

**U.S. Department of Education - EDCAPS  
G5-Technical Review Form (New)**

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## Technical Review Coversheet

Applicant: Arizona Department of Education (U282A150009)

Reader #1: \*\*\*\*\*

	Points Possible	Points Scored
<b>Questions</b>		
<b>Selection Criteria</b>		
<b>State-Level Strategy</b>		
1. State-Level Strategy	15	13
<b>Sub Total</b>	<b>15</b>	<b>13</b>
<b>Selection Criteria</b>		
<b>Policy Context for Charter Schools</b>		
1. Policy Context	5	5
<b>Sub Total</b>	<b>5</b>	<b>5</b>
<b>Selection Criteria</b>		
<b>Past Performance</b>		
1. Past Performance	10	8
<b>Quality of Plan to Support Ed. Dis. Students</b>		
1. Ed. Dis. Students	15	15
<b>Vision for Growth and Accountability</b>		
1. Growth and Accountability	10	9
<b>Dissemination of Information and Best Practices</b>		
1. Dissemination	10	10
<b>Oversight of Public Chartering Agencies</b>		
1. Oversight of Authorizers	15	14
<b>Management Plan and Theory of Action</b>		
1. Management Plan	10	7
<b>Project Design</b>		
1. Project Design	10	10
<b>Sub Total</b>	<b>80</b>	<b>73</b>
<b>Priority Questions</b>		
<b>Competitive Preference Priority</b>		
<b>High-Quality Authorizing and Monitoring Processes</b>		
1. CPP 1	15	15
<b>Sub Total</b>	<b>15</b>	<b>15</b>
<b>Competitive Preference Priority</b>		
<b>Authorizer other than LEA or Appeal Process</b>		

1. CPP 2

	5	5
<b>Sub Total</b>	5	5
<b>Total</b>	120	111

# Technical Review Form

Panel #12 - SEA Panel - 12: 84.282A

Reader #1: \*\*\*\*\*

Applicant: Arizona Department of Education (U282A150009)

## Questions

### Selection Criteria - State-Level Strategy

1. The Secretary considers the quality of the State-level strategy for using charter schools to improve educational outcomes for students throughout the State. In determining the quality of the State-level strategy, the Secretary considers the following factors:

1) The extent to which the SEA 's CSP activities, including the subgrant program, are integrated into the State s overall strategy for improving student academic achievement and attainment (including high school graduation rates and college and other postsecondary education enrollment rates) and closing achievement and attainment gaps, and complement or leverage other statewide education reform efforts;

2) The extent to which funding equity for charter schools (including equitable funding for charter school facilities) is incorporated into the SEA' s State-level strategy; and

3) The extent to which the State encourages local strategies for improving student academic achievement and attainment that involve charter schools, including but not limited to the following:

i. Collaboration, including the sharing of data and promising instructional and other practices, between charter schools and other public schools or providers of early learning and development programs or alternative education programs; and

ii. The creation of charter schools that would serve as viable options for students who currently attend, or would otherwise attend, the State 's lowest-performing schools.

### Strengths:

The applicant provides a clear description of how the sub-grant program will align with the state's current reform efforts specifically in high needs areas and building capacity for all local districts.

Since 1994, charter schools have been a part of the state's significant strategy to provide educational opportunities for all Arizona students to access quality education opportunities that may not have been available otherwise, page 16.

The Arizona Legislature created a state authorizing Agency independent of school districts and other public bodies and is an example of the state level strategy that has been successful. Though 99.9% of charters come through this organization, the Charter law also allows for school districts, state universities and community colleges to authorize charter schools, page 16.

Arizona public school charters receive the same Base Support Level (BSL) funding as public district schools as prescribed by law, page 19. A major strength the applicant describes is the additional .5 per pupil in funding weight to ensure charters have an equal opportunity to start out strong. The legislature also created a system to anticipate advance charter funding at the beginning of the school year called Estimate Student Count and described on page 19.

Funding equity is included in the Charter School Law and therefore is clearly incorporated into the SEA's State-level strategy and a major strength that contributes to a strong start for new charters.

Another strength is that the Legislature created charter Additional Assistance funding that is not available to public districts because charters cannot go directly to the taxpayers to support their organizations. The statute is included on

pages 19 and 20.

A combination of the two types of support is referred to as the Charter Equalization Assistance designed to offset the school's lack of access to direct taxpayer funding, page 20.

Collaboration is thoroughly described on several levels and will provide opportunities for sharing data and promising instructional practices between charter schools and other public schools. Some of the activities that are described and unique are the sponsored conferences and initiatives described on page 21 and 22.

The applicant proposes to open, replicate or reform schools that fuel student success, particularly in the Phoenix urban core through the Aspiring Leaders Fellowship recruitment initiative described on page 23.

Improving student outcomes and closing the achievement gaps are two areas to be addressed within the charter school community and align with the state strategy.

The applicant cites a wealth of data on the impact of charter schools in improving student academic performance over a five year period, experiencing great success on pages 17, 18.

**Weaknesses:**

The applicant does not provide sufficient detail on high school graduation rates, which is critical in response to the state's reform initiatives.

The applicant did not address funding for facilities, a major consideration for most startup charters.

**Reader's Score: 13**

**Selection Criteria - Policy Context for Charter Schools**

**1. The Secretary considers the policy context for charter schools under the proposed project. In determining the policy context for charter schools under the proposed project, the Secretary considers the following factors:**

**1) The degree of flexibility afforded to charter schools under the State's charter school law, including:**

**i. The extent to which charter schools in the State are exempt from State or local rules that inhibit the flexible operation and management of public schools; and**

**ii. The extent to which charter schools in the State have a high degree of autonomy, including autonomy over the charter school's budget, expenditures, staffing, procurement, and curriculum;**

**2) The quality of the SEA's processes for:**

**i. Annually informing each charter school in the State about Federal funds the charter school is eligible to receive and Federal programs in which the charter school may participate; and**

**ii. Annually ensuring that each charter school in the State receives, in a timely fashion, the school's commensurate share of Federal funds that are allocated by formula each year, particularly during the first year of operation of the school and during a year in which the school's enrollment expands significantly; and**

**3) The quality of the SEA's plan to ensure that charter schools that are considered to be LEAs under State law and LEAs in which charter schools are located will comply with sections 613(a)(5) and 613(e)(1)(B) of IDEA (20 U.S.C. 1400, et seq.), the Age Discrimination Act of 1975 (42 U.S.C. 6101, et seq.), title**

**VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d, et seq.), title IX of the Education Amendments of 1972 (20 U.S.C. 1681, et seq.), and section 504 of the Rehabilitation Act of 1973 (29 U.S.C. 794).**

**Strengths:**

The charter schools have a great degree of flexibility which is provided in Arizona state law. The applicant has received excellent national rankings for the strength of its charter school laws from organization such as the Center for Education Reform, a Washington, D.C. based education reform advocacy group, page 23. Further strengthening this section is the Arizona Revised Statute referred to on page 24 that provides more autonomy and flexibility over budgets and expenditures as well as daily operations, personnel, and curriculum.

Access to federal funds and programming is clearly addressed and included in the Arizona state statues referred to on page 25.

Multiple activities are undertaken to ensure each Charter School is informed on an annual basis about State and federal funds that charters are eligible to receive, along with program in which they can participate. Examples of the activities provided include notifying charter schools of opportunities through methods such as online resources, web-based and email alerts, print materials, public announcements, face to face workshops, presentations and meetings. This variety of contact options ensures that charter schools have access to information in a timely fashion and have the same opportunities to take advantage of resources that are made available, page 25.

The applicant clearly describes the Charter school and LEA assurances regarding State law and federal law. The Arizona Attorney General Opinion No. 104-006 (Appendix E) ensures compliance with state and federal law, page 26.

New charters are required to attend a mandatory Special Education training which is a strength because of the stringent requirements and litigious nature of the law, page 27.

**Weaknesses:**

No weakness were noted.

**Reader's Score: 5**

**Selection Criteria - Past Performance**

**1. The Secretary considers the past performance of charter schools in a State that enacted a charter school law for the first time five or more years before submission of its application. In determining the past performance of charter schools in such a State, the Secretary considers the following factors:**

**1) The extent to which there has been a demonstrated increase, for each of the past five years, in the number and percentage of high-quality charter schools (as defined in this notice) in the State;**

**2) The extent to which there has been a demonstrated reduction, for each of the past five years, in the number and percentage of academically poor-performing charter schools (as defined in this notice) in the State; and**

**3) Whether, and the extent to which, the academic achievement and academic attainment (including high school graduation rates and college and other postsecondary education enrollment rates) of charter school students equal or exceed the academic achievement and academic attainment of similar students in other public schools in the State over the past five years.**

**Strengths:**

Evidence is provided that there has been an increase in the number and percentage of high-quality charter schools in the state based on the new accountability system, A-F Letter Grades which has a specific ranking system described on page 28. A detailed chart is also provided on page 27 which indicates the Quality and percentages of schools fall in high quality

or poor performing over a 5 year period. This data provides a discerning picture of the progression of high quality schools over this period.

The number and percentage of academically poor-performing charters are minimal compared to high performing charters based on the data provided in Table 1 on page 27. The applicant indicates that for the past three years, Arizona charter schools have demonstrated consistency in increasing high quality charter schools and decreasing the percentage of poor performing schools.

The data from Table 2 on page 29 provides evidence the students in charters across demographics show academic achievement and attainment equal or exceeding academic achievement and attainment of students in other district schools.

Graduation lags behind based on data in Table on page 30 which is complicated with the fact that most of the alternative schools in Arizona are Charter Schools high schools and when graduation rates are disaggregated by charter versus non-charter there is a higher than normal impact on charter school graduation rates.

**Weaknesses:**

Though an explanation is provided regarding the high school graduation lag behind traditional public schools, there is no policy recommendation for how to better address the graduation lag through data collection, disaggregation, and analysis.

**Reader's Score: 8**

**Selection Criteria - Quality of Plan to Support Ed. Dis. Students**

**1. The Secretary considers the quality of the SEA 's plan to support educationally disadvantaged students. In determining the quality of the plan to support educationally disadvantaged students, the Secretary considers the following factors:**

**1) The extent to which the SEA' s charter school subgrant program would--**

**i. Assist students, particularly educationally disadvantaged students, in meeting and exceeding State academic content standards and State student achievement standards; and**

**ii. Reduce or eliminate achievement gaps for educationally disadvantaged students;**

**2) The quality of the SEA 's plan to ensure that charter schools attract, recruit, admit, enroll, serve, and retain educationally disadvantaged students equitably, meaningfully, and, with regard to educationally disadvantaged students who are students with disabilities or English learners, in a manner consistent with, as appropriate, the IDEA (regarding students with disabilities) and civil rights laws, in particular, section 504 of the Rehabilitation Act of 1973, as amended, and title VI of the Civil Rights Act of 1964;**

**3) The extent to which the SEA will encourage innovations in charter schools, such as models, policies, supports, or structures, that are designed to improve the academic achievement of educationally disadvantaged students; and**

**4) The quality of the SEA 's plan for monitoring all charter schools to ensure compliance with Federal and State laws, particularly laws related to educational equity, nondiscrimination, and access to public schools for educationally disadvantaged students.**

**Strengths:**

The SEA describes a commitment to assist educationally disadvantaged students by providing competitive preference points to those school serving a high percentage of disadvantaged students. Applicants will have to demonstrate their ability to recruit in their sub-grants applications as described on page 30.

Another major strength of the application is the focus on assembling a highly effective board that will advocate for educationally disadvantaged students with the central focus on reducing and eliminating achievement gaps, page 31.

The strength of the SEA's plan to ensure that charter schools attract, recruit, admit, enroll, serve, and retain educationally disadvantaged students will be addressed through the priority points for new applications, but also by creating committed leadership and effective academic programs, page 32.

Program innovation will be encouraged and many charter schools have demonstrated success in integrating innovative models to educate disadvantaged students and this is reflected by their academic performance provided on page 35. Several examples are cited as evidence of the types of innovation effective for students who are educationally disadvantaged and students with disabilities.

Several examples are cited on page 36 of successful charters integrating effective and innovative models. The strength is in the performance data and the alignment based on proven practices in sub-grant-applications.

Monitoring to ensure compliance with Federal and State laws is done on a five year cycles and more frequently in some instances.

The legal language and mandates are in place and the applicant intends to work closely with charter sponsors who report monitoring results and address non-compliance issues as indicated on page 36.

A major strength is the requirement that new charter operators must attend a mandatory Special Education training conducted by ADE before signing of the Charter Contract and prior to the opening of school under the contract.

**Weaknesses:**

No weaknesses were noted.

**Reader's Score: 15**

**Selection Criteria - Vision for Growth and Accountability**

**1. The Secretary determines the quality of the statewide vision, including the role of the SEA, for charter school growth and accountability. In determining the quality of the statewide vision, the Secretary considers the following factors:**

**1) The quality of the SEA' s systems for collecting, analyzing, and publicly reporting data on charter school performance, including data on student academic achievement, attainment (including high school graduation rates and college and other postsecondary education enrollment rates), retention, and discipline for all students and disaggregated by student subgroup;**

**2) The ambitiousness, quality of vision, and feasibility of the SEA' s plan (including key actions) to support the creation of high-quality charter schools during the project period, including a reasonable estimate of the number of high-quality charter schools in the State at both the beginning and the end of the project period; and**

**3) The ambitiousness, quality of vision, and feasibility of the SEA' s plan (including key actions) to support the closure of academically poor-performing charter schools in the State (i.e., through revocation, non-renewal, or voluntary termination of a charter) during the project period.**

**Note: In the context of closing academically poor-performing charter schools, we remind applicants of**

**the importance of ensuring adherence to applicable laws, policies, and procedures that govern the closure of a charter school, the disposition of its assets, and the transfer of its students and student records.**

**Strengths:**

The SEA's systems for collecting, analyzing, and publicly reporting data on charter school performance is extensive and covers data across various dimensions related to student academic performance. Two agencies work together to collect, analyze and report data on charter school performance. This is a strength because the two agencies can share accountability. Information on page 37 further indicates how the two agencies complement each other and work together to develop a dashboard that is posted on ASBCS Online for public sharing.

The applicant will focus on concrete, measurable achievement of previous charter school sub-grantees who have been successful, due in part to the Aspiring Leaders Fellowship and New Schools for Phoenix initiatives. The applicant intends to create a pipeline of these leaders and build capacity with veterans to replicate their schools, which is a major strength in this section on page 37.

The applicant clearly outlines short-term outcomes and long-term impact that includes the development of 30 high quality charter schools to open and serve educationally disadvantaged students and implement validated strategies and programs, page 38.

The SEA has an ambitious plan to support closure of academically poor performing charter schools and this plan is a part of the Arizona State Board for Charter Schools requirements.

The Board requires that the wait period should not be the end of the five year contract but to begin an Academic Intervention Schedule if the charter school does not meet the Board academic expectation over a period of two full years. This requirement is a major strength of the application and is further explained on page 38. The reason it is a major strength is that students are not subjected to five years in a low performing school.

**Weaknesses:**

The applicant alludes to closing achievement gaps but it is not sufficiently addressed in the description of the SEA's system of collecting data.

**Reader's Score: 9**

**Selection Criteria - Dissemination of Information and Best Practices**

**1. The Secretary considers the quality of the SEA's plan to disseminate information about charter schools and best or promising practices of successful charter schools to each LEA in the State as well as to charter schools, other public schools, and charter school developers (20 U.S.C. 7221b(b)(2)(C) and 7221(c)(f)(6)). If an SEA proposes to use a portion of its grant funds for dissemination subgrants under section 5204(f)(6)(B) of the ESEA (20 U.S.C. 7221c(f)(6)(B)), the SEA should incorporate these subgrants into the overall plan for dissemination. In determining the quality of the SEA's plan to disseminate information about charter schools and best or promising practices of successful charter schools, the Secretary considers the following factors:**

**1) The extent to which the SEA will serve as a leader in the State for identifying and disseminating information and research (which may include, but is not limited to, providing technical assistance) about best or promising practices in successful charter schools, including how the SEA will use measures of efficacy and data in identifying such practices and assessing the impact of its dissemination activities;**

**2) The quality of the SEA's plan for disseminating information and research on best or promising practices used by, and the benefits of, charter schools that effectively incorporate student body diversity, including racial and ethnic diversity and diversity with respect to educationally disadvantaged**

students, consistent with applicable law;

3) The quality of the SEA's plan for disseminating information and research on best or promising practices in charter schools related to student discipline and school climate; and

4) For an SEA that proposes to use a portion of its grant funds to award dissemination subgrants under section 5204(f)(6)(B) of the ESEA (20 U.S.C. 7221a(f)(6)(B)), the quality of the subgrant award process and the likelihood that such dissemination activities will increase the number of high-quality charter schools in the State and contribute to improved student academic achievement.

**Strengths:**

The applicant clearly delineates how the SEA will serve as a leader in the State for identifying and disseminating best practices. The applicant will approach dissemination through both a national and state level focus with descriptions on pages 39 and 40. Dissemination of the set of evidenced-based qualitative leading indicators to predict the success of charter schools is a good example of the type of information to be disseminated.

Annual summer summits, ADE's Leading Change Conference and other key opportunities for sharing information are strengths of the dissemination efforts and will likely be effective in reaching charter school personnel and other stakeholders.

The applicant addresses school climate through the National School Climate's Center per "The 12 Dimensions of School Climate Measured", page 41.

The SEA's plan for disseminating information and research on best or promising practices, including those for educationally disadvantaged students is specific and targeted to encourage applicants to open high quality charter schools targeting racially and ethnically diverse students, page 41.

Findings across target areas will also be disseminated through web-sites of AZ CSP, summits, conferences, professional learning facilitations, and technical assistance, page 41.

The ADE has chosen not to use a portion of its grant funds to award dissemination sub-grants, page 42.

**Weaknesses:**

No weaknesses are noted.

**Reader's Score: 10**

**Selection Criteria - Oversight of Public Chartering Agencies**

The Secretary considers the quality of the SEA's plan (including any use of grant administrative or other funds) to monitor, evaluate, assist, and hold accountable authorized public chartering agencies. In determining the quality of the SEA's plan to provide oversight to authorized public chartering agencies, the Secretary considers how well the SEA's plan will ensure that authorized public chartering agencies are --

1) Seeking and approving charter school petitions from developers that have the capacity to create charter schools that can become high-quality charter schools;

2) Approving charter school petitions with design elements that incorporate evidence-based school models and practices, including, but not limited to, school models and practices that focus on racial and ethnic diversity in student bodies and diversity in student bodies with respect to educationally disadvantaged students, consistent with applicable law;

3) Establishing measurable academic and operational performance expectations for all charter schools

(including alternative charter schools, virtual charter schools, and charter schools that include pre-kindergarten, if such schools exist in the State) that are consistent with the definition of high-quality charter school as defined in this notice;

4) Monitoring their charter schools on at least an annual basis, including conducting an in-depth review of each charter school at least once every five years, to ensure that charter schools are meeting the terms of their charter or performance contracts and complying with applicable State and Federal laws;

5) Using increases in student academic achievement as one of the most important factors in renewal decisions; basing renewal decisions on a comprehensive set of criteria, which are set forth in the charter or performance contract; and revoking, not renewing, or encouraging the voluntary termination of charters held by academically poor-performing charter schools;

6) Providing, on an annual basis, public reports on the performance of their portfolios of charter schools, including the performance of each individual charter school with respect to meeting the terms of, and expectations set forth in, the school's charter or performance contract;

7) Supporting charter school autonomy while holding charter schools accountable for results and meeting the terms of their charters or performance contracts; and

8) Ensuring the continued accountability of charter schools during any transition to new State assessments or accountability systems, including those based on college- and career-ready standards.

**Strengths:**

The applicant describes how they will seek and approve charter school petitions from developers that have the capacity to create charter schools that are high quality schools which includes full use of the Arizona Code provided on page 43. The strength here is that the law is specific and includes language that encourages high quality charter schools.

Replication applications are also a strength, page 44, because they are based on past success with academically disadvantaged students.

Approving charter petitions with design elements addressed will be a part of the replication application mentioned on page 44.

For a new charter, the design elements must be addressed as a key piece of the application and must thread throughout the educational program, instructional approach, and model, along with practices proven to be effective with the identified population which is a critical because it is evidence based.

Establishing measurable academic and operational performance expectations is addressed on page 44 as part of the ASBCS performance adopted framework in 2012. Page 44.

Monitoring charters schools on at least an annual basis, with an in-depth review every five years is addressed on page 45 as part of the ASBCS requirements and state law.

Using increases in student academic achievement as one of the most important factors in renewal decision and revoking or encouraging voluntary termination of charters held by academically poor-performing charter schools is addressed on page 45 as part of the ASBCS requirements and Arizona law. This is a critical component of the law because of the overall impact closure of a charter school has on students and families.

Providing annual public reports on the performance of each individual charter school regarding the school's charter or performance contract is described in Absolute Priority 1 and is part of the ASBCS standards and state law.

Supporting charter school autonomy while holding them accountable for results is addressed on page 45 and indicates that ASBCS waives requirements for charter holders that meet the requirements of the Board's performance expectations. A strength is the elimination of paperwork if expectations are being met and could also be perceived as another incentive to meet high quality standards.

Ensuring continued accountability of charter schools during transition to more robust learning standards and accountability

system is addressed on page 46 as part of the ASBCS standards and state law as an outcome of the Arizona State Board of Education action on May, 18, 2015 and described on page 46.

**Weaknesses:**

The applicant does not address how they will seek developers who have the capacity to create charter schools that can become high-quality while providing no priority points or other incentives.

**Reader's Score: 14**

**Selection Criteria - Management Plan and Theory of Action**

1. The Secretary considers the quality of the management plan and the project 's theory of action. In determining the quality of the management plan and the project s theory of action, the Secretary considers the following factors:

1) The quality, including the cohesiveness and strength of reasoning, of the logic model (as defined in 34 CFR 77.1(c)) and the extent to which it addresses the role of the grant in promoting the State-level strategy for using charter schools to improve educational outcomes for students through CSP subgrants for planning, program design, and initial implementation; optional dissemination subgrants; optional revolving loan funds; and other strategies;

2) The extent to which the SEA' s project-specific performance measures, including any measures required by the Department, support the logic model; and

3) The adequacy of the management plan to --

i. Achieve the objectives of the proposed project on time and within budget, including the existence of clearly defined responsibilities, timelines, and milestones for accomplishing project tasks; and

ii. Address any compliance issues or findings related to the CSP that are identified in an audit or other monitoring review.

**Note:** The Secretary encourages the applicant to propose a comprehensive management plan and theory of action for assessing the achievement of the objectives, including developing performance measures and performance targets for its proposed grant project that are consistent with those objectives. The applicant should clearly identify the project-specific performance measures and performance targets in its plan and should review the logic model application requirement and performance measures section of this notice for information on the requirements for developing those performance measures and performance targets consistent with the objectives of the proposed project. The applicant may choose to include a discussion of the project-specific performance measures and targets it develops in response to the logic model requirement when addressing this criterion.

**Strengths:**

The logic model table on page 46 is well developed and includes cohesiveness and strength of reasoning evidenced by the inclusion of resources, strategies/activities, outputs, short term and long term outcomes and expected impact. The logic model is aligned with the State-level strategy for using charter schools to improve educational outcomes for academically disadvantaged students.

The SEA's project-specific performance measures support the logic model and are aligned with activities and strategies, along with expected outcomes.

The management plan is adequate to achieve objectives of the proposed project on time and within budget based on the information provided in the tables on pages 48 and 49.

Each activity is clearly delineated with the responsible party, timeline, milestone and budget necessary to support the activity. Adding the Budget column to the management plan provides an opportunity to ensure adequate funding has been allotted for successful implementation of specific activities and is also provides some fiscal oversight.

**Weaknesses:**

The logic model does not include how outcomes will be measured. This would strengthen the logic model and provide more confidence in the outcomes and impacts.

Though the management plan indicates the responsible party, it is unclear how the project will be staffed and the percentage of time essential staff will be assigned to carry out the tasks delineated in the management plan to support being on time and on budget with project activities.

**Reader's Score:** 7

**Selection Criteria - Project Design**

**1. The Secretary considers the quality of the design of the SEA 's charter school subgrant program, including the extent to which the project design furthers the SEA' s overall strategy for increasing the number of high-quality charter schools in the State and improving student academic achievement. In determining the quality of the project design, the Secretary considers the following factors:**

**1) The quality of the SEA' s process for awarding subgrants for planning, program design, and initial implementation and, if applicable, for dissemination, including:**

**i. The subgrant application and peer review process, timelines for these processes, and how the SEA intends to ensure that subgrants will be awarded to eligible applicants demonstrating the capacity to create high-quality charter schools; and**

**ii. A reasonable year-by-year estimate, with supporting evidence, of**

**a) the number of subgrants the SEA expects to award during the project period and the average size of those subgrants, including an explanation of any assumptions upon which the estimates are based; and**

**b) if the SEA has previously received a CSP grant, the percentage of eligible applicants that were awarded subgrants and how this percentage related to the overall quality of the applicant pool;**

**2) The process for monitoring CSP subgrantees;**

**3) How the SEA will create a portfolio of subgrantees that focuses on areas of need within the State, such as increasing student body diversity or maintaining a high level of student body diversity, and how this focus aligns with the State-Level Strategy;**

**4) The steps the SEA will take to inform teachers, parents, and communities of the SEA' s charter school subgrant program; and**

**5) A description of any requested waivers of statutory or regulatory provisions over which the Secretary exercises administrative authority and the extent to which those waivers will, if granted, further the objectives of the project.**

**Strengths:**

The quality of the subgrants for planning, program design, and initial implementation is clearly described and includes the application and peer review process, timelines, and verification of eligibility. Sub-grants will average \$250,000 per year for a three year period subject to renewal, page 54.

A year-by-year estimate is provided with an explanation clearly provided for each year in the table on page 55.

The applicant indicates that 60% of eligible applicants received a sub-grant since the first awards were made in 2010. Data is provided and disaggregated based on ratings on page 56.

The process for monitoring CSP subgrantees is addressed on page 56 and includes training and knowledge of what to expect regarding the monitoring process.

One major strength of the comprehensive monitoring process is the monitoring in the planning period year which supports getting off to a strong start. Additionally a minimum of three onsite monitoring visits during implementation provides further support. This process is well described on page 56 of the application.

The monitoring handbook is an excellent resource because it is readily accessible and there is clarity in seeing requirements in writing in addition to other methods of communication and sharing of information.

A variety of data will be used to create a portfolio of sub-grantees that focus on areas of need within the State, including achievement gaps and special focus on students with disabilities and ELL students. Page 57.

Communication steps to be used to inform all stakeholders is described and provided on page 57 and includes use of online resources, alerts, social media, print resources, public announcements, regional face to face public information meetings among others. Using a variety of communication outlets will ensure that marginalized groups will have access to information. This is crucial because of the need to make sure all stakeholders have a level of awareness and responsibility to be informed.

**Weaknesses:**

No weaknesses were noted.

**Reader's Score: 10**

**Priority Questions**

**Competitive Preference Priority - High-Quality Authorizing and Monitoring Processes**

**Competitive Preference Priority 1: High-Quality Authorizing and Monitoring Processes**

To meet this priority, an applicant must demonstrate that all authorized public chartering agencies in the State use one or more of the following:

a) Frameworks and processes to evaluate the performance of charter schools on a regular basis that include--

1) Rigorous academic and operational performance expectations (including performance expectations related to financial management and equitable treatment of all students and applicants);

2) Performance objectives for each school aligned to those expectations;

3) Clear criteria for renewing the charter of a school based on an objective body of evidence, including evidence that the charter school has (a) met the performance objectives outlined in the charter or performance contract; (b) demonstrated organizational and fiscal viability; and (c) demonstrated fidelity to the terms of the charter or performance contract and applicable law;

4) Clear criteria for revoking the charter of a school if there is violation of law or public trust regarding student safety or public funds, or evidence of poor student academic achievement; and

**5) Annual reporting by authorized public chartering agencies to each of their authorized charter schools that summarizes the individual school 's performance and compliance, based on this framework, and identifies any areas that need improvement.**

**b) Clear and specific standards and formalized processes that measure and benchmark the performance of the authorized public chartering agency or agencies, including the performance of its portfolio of charter schools, and provide for the annual dissemination of information on such performance;**

**c) Authorizing processes that establish clear criteria for evaluating charter applications and include a multi-tiered clearance or review of a charter school, including a final review immediately before the school opens for its first operational year; or**

**d) Authorizing processes that include differentiated review of charter petitions to assess whether, and the extent to which, the charter school developer has been successful (as determined by the authorized public chartering agency) in establishing and operating one or more high-quality charter schools.**

**Strengths:**

The frameworks and processes to evaluate the performance of charter schools on a regular basis include rigorous academic and operation performance expectations based on ASBCS and Arizona state law and requirements for all charter schools, Page 11.

Performance objectives are aligned to performance expectations and evidenced by on-site visits, annual financial audits, and submission of performance data as part of the charter renewal process. The Academic Performance Framework and Guidance document used to demonstrate how charter schools can meet the Boards academic performance expectation is provided on page 11.

Clear criteria for renewing the charter is delineated and specifically relate to the performance objectives, organizational and fiscal viability, and fidelity to the terms of the charter as reflected by the Arizona law and cited in the narrative on page 12. Significant progress toward the academic performance expectations set forth in the sponsor's performance framework is one of the most important factors provided on page 12.

Clear criteria for renewing and revoking the charter is described and enforced. The determination is based on whether the charter school fails to meet or make reasonable progress toward achievement of the content or pupil performance standards identified in the charter contract. Arizona has statutory and regulatory authority to remove an authorizer's power to authorize charter schools if appropriate oversight or mismanagement has been determined. The Academic Intervention Policy Statement is described on page 12 as identifying clear criteria for revoking a charter based upon poor academic performance.

Annual reporting is required as with any public school in the state. Arizona law and statues require frequent performance reports, annual financial audits and other data for the annual academic "dashboards", that represent charter school performance based upon the academic performance framework's indicators and measures, page 13.

Clear and specific standards and formalized process that measure and benchmark the performance of public charter schools are described and include the performance and annual dissemination of information on performance through the dashboards which are posted on the Board's website. Arizona law also provides for formalized processes for reviewing the performance of an authorizer's portfolio on charter school and provides for dissemination of information, page 13.

The application includes a clear description of the authorizing process with clear criteria for evaluating the application, page 14.

There is a differentiated review of charter petitions to assess the extent to which the developer has been successfully establishing and operating one or more high quality charter schools. The review process is required by state statues and offers two options described on page 15. The first is for new charter applications and the second is for experienced applicants that have existing charters that have consistently demonstrated high quality academic and operational performance, page 15.

**Weaknesses:**

No weaknesses were noted.

**Reader's Score:** 15

**Competitive Preference Priority - Authorizer other than LEA or Appeal Process**

**1. Competitive Preference Priority 2: One Authorized Public Chartering Agency Other than a LEA, or an Appeals Process**

To meet this priority, the applicant must demonstrate that the State--

a) Provides for one authorized public chartering agency that is not an LEA, such as a State chartering board, for each individual or entity seeking to operate a charter school pursuant to State law; or

b) In the case of a State in which LEAs are the only authorized public chartering agencies, allows for an appeals process for the denial of an application for a charter school.

**Note:** In order to meet this priority under paragraph (b) above, the entity hearing appeal must have the authority to approve the charter application over the objections of the LEA.

**Strengths:**

Arizona law clearly provides for multiple charter authorizers that are not an LEA and it is supported by the state statute provided on page 15. Further there is a model request for proposals for authorizers seeking a charter school, renewal criteria, and a performance/accountability plan to evaluate charter school performance.

Arizona law has no cap on the number of charter schools that can be authorized, page 16.

**Weaknesses:**

No weaknesses were noted.

**Reader's Score:** 5

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**Status:** Submitted

**Last Updated:** 08/03/2015 11:39 AM

Status: Submitted

Last Updated: 08/03/2015 11:39 AM

## Technical Review Coversheet

Applicant: Arizona Department of Education (U282A150009)

Reader #2: \*\*\*\*\*

	Points Possible	Points Scored
<b>Questions</b>		
<b>Selection Criteria</b>		
<b>State-Level Strategy</b>		
1. State-Level Strategy	15	13
<b>Sub Total</b>	<b>15</b>	<b>13</b>
<b>Selection Criteria</b>		
<b>Policy Context for Charter Schools</b>		
1. Policy Context	5	4
<b>Sub Total</b>	<b>5</b>	<b>4</b>
<b>Selection Criteria</b>		
<b>Past Performance</b>		
1. Past Performance	10	8
<b>Quality of Plan to Support Ed. Dis. Students</b>		
1. Ed. Dis. Students	15	14
<b>Vision for Growth and Accountability</b>		
1. Growth and Accountability	10	8
<b>Dissemination of Information and Best Practices</b>		
1. Dissemination	10	10
<b>Oversight of Public Chartering Agencies</b>		
1. Oversight of Authorizers	15	14
<b>Management Plan and Theory of Action</b>		
1. Management Plan	10	7
<b>Project Design</b>		
1. Project Design	10	9
<b>Sub Total</b>	<b>80</b>	<b>70</b>
<b>Priority Questions</b>		
<b>Competitive Preference Priority</b>		
<b>High-Quality Authorizing and Monitoring Processes</b>		
1. CPP 1	15	14
<b>Sub Total</b>	<b>15</b>	<b>14</b>
<b>Competitive Preference Priority</b>		
<b>Authorizer other than LEA or Appeal Process</b>		

1. CPP 2

	5	5
<b>Sub Total</b>	5	5
<b>Total</b>	120	106

# Technical Review Form

Panel #12 - SEA Panel - 12: 84.282A

Reader #2: \*\*\*\*\*

Applicant: Arizona Department of Education (U282A150009)

## Questions

### Selection Criteria - State-Level Strategy

1. The Secretary considers the quality of the State-level strategy for using charter schools to improve educational outcomes for students throughout the State. In determining the quality of the State-level strategy, the Secretary considers the following factors:

1) The extent to which the SEA 's CSP activities, including the subgrant program, are integrated into the State s overall strategy for improving student academic achievement and attainment (including high school graduation rates and college and other postsecondary education enrollment rates) and closing achievement and attainment gaps, and complement or leverage other statewide education reform efforts;

2) The extent to which funding equity for charter schools (including equitable funding for charter school facilities) is incorporated into the SEA' s State-level strategy; and

3) The extent to which the State encourages local strategies for improving student academic achievement and attainment that involve charter schools, including but not limited to the following:

i. Collaboration, including the sharing of data and promising instructional and other practices, between charter schools and other public schools or providers of early learning and development programs or alternative education programs; and

ii. The creation of charter schools that would serve as viable options for students who currently attend, or would otherwise attend, the State 's lowest-performing schools.

### Strengths:

The application provides strong evidence of integration between Arizona's charter schools and the ADE. The application provides information demonstrating that the Arizona State Board for Charter Schools (ASBCS), a separate state-established agency "independent of school districts and other public bodies," was designed to integrate charter schools' into the state's overall education strategy of providing educational opportunities for all students (e31). In 2009, the ADE created the Arizona Charter School Program to integrate charter schools into the state's plan to "increase the number of high quality charter schools, especially in low income areas with...low student achievement, low graduation rates, and diverse student bodies" (e32). To further the effort, the AZ applied for and received a CSP SEA grant, passing through the funds to 81 subgrants over the past five years. As a result of the subgrant, 48 charter schools now serve low income/low achievement communities in both rural and urban settings, further demonstrating integration with the ADE goals and charter school programs (e32).

The application demonstrates that funding equity does exist for charter schools in Arizona. All schools in the state of Arizona receive the same foundation amount -known as Base Support Level funding-as other public schools in the state (e34). The application shows that additional dollars based on enrollment create additional funding for small school systems, favoring many charter schools that, in Arizona, are deemed a separate LEA (e34). To compensate for the charter's inability to individually seek tax increases, the state evened the field by providing Additional Assistance funding available only to charter schools (e34). Finally, to assist the smaller LEA charter schools maintain cash-flow, the legislature also created the Estimated Student Count so charter schools could be advanced funds prior to the state's official student count (e34).

The application provides evidence that the State promotes collaboration between charter schools and other public

schools. One example highlighted in the application was a framework for evaluating teachers and principals across the state. As part of a legislative requirement, the Arizona Department of Education (ADE) developed a model framework with teachers. Charter and other public school staff worked cooperatively to implement the new framework (e36). Other examples cited in the application include joint attendance by charter and district staff at workshops coordinated by the ADE to learn about the implementation of College and Career Readiness standards (e36).

The proposal highlights several examples of newly-created charter schools as viable options for students attending low income schools. Several leadership development programs are listed that provide preparation for future charter school leaders who then “open schools serving diverse student populations in low income areas.” (e37) Since 2012, the CSP has doubled its awards to leaders who will open schools in underserved areas. The AZ CSP offered subgrants to newly created charter schools, all of which “opened schools in concentrated, low income areas of urban Phoenix” (e37).

#### **Weaknesses:**

The application clearly shows that funding equity exists between charter and traditional schools in Arizona. While the state provides opportunities for additional funding, however, there is no provision for providing funds for facilities. (e35). The application demonstrated that much coordination exists between the state and its largest authorizer. It does not, however, clearly articulate how the ADE and the ACBCS interact on a day to day basis, especially in terms of integrating the activities of charter and traditional schools. It is difficult to tell if the organizations cooperate or if they are just being responsive to legislative mandates.

**Reader's Score: 13**

#### **Selection Criteria - Policy Context for Charter Schools**

**1. The Secretary considers the policy context for charter schools under the proposed project. In determining the policy context for charter schools under the proposed project, the Secretary considers the following factors:**

**1) The degree of flexibility afforded to charter schools under the State's charter school law, including:**

**i. The extent to which charter schools in the State are exempt from State or local rules that inhibit the flexible operation and management of public schools; and**

**ii. The extent to which charter schools in the State have a high degree of autonomy, including autonomy over the charter school's budget, expenditures, staffing, procurement, and curriculum;**

**2) The quality of the SEA's processes for:**

**i. Annually informing each charter school in the State about Federal funds the charter school is eligible to receive and Federal programs in which the charter school may participate; and**

**ii. Annually ensuring that each charter school in the State receives, in a timely fashion, the school's commensurate share of Federal funds that are allocated by formula each year, particularly during the first year of operation of the school and during a year in which the school's enrollment expands significantly; and**

**3) The quality of the SEA's plan to ensure that charter schools that are considered to be LEAs under State law and LEAs in which charter schools are located will comply with sections 613(a)(5) and 613(e)(1)(B) of IDEA (20 U.S.C. 1400, et seq.), the Age Discrimination Act of 1975 (42 U.S.C. 6101, et seq.), title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d, et seq.), title IX of the Education Amendments of 1972 (20 U.S.C. 1681, et seq.), and section 504 of the Rehabilitation Act of 1973 (29 U.S.C. 794).**

**Strengths:**

The proposal provides strong evidence that charter schools enjoy a high degree of autonomy in Arizona. The applicant demonstrates that State laws permit charter schools to have full control of governance requirements, daily operations, curricular and instructional decisions (e39). Arizona's charter schools also have flexibility over their calendar, and personnel policies and qualifications (e40).

The proposal demonstrates that the ADE systematically and regularly provides information about federal funds to charter schools through a variety of outreach methods, including an alerts (web-based and email), print, public announcements, workshops, presentations, and meetings (e40). Technical assistance from the state is available to assist charter operators in planning and applying for funds using the state's system (e40).

**Weaknesses:**

The proposal provides little evidence that charter schools comply with the all listed federal laws. Special Education oversight is limited. While the application points out that charter schools are provided technical assistance, it appears to only cover those areas of the law related to compliance. (e41). The applicant also does not discuss how other federal laws are monitored.

**Reader's Score: 4**

**Selection Criteria - Past Performance**

- 1. The Secretary considers the past performance of charter schools in a State that enacted a charter school law for the first time five or more years before submission of its application. In determining the past performance of charter schools in such a State, the Secretary considers the following factors:**
  - 1) The extent to which there has been a demonstrated increase, for each of the past five years, in the number and percentage of high-quality charter schools (as defined in this notice) in the State;**
  - 2) The extent to which there has been a demonstrated reduction, for each of the past five years, in the number and percentage of academically poor-performing charter schools (as defined in this notice) in the State; and**
  - 3) Whether, and the extent to which, the academic achievement and academic attainment (including high school graduation rates and college and other postsecondary education enrollment rates) of charter school students equal or exceed the academic achievement and academic attainment of similar students in other public schools in the State over the past five years.**

**Strengths:**

The applicant describes the outcomes of their previous CSP grant. During the last five year award, 81 subgrants were awarded, including 48 who are located in low income areas with diverse populations (e32). During that period, large increases in the number of high quality schools occurred over the last five years, tripling the percentage of schools with that distinction (e42).

While data related to the reduction of low performing charter schools remained largely unchanged, the proposal does highlight the use of revocation as a means of reducing low performing charter schools (e43). Closures of low performing charter schools exceeded 100 schools during the previous grant period (e44).

The applicant provides data that demonstrate charter school students consistently outperforming their traditional school counterparts in elementary and middle grades. In particular, the proposal shows that 4th and 8th grade achievement eclipsed that of traditional school students (e45).

**Weaknesses:**

Despite closing many low performing schools, the percentage of low quality charter schools has not changed much over 5 years, moving from 7% to 10% after reaching a high of nearly 20% two years ago (e42).

Data provided in the application indicate that for the last five years, charter school cohort graduation rates were 20% lower than their traditional school counterparts.

The proposal uses only one measure of academic achievement-assessment scores-and one measure of attainment-graduation rate. The notice suggests that multiple data points should be provided for achievement and attainment measures (e45).

**Reader's Score: 8**

**Selection Criteria - Quality of Plan to Support Ed. Dis. Students**

**1. The Secretary considers the quality of the SEA 's plan to support educationally disadvantaged students. In determining the quality of the plan to support educationally disadvantaged students, the Secretary considers the following factors:**

**1) The extent to which the SEA' s charter school subgrant program would--**

**i. Assist students, particularly educationally disadvantaged students, in meeting and exceeding State academic content standards and State student achievement standards; and**

**ii. Reduce or eliminate achievement gaps for educationally disadvantaged students;**

**2) The quality of the SEA 's plan to ensure that charter schools attract, recruit, admit, enroll, serve, and retain educationally disadvantaged students equitably, meaningfully, and, with regard to educationally disadvantaged students who are students with disabilities or English learners, in a manner consistent with, as appropriate, the IDEA (regarding students with disabilities) and civil rights laws, in particular, section 504 of the Rehabilitation Act of 1973, as amended, and title VI of the Civil Rights Act of 1964;**

**3) The extent to which the SEA will encourage innovations in charter schools, such as models, policies, supports, or structures, that are designed to improve the academic achievement of educationally disadvantaged students; and**

**4) The quality of the SEA 's plan for monitoring all charter schools to ensure compliance with Federal and State laws, particularly laws related to educational equity, nondiscrimination, and access to public schools for educationally disadvantaged students.**

**Strengths:**

The SEA describes using the subgrant application process to prioritize those that seek to provide a high quality charter school serving disadvantaged students. The SEA application requires extensive description of academic programming, including descriptions of research based practices that are effective in closing achievement gaps (e47). The subgrant application asks applicants to provide specific data demonstrating success in raising achievement outcomes for as well as experience with, students from high poverty areas (e45).

The CSP subgrant application provides preferences for charters attracting a higher percentage of students from low income communities; the subgrant application must provide a recruitment plan that targets students with disadvantages (e50). Applicants must present a formalized process to establish policies and procedures to admit and enroll disadvantaged students, design challenging academic programs and foster a safe and healthy school climate, and other strategies that would retain disadvantaged students.

The application demonstrates the use of innovative an alternative practices used by previous subgrant winners (e51). The

proposal points to several examples including schools for students with autism, STEM schools, and Montessori schools (e51).

The proposal demonstrates that the applicant has multiple application pathways, including one for replication. The abbreviated process is used by schools demonstrating at least 3 years of high academic performance and evidence of practices proven to be effective when working with students from low poverty environments (e59).

The proposal describes a monitoring process to ensure that charter schools are in compliance with federal and State laws. Arizona charter schools are monitored for compliance by the ADE ESS Unit. This unit works closely with authorizers and reports monitoring results and addresses non-compliance issues (e51).

#### **Weaknesses:**

The applicant lists activities of recruitment, enrollment, etc., but does not provide specific strategies. The applicant does not specifically identify any specific enrollment and retention goals or the amount by which students are expected to gain in achievement (e51).

Although there are good examples of innovative programs, the proposal could be strengthened by describing the methods by which the SEA will encourage innovation or how by what method they will identify promising practices in the application process (e51).

**Reader's Score: 14**

#### **Selection Criteria - Vision for Growth and Accountability**

**1. The Secretary determines the quality of the statewide vision, including the role of the SEA, for charter school growth and accountability. In determining the quality of the statewide vision, the Secretary considers the following factors:**

**1) The quality of the SEA' s systems for collecting, analyzing, and publicly reporting data on charter school performance, including data on student academic achievement, attainment (including high school graduation rates and college and other postsecondary education enrollment rates), retention, and discipline for all students and disaggregated by student subgroup;**

**2) The ambitiousness, quality of vision, and feasibility of the SEA' s plan (including key actions) to support the creation of high-quality charter schools during the project period, including a reasonable estimate of the number of high-quality charter schools in the State at both the beginning and the end of the project period; and**

**3) The ambitiousness, quality of vision, and feasibility of the SEA' s plan (including key actions) to support the closure of academically poor-performing charter schools in the State (i.e., through revocation, non-renewal, or voluntary termination of a charter) during the project period.**

**Note: In the context of closing academically poor-performing charter schools, we remind applicants of the importance of ensuring adherence to applicable laws, policies, and procedures that govern the closure of a charter school, the disposition of its assets, and the transfer of its students and student records.**

#### **Strengths:**

The proposal illustrates how the ADE and ACBCS work together to collect analyze and report data. The two organizations share a research unit and share data. Using the ASBCS Performance Framework, the groups work together to calculate performance on academic progress. The state provides data to the charter board who in turn distributes it to the charter

schools (e52).

The SEA plans to achieve an ambitious outcome by the end of the grant. In the proposal, ADE plans to increase by 30 the number of high quality charters (e52).

The application describes several key actions (e.g., Academic Intervention Schedule) to reduce the number of low performing charter schools (e53). As stated earlier, the state has reduced the number of low performing charters by over 100 in the last five years.

Another strategy enumerated in the proposal is the development of a pipeline of future charter leaders. Working with partners, the SEA describes programming to increase the number of high quality school leaders to service in disadvantaged communities. (e52).

**Weaknesses:**

The applicant fails to identify any other data beyond achievement, and then only using standardized test data to demonstrate academic success or failure. In addition, the data does not include non-academic data, such as discipline (e52).

The application largely relies on technology to inform families, teachers and communities. In addition, the proposal does not offer many strategies beyond those using technology (e.g., email, text, social media) which could be difficult to access for families in communities where many members live in poverty (i.e., the target communities for the subgrant) (e57).

**Reader's Score:** 8

**Selection Criteria - Dissemination of Information and Best Practices**

**1. The Secretary considers the quality of the SEA's plan to disseminate information about charter schools and best or promising practices of successful charter schools to each LEA in the State as well as to charter schools, other public schools, and charter school developers (20 U.S.C. 7221b(b)(2)(C) and 7221(c)(f)(6)). If an SEA proposes to use a portion of its grant funds for dissemination subgrants under section 5204(f)(6)(B) of the ESEA (20 U.S.C. 7221c(f)(6)(B)), the SEA should incorporate these subgrants into the overall plan for dissemination. In determining the quality of the SEA's plan to disseminate information about charter schools and best or promising practices of successful charter schools, the Secretary considers the following factors:**

**1) The extent to which the SEA will serve as a leader in the State for identifying and disseminating information and research (which may include, but is not limited to, providing technical assistance) about best or promising practices in successful charter schools, including how the SEA will use measures of efficacy and data in identifying such practices and assessing the impact of its dissemination activities;**

**2) The quality of the SEA's plan for disseminating information and research on best or promising practices used by, and the benefits of, charter schools that effectively incorporate student body diversity, including racial and ethnic diversity and diversity with respect to educationally disadvantaged students, consistent with applicable law;**

**3) The quality of the SEA's plan for disseminating information and research on best or promising practices in charter schools related to student discipline and school climate; and**

**4) For an SEA that proposes to use a portion of its grant funds to award dissemination subgrants under section 5204(f)(6)(B) of the ESEA (20 U.S.C. 7221a(f)(6)(B)), the quality of the subgrant award process**

**and the likelihood that such dissemination activities will increase the number of high-quality charter schools in the State and contribute to improved student academic achievement.**

**Strengths:**

The application gives a wide ranging view of dissemination activities. It describes two levels of dissemination, including a national and a local strategy:

At the national level, the Arizona CSP developed a series of evidence-based quantitative leading indicators to predict charter school success;

Through its Monitoring Handbook, the SEA has received much data to help identify best practices and they have presented monitoring activities gleaned from the CSP program. Applicants, who are required to incorporate student body diversity into charter school models and practices, presents specific strategies to support disadvantaged students (e56).

The CSP has led the Arizona Instructional Rounds (AIR).

**Weaknesses:**

There are no weaknesses in this section

**Reader's Score: 10**

**Selection Criteria - Oversight of Public Chartering Agencies**

**1. The Secretary considers the quality of the SEA 's plan (including any use of grant administrative or other funds) to monitor, evaluate, assist, and hold accountable authorized public chartering agencies. In determining the quality of the SEA' s plan to provide oversight to authorized public chartering agencies, the Secretary considers how well the SEA' s plan will ensure that authorized public chartering agencies are --**

**1) Seeking and approving charter school petitions from developers that have the capacity to create charter schools that can become high-quality charter schools;**

**2) Approving charter school petitions with design elements that incorporate evidence-based school models and practices, including, but not limited to, school models and practices that focus on racial and ethnic diversity in student bodies and diversity in student bodies with respect to educationally disadvantaged students, consistent with applicable law;**

**3) Establishing measureable academic and operational performance expectations for all charter schools (including alternative charter schools, virtual charter schools, and charter schools that include pre-kindergarten, if such schools exist in the State) that are consistent with the definition of high-quality charter school as defined in this notice;**

**4) Monitoring their charter schools on at least an annual basis, including conducting an in-depth review of each charter school at least once every five years, to ensure that charter schools are meeting the terms of their charter or performance contracts and complying with applicable State and Federal laws;**

**5) Using increases in student academic achievement as one of the most important factors in renewal decisions; basing renewal decisions on a comprehensive set of criteria, which are set forth in the charter or performance contract; and revoking, not renewing, or encouraging the voluntary termination of charters held by academically poor-performing charter schools;**

**6) Providing, on an annual basis, public reports on the performance of their portfolios of charter schools, including the performance of each individual charter school with respect to meeting the terms of, and expectations set forth in, the school 's charter or performance contract;**

**7) Supporting charter school autonomy while holding charter schools accountable for results and meeting the terms of their charters or performance contracts; and**

**8) Ensuring the continued accountability of charter schools during any transition to new State**

**assessments or accountability systems, including those based on college- and career-ready standards.**

**Strengths:**

The applicant describes a rigorous application process as well as approval guidelines used to ensure authorizers approve the highest quality operators (e58). Included in this process are requirements to identify a target population and to design programming, especially academic programming, around that population (e59).

The application describes the mechanisms by which the state authorizer is monitored by the legislature (e57). The authorizer must report on the academic and operation performance of their portfolio. The state annually reports on charter school outcomes, including information from the performance framework (e60).

The applicant demonstrates that the ASBCS employs high quality mechanisms to ensure high quality charters. To ensure high quality, the Charter Board provides measurable performance expectations through its performance framework which specifies measures for expected performance (e59).

The applicant offers a schedule for evaluation which includes annual evaluations and in depth evaluations every five years (e60). The renewal process described by the applicant states that academic performance is one of the most important indicators (e60) of a program's performance.

**Weaknesses:**

The proposal lists various requirements from the state for approving charter schools. While this may be sufficient to approve charter schools, it is not sufficient to recruit new applicants nor does it explain how these high-capacity developers will be found (e58).

The application does not clearly demonstrate how school autonomy will be supported other than to waive certain review and renewal requirements.

**Reader's Score: 14**

**Selection Criteria - Management Plan and Theory of Action**

**1. The Secretary considers the quality of the management plan and the project's theory of action. In determining the quality of the management plan and the project's theory of action, the Secretary considers the following factors:**

**1) The quality, including the cohesiveness and strength of reasoning, of the logic model (as defined in 34 CFR 77.1(c)) and the extent to which it addresses the role of the grant in promoting the State-level strategy for using charter schools to improve educational outcomes for students through CSP subgrants for planning, program design, and initial implementation; optional dissemination subgrants; optional revolving loan funds; and other strategies;**

**2) The extent to which the SEA's project-specific performance measures, including any measures required by the Department, support the logic model; and**

**3) The adequacy of the management plan to --**

**i. Achieve the objectives of the proposed project on time and within budget, including the existence of clearly defined responsibilities, timelines, and milestones for accomplishing project tasks; and**

**ii. Address any compliance issues or findings related to the CSP that are identified in an audit or other monitoring review.**

**Note: The Secretary encourages the applicant to propose a comprehensive management plan and theory of action for assessing the achievement of the objectives, including developing performance measures**

and performance targets for its proposed grant project that are consistent with those objectives. The applicant should clearly identify the project-specific performance measures and performance targets in its plan and should review the logic model application requirement and performance measures section of this notice for information on the requirements for developing those performance measures and performance targets consistent with the objectives of the proposed project. The applicant may choose to include a discussion of the project-specific performance measures and targets it develops in response to the logic model requirement when addressing this criterion.

**Strengths:**

The logic model provided by the applicant clearly aligns with the proposed activities. In addition, the management plans align with the theory (e61). In addition, the performance measures support the logic model (e61). The applicant provides a timeline that aligns with both the logic model and the planned activities (e61). To address compliance issues, the applicant has received monitoring and audits from both West ED and the ED Office of the Inspector General. The results of each were incorporated into the new AZ CSP Monitoring Procedures (e69).

**Weaknesses:**

The performance targets for decreasing the achievement gap (ensuring students gain a year of academic growth) will be insufficient for closing the achievement gap since that will not accelerate their growth, only stabilize the gap and keep students from falling further behind. Assuming that students in higher performing subsets meet the standards of their grade each year, lower performing groups will have to exceed one year's growth to make any impact on the gap. The performance measures are somewhat broad and nonspecific.

The application does not differentiate the different types of students who may comprise the target group. Although all these students experience educational disadvantages, there is little discussion about students how the strategies may differ based on whether poverty, disability, or being an English language learner.

**Reader's Score:** 7

**Selection Criteria - Project Design**

**1. The Secretary considers the quality of the design of the SEA 's charter school subgrant program, including the extent to which the project design furthers the SEA' s overall strategy for increasing the number of high-quality charter schools in the State and improving student academic achievement. In determining the quality of the project design, the Secretary considers the following factors:**

**1) The quality of the SEA' s process for awarding subgrants for planning, program design, and initial implementation and, if applicable, for dissemination, including:**

**i. The subgrant application and peer review process, timelines for these processes, and how the SEA intends to ensure that subgrants will be awarded to eligible applicants demonstrating the capacity to create high-quality charter schools; and**

**ii. A reasonable year-by-year estimate, with supporting evidence, of**

**a) the number of subgrants the SEA expects to award during the project period and the average size of those subgrants, including an explanation of any assumptions upon which the estimates are based; and**

**b) if the SEA has previously received a CSP grant, the percentage of eligible applicants that were awarded subgrants and how this percentage related to the overall quality of the applicant pool;**

**2) The process for monitoring CSP subgrantees;**

**3) How the SEA will create a portfolio of subgrantees that focuses on areas of need within the State, such as increasing student body diversity or maintaining a high level of student body diversity, and how**

**this focus aligns with the State-Level Strategy;**

**4) The steps the SEA will take to inform teachers, parents, and communities of the SEA's charter school subgrant program; and**

**5) A description of any requested waivers of statutory or regulatory provisions over which the Secretary exercises administrative authority and the extent to which those waivers will, if granted, further the objectives of the project.**

**Strengths:**

The application provides states that 10 charter schools per year (30 by the end of the grant) will be offered subgrants to create high quality charter schools (e70). The proposal describes a competitive application process to identify quality applicants (e69).

The application states that 60% of eligible applicants have received a subgrant since the first awards were made available (e70).

The application describes in detail its process for monitoring subgrantees, including an emphasis on onsite monitoring (e72).

The applicant does not request any waivers (e73).

**Weaknesses:**

The plan for informing teachers, parents, and communities of the SEA's charter school subgrant program is vague and does not offer specific targets (e71). The applicant could strengthen this response by offering goals that identify the may be used to refine the communication and information process.

**Reader's Score: 9**

**Priority Questions**

**Competitive Preference Priority - High-Quality Authorizing and Monitoring Processes**

**1. Competitive Preference Priority 1: High-Quality Authorizing and Monitoring Processes**

**To meet this priority, an applicant must demonstrate that all authorized public chartering agencies in the State use one or more of the following:**

**a) Frameworks and processes to evaluate the performance of charter schools on a regular basis that include--**

**1) Rigorous academic and operational performance expectations (including performance expectations related to financial management and equitable treatment of all students and applicants);**

**2) Performance objectives for each school aligned to those expectations;**

**3) Clear criteria for renewing the charter of a school based on an objective body of evidence, including evidence that the charter school has (a) met the performance objectives outlined in the charter or performance contract; (b) demonstrated organizational and fiscal viability; and (c) demonstrated fidelity to the terms of the charter or performance contract and applicable law;**

**4) Clear criteria for revoking the charter of a school if there is violation of law or public trust regarding student safety or public funds, or evidence of poor student academic achievement; and**

**5) Annual reporting by authorized public chartering agencies to each of their authorized charter schools that summarizes the individual school's performance and compliance, based on this framework, and identifies any areas that need improvement.**

**b) Clear and specific standards and formalized processes that measure and benchmark the performance**

of the authorized public chartering agency or agencies, including the performance of its portfolio of charter schools, and provide for the annual dissemination of information on such performance;

c) Authorizing processes that establish clear criteria for evaluating charter applications and include a multi-tiered clearance or review of a charter school, including a final review immediately before the school opens for its first operational year; or

d) Authorizing processes that include differentiated review of charter petitions to assess whether, and the extent to which, the charter school developer has been successful (as determined by the authorized public chartering agency) in establishing and operating one or more high-quality charter schools.

**Strengths:**

Arizona law requires evaluations every five years, using up to four years of data (e18). ASBCS, Arizona's primary authorizer, requires an annual evaluation using a performance framework that requires sufficient progress towards academic performance expectations as well reviewing other elements such as financial management, operational performance, compliance, and fidelity to the charter agreement (e27). Charter operators meet the frameworks expectations only when all of the operator's school meet or exceed standards (e23). The authorizer's framework identifies performance expectations in multiple areas, including academics (one of the most important factors, according to the application) with specific measures and metrics used to mark progress towards target outcomes (e27). The application describes dissemination activities that inform the public of the about performance (e28). Charter applicants are put through a multi-tiered process that includes an administrative review, a technical review with feedback, and a third review after the applicant makes changes based on the feedback. The process also includes an interview (e28). The state offers two application processes: one for wholly new operators and one for operators who have previously opened a successful charter school (e30). The performance framework includes guidance describing to charter operators how the framework is used during the renewal process (e27). The proposal describes a series of graduating interventions that precede revocation, including for failure to meet academic standards (e27).

**Weaknesses:**

The application does not state whether all authorizers ask their charter schools to go through a similarly rigorous process.

**Reader's Score:** 14

**Competitive Preference Priority - Authorizer other than LEA or Appeal Process**

**1. Competitive Preference Priority 2:One Authorized Public Chartering Agency Other than a LEA, or an Appeals Process**

To meet this priority, the applicant must demonstrate that the State--

a) Provides for one authorized public chartering agency that is not an LEA, such as a State chartering board, for each individual or entity seeking to operate a charter school pursuant to State law; or

b) In the case of a State in which LEAs are the only authorized public chartering agencies, allows for an appeals process for the denial of an application for a charter school.

**Note:** In order to meet this priority under paragraph (b) above, the entity hearing appeal must have the authority to approve the charter application over the objections of the LEA.

**Strengths:**

Arizona law allows for multiple authorizers. One of the authorizers, the Arizona State Board for Charter Schools (ASBCS), is a state agency that partners with the Arizona Department of Education and authorizes nearly all the charter schools in the state (e17). Currently, there are 8 authorizers although the ASBCS authorizes 515 out of 561 Arizona

charter schools.

**Weaknesses:**

There were no weakness noted in this priority.

**Reader's Score:** 5

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**Status:** Submitted

**Last Updated:** 08/03/2015 11:39 AM

Status: Submitted

Last Updated: 08/03/2015 11:39 AM

## Technical Review Coversheet

Applicant: Arizona Department of Education (U282A150009)

Reader #3: \*\*\*\*\*

	Points Possible	Points Scored
<b>Questions</b>		
<b>Selection Criteria</b>		
<b>State-Level Strategy</b>		
1. State-Level Strategy	15	13
<b>Sub Total</b>	<b>15</b>	<b>13</b>
<b>Selection Criteria</b>		
<b>Policy Context for Charter Schools</b>		
1. Policy Context	5	5
<b>Sub Total</b>	<b>5</b>	<b>5</b>
<b>Selection Criteria</b>		
<b>Past Performance</b>		
1. Past Performance	10	8
<b>Quality of Plan to Support Ed. Dis. Students</b>		
1. Ed. Dis. Students	15	15
<b>Vision for Growth and Accountability</b>		
1. Growth and Accountability	10	9
<b>Dissemination of Information and Best Practices</b>		
1. Dissemination	10	10
<b>Oversight of Public Chartering Agencies</b>		
1. Oversight of Authorizers	15	14
<b>Management Plan and Theory of Action</b>		
1. Management Plan	10	8
<b>Project Design</b>		
1. Project Design	10	10
<b>Sub Total</b>	<b>80</b>	<b>74</b>
<b>Priority Questions</b>		
<b>Competitive Preference Priority</b>		
<b>High-Quality Authorizing and Monitoring Processes</b>		
1. CPP 1	15	15
<b>Sub Total</b>	<b>15</b>	<b>15</b>
<b>Competitive Preference Priority</b>		
<b>Authorizer other than LEA or Appeal Process</b>		

1. CPP 2

	5	5
<b>Sub Total</b>	5	5
<b>Total</b>	120	112

# Technical Review Form

Panel #12 - SEA Panel - 12: 84.282A

Reader #3: \*\*\*\*\*

Applicant: Arizona Department of Education (U282A150009)

## Questions

### Selection Criteria - State-Level Strategy

1. The Secretary considers the quality of the State-level strategy for using charter schools to improve educational outcomes for students throughout the State. In determining the quality of the State-level strategy, the Secretary considers the following factors:

1) The extent to which the SEA 's CSP activities, including the subgrant program, are integrated into the State s overall strategy for improving student academic achievement and attainment (including high school graduation rates and college and other postsecondary education enrollment rates) and closing achievement and attainment gaps, and complement or leverage other statewide education reform efforts;

2) The extent to which funding equity for charter schools (including equitable funding for charter school facilities) is incorporated into the SEA' s State-level strategy; and

3) The extent to which the State encourages local strategies for improving student academic achievement and attainment that involve charter schools, including but not limited to the following:

i. Collaboration, including the sharing of data and promising instructional and other practices, between charter schools and other public schools or providers of early learning and development programs or alternative education programs; and

ii. The creation of charter schools that would serve as viable options for students who currently attend, or would otherwise attend, the State 's lowest-performing schools.

### Strengths:

The applicant describes strong integration in state strategy since the establishment of charter schools in 1994 (p. 16). Charters make up 26% of all schools in state (p. 17) and the state created the Arizona Charter Schools Program (AZ CSP) within the Arizona Department of Education (ADE) to increase the number of high quality schools serving low-income students and those with a history of low achievement (p. 17). The applicant offers data on prior CSP subgrant results, including strong school results and describes continuous improvement in charter performance (p. 18). Arizona provides identical Base Support Level funding (p. 19) and Charter Equalization Assistance (p. 20) to make up for the fact that "charter schools [do] not have the ability to go directly to Arizona taxpayers to support their organizations" (p.19). ADE describes a plan for schools to collaborate, integrated with AZ Framework for Measuring Educator Effectiveness (p. 20) and the annual summits hosted as part of that effort. ADE also describes a strong plan for recruiting leaders in the Aspiring Leaders Program, an effort of the Arizona Charter Schools Association, and the New Schools for Phoenix leadership cohorts to apply for subgrants and open schools for educationally disadvantaged students per subgrants (p. 22-23)

### Weaknesses:

The state did not provide adequate data on the performance of charter schools in comparison to traditional public schools within the state. ADE also failed to provide any information about whether the state provides charter schools with facilities funding.

Reader's Score: 13

### Selection Criteria - Policy Context for Charter Schools

1. The Secretary considers the policy context for charter schools under the proposed project. In determining the policy context for charter schools under the proposed project, the Secretary considers the following factors:

1) The degree of flexibility afforded to charter schools under the State's charter school law, including:

i. The extent to which charter schools in the State are exempt from State or local rules that inhibit the flexible operation and management of public schools; and

ii. The extent to which charter schools in the State have a high degree of autonomy, including autonomy over the charter school's budget, expenditures, staffing, procurement, and curriculum;

2) The quality of the SEA's processes for:

i. Annually informing each charter school in the State about Federal funds the charter school is eligible to receive and Federal programs in which the charter school may participate; and

ii. Annually ensuring that each charter school in the State receives, in a timely fashion, the school's commensurate share of Federal funds that are allocated by formula each year, particularly during the first year of operation of the school and during a year in which the school's enrollment expands significantly; and

3) The quality of the SEA's plan to ensure that charter schools that are considered to be LEAs under State law and LEAs in which charter schools are located will comply with sections 613(a)(5) and 613(e)(1)(B) of IDEA (20 U.S.C. 1400, et seq.), the Age Discrimination Act of 1975 (42 U.S.C. 6101, et seq.), title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d, et seq.), title IX of the Education Amendments of 1972 (20 U.S.C. 1681, et seq.), and section 504 of the Rehabilitation Act of 1973 (29 U.S.C. 794).

#### Strengths:

Arizona notes that it has a highly rated state law according to an expert national organization (p. 23), including a revised statute that gives charters full control over their budgets and expenditures (p. 24). Charter schools in the state have flexibility over curriculum and instruction, the school calendar and staffing. The state provides clear communication on available funding (p. 25) through a variety of information channels. ADE provides annual training and TA to all charter schools on how to use the online Grants Management System to apply for funds and other online systems that manage student count and demographic data used to determine funding amounts. Arizona also describes several publications it has developed to offer charter schools clarity on Special Education and Title I requirements, responsibilities, and funding opportunities. All Arizona charter schools are their own LEAs and charter contracts clearly state the requirement that, as such, charters must comply with all applicable federal and state laws pertaining to LEAs. Arizona's plan notes that these requirements are built into the ABCS charter contracts the terms of which are used to monitor schools for compliance. (p. 27).

#### Weaknesses:

None noted

Reader's Score: 5

### Selection Criteria - Past Performance

1. The Secretary considers the past performance of charter schools in a State that enacted a charter school law for the first time five or more years before submission of its application. In determining the past

performance of charter schools in such a State, the Secretary considers the following factors:

- 1) The extent to which there has been a demonstrated increase, for each of the past five years, in the number and percentage of high-quality charter schools (as defined in this notice) in the State;
- 2) The extent to which there has been a demonstrated reduction, for each of the past five years, in the number and percentage of academically poor-performing charter schools (as defined in this notice) in the State; and
- 3) Whether, and the extent to which, the academic achievement and academic attainment (including high school graduation rates and college and other postsecondary education enrollment rates) of charter school students equal or exceed the academic achievement and academic attainment of similar students in other public schools in the State over the past five years.

**Strengths:**

The state provides a clear data table to demonstrate the increase in the number and quantity of high-quality charter schools over the past 5 years (p. 27). The table also shows a reduction in poor performing schools and the state describes the efforts of ASBCS to revoke "charter school contracts consistent with its commitment to school accountability and high quality (p.28).

**Weaknesses:**

While the state talks about closing schools for poor performance, the application also indicates that some schools have "voluntarily surrendered contracts" because they could not meet academic performance standards (p.28). This seems to be a weakness, as it does not speak to the capacity of the state to authorize high-quality schools or to support their approved schools once they open.

The applicant notes, "the graduation rates for charter schools as compared to districts schools lag behind" (p. 30) and explains that the higher number of alternative charter high schools accounts for this disparity. However, there is no clear plan from the state to address this disparity.

**Reader's Score: 8**

**Selection Criteria - Quality of Plan to Support Ed. Dis. Students**

1. The Secretary considers the quality of the SEA 's plan to support educationally disadvantaged students. In determining the quality of the plan to support educationally disadvantaged students, the Secretary considers the following factors:

- 1) The extent to which the SEA' s charter school subgrant program would--

- i. Assist students, particularly educationally disadvantaged students, in meeting and exceeding State academic content standards and State student achievement standards; and

- ii. Reduce or eliminate achievement gaps for educationally disadvantaged students;

- 2) The quality of the SEA 's plan to ensure that charter schools attract, recruit, admit, enroll, serve, and retain educationally disadvantaged students equitably, meaningfully, and, with regard to educationally disadvantaged students who are students with disabilities or English learners, in a manner consistent with, as appropriate, the IDEA (regarding students with disabilities) and civil rights laws, in particular, section 504 of the Rehabilitation Act of 1973, as amended, and title VI of the Civil Rights Act of 1964;

- 3) The extent to which the SEA will encourage innovations in charter schools, such as models, policies, supports, or structures, that are designed to improve the academic achievement of educationally disadvantaged students; and

- 4) The quality of the SEA 's plan for monitoring all charter schools to ensure compliance with Federal

**and State laws, particularly laws related to educational equity, nondiscrimination, and access to public schools for educationally disadvantaged students.**

**Strengths:**

The application identifies the significant share of educationally disadvantaged students in the state and describes a promising plan to offer competitive preference in subgrants to schools that agree to recruit and serve more of these students. Arizona offers clear plans for strong charter schools to be effective and retain students through the provision of professional development such as that offered through the National Charter School Resource Center and the Arizona Instructional Rounds program (p. 31-32). The state includes a risk monitoring tool as part of its monitoring of schools awarded subgrants, to ensure that schools management is compliant with respect to financial, business, and management operations (p.34). Arizona also described great specific examples of strong school models innovating and educating disadvantaged students within the state (p. 35). ASBCS includes a clear statement requiring compliance of charter operators with all federal and state laws relating to the education of children with disabilities within the charter contract (p. 36).

**Weaknesses:**

None noted

**Reader's Score: 15**

**Selection Criteria - Vision for Growth and Accountability**

**1. The Secretary determines the quality of the statewide vision, including the role of the SEA, for charter school growth and accountability. In determining the quality of the statewide vision, the Secretary considers the following factors:**

**1) The quality of the SEA' s systems for collecting, analyzing, and publicly reporting data on charter school performance, including data on student academic achievement, attainment (including high school graduation rates and college and other postsecondary education enrollment rates), retention, and discipline for all students and disaggregated by student subgroup;**

**2) The ambitiousness, quality of vision, and feasibility of the SEA' s plan (including key actions) to support the creation of high-quality charter schools during the project period, including a reasonable estimate of the number of high-quality charter schools in the State at both the beginning and the end of the project period; and**

**3) The ambitiousness, quality of vision, and feasibility of the SEA' s plan (including key actions) to support the closure of academically poor-performing charter schools in the State (i.e., through revocation, non-renewal, or voluntary termination of a charter) during the project period.**

**Note: In the context of closing academically poor-performing charter schools, we remind applicants of the importance of ensuring adherence to applicable laws, policies, and procedures that govern the closure of a charter school, the disposition of its assets, and the transfer of its students and student records.**

**Strengths:**

ADE has a clear partnership with the largest authorizer, ASBCS, which includes data sharing and public presentation of charter school performance metrics (p. 37) including student progress over time, student achievement by subgroup, and post-secondary readiness (including graduation rates). This strong data sets the stage for the ambitious goals Arizona presents in its plan for new and replicated schools serving disadvantaged students (p. 38). Arizona requires authorizers to create performance frameworks for evaluating schools in their portfolio and ASBCS has frameworks for evaluating academic, financial and operational performance of schools. These frameworks provide clear expectations for schools and have increasing consequences for poor academic performance, beginning two years into a charter contract. Arizona provides evidence that the ASBCS frameworks, established in 2012, have worked by resulting in the closure of 86 charter entities over the past 3 years.

**Weaknesses:**

The plan for presenting data lacks information about retention and discipline for student subgroups. Additionally, the plan for data reporting is limited to sharing via a website and does not include information about other means of data access nor access in multiple languages. This single method of data sharing may exclude families of educationally disadvantaged students such as those described in the Arizona application. While the applicant provides both short term and long-term impact goals, these lack details to help evaluate the feasibility of the goals during the grant period.

Reader's Score: 9

**Selection Criteria - Dissemination of Information and Best Practices**

1. The Secretary considers the quality of the SEA's plan to disseminate information about charter schools and best or promising practices of successful charter schools to each LEA in the State as well as to charter schools, other public schools, and charter school developers (20 U.S.C. 7221b(b)(2)(C) and 7221(c)(f)(6)). If an SEA proposes to use a portion of its grant funds for dissemination subgrants under section 5204(f)(6)(B) of the ESEA (20 U.S.C. 7221c(f)(6)(B)), the SEA should incorporate these subgrants into the overall plan for dissemination. In determining the quality of the SEA's plan to disseminate information about charter schools and best or promising practices of successful charter schools, the Secretary considers the following factors:

1) The extent to which the SEA will serve as a leader in the State for identifying and disseminating information and research (which may include, but is not limited to, providing technical assistance) about best or promising practices in successful charter schools, including how the SEA will use measures of efficacy and data in identifying such practices and assessing the impact of its dissemination activities;

2) The quality of the SEA's plan for disseminating information and research on best or promising practices used by, and the benefits of, charter schools that effectively incorporate student body diversity, including racial and ethnic diversity and diversity with respect to educationally disadvantaged students, consistent with applicable law;

3) The quality of the SEA's plan for disseminating information and research on best or promising practices in charter schools related to student discipline and school climate; and

4) For an SEA that proposes to use a portion of its grant funds to award dissemination subgrants under section 5204(f)(6)(B) of the ESEA (20 U.S.C. 7221a(f)(6)(B)), the quality of the subgrant award process and the likelihood that such dissemination activities will increase the number of high-quality charter schools in the State and contribute to improved student academic achievement.

**Strengths:**

The applicant provides evidence of past experience by the state CSP with identifying success and sharing it both within and beyond the state. The AZ Charter Schools Program received a National Leadership Activities grant and presented best practices in using evidence-based qualitative leading indicators to predict school success at a national meeting for CSP project directors (p. 39). The SEA also hosts an annual state-level Summit for subgrantees, and invites presentation by charter schools at the SEA-sponsored "Leading Change Conference" for educators in all schools (p. 40). The state describes a plan for subgrant applications that request information on school plans to incorporate diversity and utilize strategies that support disadvantaged students (p.41). The ADE plan also includes action research and mixed-methods research to identify any subgrantee promising practices for working with disadvantaged students and creating a positive school for dissemination. Strong future plans also include continued past practices, a newsletter, and an external program evaluation (p. 42).

**Weaknesses:**

None noted

### Selection Criteria - Oversight of Public Chartering Agencies

1. **The Secretary considers the quality of the SEA 's plan (including any use of grant administrative or other funds) to monitor, evaluate, assist, and hold accountable authorized public chartering agencies. In determining the quality of the SEA' s plan to provide oversight to authorized public chartering agencies, the Secretary considers how well the SEA' s plan will ensure that authorized public chartering agencies are --**
  - 1) **Seeking and approving charter school petitions from developers that have the capacity to create charter schools that can become high-quality charter schools;**
  - 2) **Approving charter school petitions with design elements that incorporate evidence-based school models and practices, including, but not limited to, school models and practices that focus on racial and ethnic diversity in student bodies and diversity in student bodies with respect to educationally disadvantaged students, consistent with applicable law;**
  - 3) **Establishing measureable academic and operational performance expectations for all charter schools (including alternative charter schools, virtual charter schools, and charter schools that include pre-kindergarten, if such schools exist in the State) that are consistent with the definition of high-quality charter school as defined in this notice;**
  - 4) **Monitoring their charter schools on at least an annual basis, including conducting an in-depth review of each charter school at least once every five years, to ensure that charter schools are meeting the terms of their charter or performance contracts and complying with applicable State and Federal laws;**
  - 5) **Using increases in student academic achievement as one of the most important factors in renewal decisions; basing renewal decisions on a comprehensive set of criteria, which are set forth in the charter or performance contract; and revoking, not renewing, or encouraging the voluntary termination of charters held by academically poor-performing charter schools;**
  - 6) **Providing, on an annual basis, public reports on the performance of their portfolios of charter schools, including the performance of each individual charter school with respect to meeting the terms of, and expectations set forth in, the school 's charter or performance contract;**
  - 7) **Supporting charter school autonomy while holding charter schools accountable for results and meeting the terms of their charters or performance contracts; and**
  - 8) **Ensuring the continued accountability of charter schools during any transition to new State assessments or accountability systems, including those based on college- and career-ready standards.**

#### **Strengths:**

Arizona law requires authorizers to report to the state annually on the performance of all schools in their portfolio, allowing the state to hold authorizers accountable for their use of performance frameworks. The law also provides mechanisms for the removal of authorizing authority from sponsors that do not meet performance expectations (p. 42). The application describes provisions in law that require strong authorizing practices for approving schools, including alignment between the target population for the school and the proposed educational program, including schools designed to serve educationally disadvantaged students (p. 43 & 44). State law requires authorizers to adopt performance frameworks and the application clearly describes ASBCS use of such performance frameworks in their annual review of charter schools and their 5-year in-depth review (p. 45). State law also includes clear requirement that academic performance must be one of the most important factors in renewal and revocation decisions (p. 45). The ASBCS allows for a waiver of the full renewal process for successful schools seeking to replicate, and uses Performance Framework scores to reduce the paperwork and process, helping to preserve autonomy for high-performing charter schools (p. 45). The state presents a clear process for assessment transition accountability (p. 58-59).

**Weaknesses:**

The applicant does not clearly describe a plan to seek high-quality charter school applicants, though they do clearly describe the plan to approve petitions that come before them. The application also neglects to mention any plans to focus on approving models that support racial and ethnic diversity.

**Reader's Score:** 14

**Selection Criteria - Management Plan and Theory of Action**

1. The Secretary considers the quality of the management plan and the project's theory of action. In determining the quality of the management plan and the project's theory of action, the Secretary considers the following factors:

1) The quality, including the cohesiveness and strength of reasoning, of the logic model (as defined in 34 CFR 77.1(c)) and the extent to which it addresses the role of the grant in promoting the State-level strategy for using charter schools to improve educational outcomes for students through CSP subgrants for planning, program design, and initial implementation; optional dissemination subgrants; optional revolving loan funds; and other strategies;

2) The extent to which the SEA's project-specific performance measures, including any measures required by the Department, support the logic model; and

3) The adequacy of the management plan to --

i. Achieve the objectives of the proposed project on time and within budget, including the existence of clearly defined responsibilities, timelines, and milestones for accomplishing project tasks; and

ii. Address any compliance issues or findings related to the CSP that are identified in an audit or other monitoring review.

**Note:** The Secretary encourages the applicant to propose a comprehensive management plan and theory of action for assessing the achievement of the objectives, including developing performance measures and performance targets for its proposed grant project that are consistent with those objectives. The applicant should clearly identify the project-specific performance measures and performance targets in its plan and should review the logic model application requirement and performance measures section of this notice for information on the requirements for developing those performance measures and performance targets consistent with the objectives of the proposed project. The applicant may choose to include a discussion of the project-specific performance measures and targets it develops in response to the logic model requirement when addressing this criterion.

**Strengths:**

Arizona's logic model is clear and strong with performance measures and activities that are easy to follow across all 3 management goals. The applicant also provides a thorough explanation of the resolution of an audit finding (p. 54).

**Weaknesses:**

Despite the clarity of the logic model, the management plan is lacking some key information to evaluate its quality. There are some missing baseline data for comparison with traditional public schools (i.e., grad rate for educationally disadvantaged students in non-charter schools), making it difficult to assess the efficacy of some of the performance metrics. The plan also lacks information on staffing to explain how the project will be completed on time and within budget.

**Reader's Score:** 8

## Selection Criteria - Project Design

1. The Secretary considers the quality of the design of the SEA 's charter school subgrant program, including the extent to which the project design furthers the SEA' s overall strategy for increasing the number of high-quality charter schools in the State and improving student academic achievement. In determining the quality of the project design, the Secretary considers the following factors:

1) The quality of the SEA' s process for awarding subgrants for planning, program design, and initial implementation and, if applicable, for dissemination, including:

i. The subgrant application and peer review process, timelines for these processes, and how the SEA intends to ensure that subgrants will be awarded to eligible applicants demonstrating the capacity to create high-quality charter schools; and

ii. A reasonable year-by-year estimate, with supporting evidence, of

a) the number of subgrants the SEA expects to award during the project period and the average size of those subgrants, including an explanation of any assumptions upon which the estimates are based; and

b) if the SEA has previously received a CSP grant, the percentage of eligible applicants that were awarded subgrants and how this percentage related to the overall quality of the applicant pool;

2) The process for monitoring CSP subgrantees;

3) How the SEA will create a portfolio of subgrantees that focuses on areas of need within the State, such as increasing student body diversity or maintaining a high level of student body diversity, and how this focus aligns with the State-Level Strategy;

4) The steps the SEA will take to inform teachers, parents, and communities of the SEA' s charter school subgrant program; and

5) A description of any requested waivers of statutory or regulatory provisions over which the Secretary exercises administrative authority and the extent to which those waivers will, if granted, further the objectives of the project.

### Strengths:

The application provides strong information on past grants from AZ CSP programs, including the rationale for subgrant award size, the number of expected awards annually, historical outcomes of past grant subawards, and likely outcomes of new subawards (p. 55 & 56). ADE provides a detailed description of their monitoring program, including on-site visits and desktop monitoring, and provides a thorough set of plans to notify schools, teachers, parents and communities of available funds through a variety of media.

### Weaknesses:

None noted.

Reader's Score: 10

## Priority Questions

### Competitive Preference Priority - High-Quality Authorizing and Monitoring Processes

#### 1. Competitive Preference Priority 1: High-Quality Authorizing and Monitoring Processes

To meet this priority, an applicant must demonstrate that all authorized public chartering agencies in the State use one or more of the following:

a) Frameworks and processes to evaluate the performance of charter schools on a regular basis that include--

1) Rigorous academic and operational performance expectations (including performance expectations related to financial management and equitable treatment of all students and applicants);

2) Performance objectives for each school aligned to those expectations;

3) Clear criteria for renewing the charter of a school based on an objective body of evidence, including evidence that the charter school has (a) met the performance objectives outlined in the charter or performance contract; (b) demonstrated organizational and fiscal viability; and (c) demonstrated fidelity to the terms of the charter or performance contract and applicable law;

4) Clear criteria for revoking the charter of a school if there is violation of law or public trust regarding student safety or public funds, or evidence of poor student academic achievement; and

5) Annual reporting by authorized public chartering agencies to each of their authorized charter schools that summarizes the individual school 's performance and compliance, based on this framework, and identifies any areas that need improvement.

b) Clear and specific standards and formalized processes that measure and benchmark the performance of the authorized public chartering agency or agencies, including the performance of its portfolio of charter schools, and provide for the annual dissemination of information on such performance;

c) Authorizing processes that establish clear criteria for evaluating charter applications and include a multi-tiered clearance or review of a charter school, including a final review immediately before the school opens for its first operational year; or

d) Authorizing processes that include differentiated review of charter petitions to assess whether, and the extent to which, the charter school developer has been successful (as determined by the authorized public chartering agency) in establishing and operating one or more high-quality charter schools.

**Strengths:**

The largest authorizer, ASBCS, authorizes 99.9% of all charter schools in the state. ASBCS uses performance frameworks for Academic, Financial and Operational performance (p.11), but the applicant notes that the statute requires authorizers to use a performance framework. The application describes transparent performance expectations for all charters. State statute requires sponsors must consider “sufficient progress toward academic performance expectations” as “one of the most important factors” for renewal or revocations (p. 12). The state statute also allows for revocation outside renewal cycle (p. 12). The state provides dashboards with open and transparent data on ASBCS website (p. 13) and the law requires a formal process for reviewing authorizer portfolios (p. 13) which may result in the revocation of the authorizer (“sponsor”) authority (p. 14). The state has a strong charter application review process (p. 14), established in Arizona Administrative Code. This process includes multiple reviews of charter applications before approval, including a review by an expert Technical Review Panel and a required review of all documentation before the school’s opening day. ASBCS offers a shorter, streamlined application for replicating operators (p. 15).

**Weaknesses:**

None noted

**Reader's Score:** 15

**Competitive Preference Priority - Authorizer other than LEA or Appeal Process**

**1. Competitive Preference Priority 2: One Authorized Public Chartering Agency Other than a LEA, or an Appeals Process**

To meet this priority, the applicant must demonstrate that the State--

a) Provides for one authorized public chartering agency that is not an LEA, such as a State chartering board, for each individual or entity seeking to operate a charter school pursuant to State law; or

b) In the case of a State in which LEAs are the only authorized public chartering agencies, allows for an appeals process for the denial of an application for a charter school.

**Note:** In order to meet this priority under paragraph (b) above, the entity hearing appeal must have the authority to approve the charter application over the objections of the LEA.

**Strengths:**

Arizona state statute provides for multiple authorizers (p. 15). There are at least two non-LEAs authorizing charter schools in the state: ASBCS, which authorizes 99.9% of charter schools in the state, and Arizona State University, which authorizes 3 charters or .05% of all charters in the state (p. 16).

**Weaknesses:**

None noted

**Reader's Score:** 5

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**Status:** Submitted  
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