance excellence that schools voluntarily pursue.

4 Mapping Overview

The table below shows how each NACSA performance domain maps to CGMI domains. The NACSA framework's governance indicators are distributed across all three performance domains, with the heaviest concentration in Organizational Performance.

NACSA Domain	Primary CGMI Domains	Supporting CGMI Domains	NACSA Standard Type
Organizational Governance indicators	D1 Board Composition D2 Processes & Compliance D5 Transparency	D3 (Strategic Oversight)	Compliance + Quality
Financial Fiscal oversight	D4 Financial Governance	D2 (Regulatory Compliance)	Compliance + Quality
Academic Board oversight component	D3 Strategic Oversight	D5 (Charter Promise)	Primarily Quality

5 Organizational Performance — Governance Indicators

NACSA's Organizational Performance domain is the primary home of governance indicators. The following table maps each governance-related indicator to CGMI practice areas.

NACSA Governance Indicator	CGMI Practice Areas	Evidence from Appraisal	Standard Type
Board composition and independence	D1.PA1 Board Composition D1.PA4 Diversity & Independence	Board seat count, required positions, independence from management and EMO/CMO, conflict of interest enforcement	Compliance
Board minutes and meeting documentation	D2.PA1 Meeting Management D2.PA2 Records & Documentation	Meeting notice compliance rate, minutes quality and timeliness, quorum achievement, agenda structure	Compliance
Conflict of interest policy and enforcement	D2.PA3 Policy Framework	Conflict of interest policy existence, enforcement documentation, board member disclosure records	Compliance
Bylaw compliance	D2.PA4 Legal & Regulatory Compliance	Charter agreement adherence, bylaw compliance documentation, state statute compliance	Compliance
Oversight of school leadership	D3.PA2 Leadership Oversight	Executive evaluation process, performance metrics, accountability mechanisms, management separation documentation	Quality
Governance transparency and public access	D5.PA1 Public Transparency D5.PA2 Community Engagement	Meeting notice publication, agenda/minutes public availability, parent input mechanisms, community engagement tracking	Compliance + Quality
Board training and competency	D1.PA2 Member Competency D1.PA3 Succession Planning	Training completion rates, certification status, professional development tracking, succession plan documentation	Quality
Authorizer relationship and responsiveness	D5.PA3 Authorizer Relationship	Authorizer communication quality, proactive disclosure, response to authorizer requests, renewal readiness assessment	Quality

6 Financial Performance

NACSA's Financial Performance domain evaluates fiscal health and sustainability. The governance components focus on board financial oversight and audit processes.

NACSA Financial Indicator	CGMI Practice Areas	Evidence from Appraisal	Standard Type
Board financial oversight and budget approval	D4.PA1 Financial Oversight	Budget approval and monitoring process, fund balance management, Treasurer engagement, board financial literacy scores	Compliance
Annual audit and internal controls	D4.PA2 Audit & Internal Controls	Audit completion status and timing, audit committee function, response to findings, internal control policy documentation	Compliance
Financial sustainability planning	D4.PA3 Financial Sustainability	Revenue diversification, reserve fund management, multi-year financial planning, facility cost management strategy	Quality
Fiscal compliance and procurement	D4.PA4 Procurement & Compliance	Procurement policy compliance, conflict of interest in contracting, CMO/EMO financial independence, grant management	Compliance
Financial reporting and transparency	D5.PA1 Public Transparency	Financial document publication, annual report availability, compliance with financial reporting requirements	Compliance

7 Academic Performance — Board Oversight Component

NACSA's Academic Performance domain is primarily measured through student outcomes data. However, the board's role in academic oversight is a governance activity that influences academic performance. CGMI captures this governance dimension.

NACSA Academic Indicator (Governance Component)	CGMI Practice Areas	Evidence from Appraisal	Standard Type
Board oversight of academic performance data	D3.PA3 Academic Accountability	Board review of academic data at meetings, documented response to underperformance, charter mission alignment in board discussion	Quality
Strategic planning tied to academic outcomes	D3.PA1 Strategic Planning	Strategic plan existence and currency, board role in plan development, academic milestones in strategic plan	Quality
Charter promise fidelity — academic commitments	D3.PA4 Charter Promise Fidelity	Monitoring of charter academic commitments, enrollment target compliance, grade expansion tracking, program fidelity	Quality
Executive accountability for academic results	D3.PA2 Leadership Oversight	Executive evaluation tied to academic metrics, performance accountability mechanisms, management separation	Quality

8 How CGMI Levels Map to NACSA Expectations

Each CGMI maturity level corresponds to a specific set of NACSA expectations. The table below shows how a school's CGMI level translates to NACSA-aligned governance quality.

CGMI Level	NACSA Standard Satisfaction	Authorizer Interpretation
L1 Emerging	Below compliance. The school does not consistently meet NACSA compliance standards. Governance indicators would likely be flagged in an authorizer performance review.	Governance risk. Requires active monitoring and likely a corrective action plan.
L2 Developing	Meets compliance standards. The school consistently satisfies NACSA compliance-level governance indicators. Board processes are predictable and documented at minimum level.	Satisfactory. Governance meets authorizer expectations for continued operation.
L3 Established	Meets compliance + emerging quality. The school satisfies all compliance standards and demonstrates quality governance in multiple areas. Proactive, documented, consistent.	Strong. Positive factor in oversight reviews and renewal evaluation.
L4 Advanced	Exceeds compliance + strong quality. The school demonstrates data-driven, benchmarked governance quality across all domains. Year-over-year improvement documented.	Exemplary. Model school for the portfolio. May warrant reduced oversight.
L5 Exemplary	Exceeds all standards. The school's governance is institutional, adaptive, and contributes to sector-wide knowledge. Reference-quality governance for the sector.	Governance exemplar. Authorizer reference school for other boards.

9 Quick Reference Matrix

Complete mapping of all NACSA governance indicators to CGMI practice areas.

NACSA Domain	Indicator	Primary PA	Supporting PAs	Type
Org	Board composition	D1.PA1, D1.PA4	D1.PA2	Compliance
Org	Meeting documentation	D2.PA1, D2.PA2	D2.PA3	Compliance
Org	Conflict of interest	D2.PA3	D2.PA4	Compliance
Org	Bylaw compliance	D2.PA4	D2.PA3	Compliance
Org	Leadership oversight	D3.PA2	D3.PA1	Quality
Org	Transparency	D5.PA1, D5.PA2	D5.PA3	Compl + Qual
Org	Board training	D1.PA2	D1.PA3	Quality
Org	Authorizer relationship	D5.PA3	D5.PA4	Quality
Fin	Financial oversight	D4.PA1	D4.PA2	Compliance
Fin	Audit and controls	D4.PA2	D4.PA1	Compliance
Fin	Sustainability	D4.PA3	D4.PA4	Quality
Fin	Procurement	D4.PA4	D2.PA4	Compliance
Fin	Financial transparency	D5.PA1	D4.PA1	Compliance
Acad	Academic oversight	D3.PA3	D3.PA1	Quality
Acad	Strategic planning	D3.PA1	D3.PA4	Quality
Acad	Charter fidelity	D3.PA4	D3.PA3	Quality
Acad	Executive accountability	D3.PA2	D3.PA1	Quality

CGMI-C · Compliance Integration — NACSA Performance Framework Mapping

Contact: cgmi@chartervision.org · Web: www.cgmi.institute/integration/compliance

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