

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

Status: Submitted

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Technical Review Coversheet

Applicant: STATE OF OHIO/DEPARTMENT OF EDUCATION (U282A150023)

Reader #1: *****

	Points Possible	Points Scored
Questions		
Selection Criteria		
State-Level Strategy		
1. State-Level Strategy	15	15
Sub Total	15	15
Selection Criteria		
Policy Context for Charter Schools		
1. Policy Context	5	5
Sub Total	5	5
Selection Criteria		
Past Performance		
1. Past Performance	10	7
Quality of Plan to Support Ed. Dis. Students		
1. Ed. Dis. Students	15	13
Vision for Growth and Accountability		
1. Growth and Accountability	10	4
Dissemination of Information and Best Practices		
1. Dissemination	10	6
Oversight of Public Chartering Agencies		
1. Oversight of Authorizers	15	12
Management Plan and Theory of Action		
1. Management Plan	10	10
Project Design		
1. Project Design	10	10
Sub Total	80	62
Priority Questions		
Competitive Preference Priority		
High-Quality Authorizing and Monitoring Processes		
1. CPP 1	15	15
Sub Total	15	15
Competitive Preference Pritority		
Authorizer other than LEA or Appeal Process		

1. CPP 2

	5	5
Sub Total	5	5
Total	120	102

Technical Review Form

Panel #9 - SEA Panel - 9: 84.282A

Reader #1: *****

Applicant: STATE OF OHIO/DEPARTMENT OF EDUCATION (U282A150023)

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 charter/choice strategies are well integrated to the State-level strategy (and RTTT plan, 10 items/components delineated on pp. 13-14).

Clear criteria and definitions are included within the components (pp. 13-14).

The funding parity includes 25M State funding for charter facilities (p. 14).

There is a provision for discrete funding (beyond CSP) for Recovery Districts, including charters (p. 14) and a commitment for parity: the 'ODE is enhancing the State's Academic Distress Commission concept, established by the State Superintendent pursuant to ORC 3302.10, by providing supplemental sources of funding to charters in "recovery districts" overseen by these Commissions'.

The application illustrates a well-established collaboration with Community Education Development Organizations (CEDOs) to target high-risk students and shared priorities (pp. 15f.)

The narrative includes 'Provoked' collaboration - Ohio Community Collaboration Model for school Improvement (OCCMSI), including targeted goals (Figure 1.

Specifically, there is a determined focus on the priority of serving at risk students; CEDO: Cleveland Transformation Alliance (CTA) to focus, collaboratively, on the highest priority, i.e., provides good options in the lowest performing

communities.

Overall, a very clear and carefully planned strategy.

Ohio has established high and exacting accountability expectations of authorizers (including evaluation against standards) and, inferentially, schools. This is critical to their plan and the priority of high quality authorizing permeates this and other sections of the application.

Weaknesses:

No weaknesses noted.

Reader's Score: 15

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:

Charters are LEAs and as such, they have a high degree of autonomy; protected in Statute (operations, learning program, budgets, etc.), have access to the same State and Federal funding, and the same high measures of accountability (pp. 17ff.).

Annually the ODE apprises schools of the federal entitlement funding opportunities and provides technical assistance (e.g., Consolidated Application (pp. 18f.)).

ODE has well-defined processes so that payments to schools are timely. Five months after the initial allocation, a second review is conducted by the Office of Federal Student Programs to make allocations to new charter schools and adjust allocations to all other LEAs. This twice annual allocation calculation ensures that charter schools and all other LEAs

receive their share of federal education funding and title funds (.p 19).

In reference to Individuals with Disabilities Education Act (IDEA), the Age Discrimination Act, Civil Rights Act, Title X, and Section 504 of the Rehabilitation Act, Authorizers verify school compliance with all applicable State and Federal laws during twice annual site visits (p. 20).

Weaknesses:

No weaknesses 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:

Ohio has increased the number of school choices (strong growth) in the past five years (p. 20 and data on p. 21) and is dedicated to the priority of creating strategies to serve at-risk students by authorizing high-quality schools.

Included in the strategy is demonstrated evidence and willingness to close poor performing schools (p. 22).

Weaknesses:

Across the charter sector, especially for at-risk students (compared to the Ohio 8), performance has been disappointing since this is a priority focus (pp. 22f, e.g., graduation rates). It is critical that quality of school choice is a focus (not just quantity). Ohio should have a deep well of data and best practices as evidence for requesting CSP funds.

There is insufficient data to determine 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.

Selective data sets suggest a focus on how to scale 'quantity' (rather than quality).

Contractual non-compliance issues have resulted in 60 school closures in the past five years. There is no evidence that this data has been used to shape the work moving forward so that these deleterious numbers are reduced significantly, either by not opening marginal schools and/or increasing the oversight by authorizers.

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:

Through this section there is a focus on the penultimate agency of authority: the authorizers and the important of high-quality authorizers (including an evaluation), including renewed efforts to improve the authorizer performance (NACSA's Authorizer Quality Performance Review – AQPR, pp. 28f.) in special reference to the priority: to support educationally disadvantaged students.

Statutes, policies, and practices that advocate for and protect ED students and their access and rights, including the Ohio Improvement Process, p. 24.

There is an effort to aggressively replicate successful schools and models that serve at-risk students, primarily in the Ohio 8.

The Priority Focus is integral to the ESEA waiver (p. 24).

The MMR (4), includes a 'gap' closing focus (pp. 12, 12, 16, 24).

The QSC social science research will disseminate best practices - this 'social' focus is very innovative, in addition to the rich data banks of other data, especially the potential to measure school climate and 'discipline' (pp. 24f.)

Ohio has developed a Planning Tool and Funding Application guide the schools and monitor for compliance (pp. 25f.)

Weaknesses:

The application lacks examples of extant innovation in the high-quality schools (p. 25 and Past Performance).

The application lacks references to data collected from past experiences in reference to the 'Social' and 'climate' in focus schools.

The application lacks a specific plan to promote the dissemination of innovative practices (though a 'comprehensive' plan is referenced) or what 'innovation' means (p. 25).

The application lacks references to cloud-based, best-in-class compliance tools and processes (i.e., only mentions electronically filing of application materials, p. 26).

Reader's Score: 13

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:

Ohio consistently places a focus on the penultimate agency of authority: the authorizers (pp. 27f.), including a renewed efforts to improve the authorizer performance (NACSA's Authorizer Quality Performance Review - AQPR), pp. 27-30.

The data mines are deep, rich, and accessible (p. 27; cf. Appendix E).

Data reports are required at every level and are published and accessible to the public (p. 28; cf. Appendix E).

There is strong and clear closure criteria and processes (pp. 29f.).

Weaknesses:

Ohio's proposal is predicated on authorizer capacity. While there is clear language reading authorizer accountability throughout the application, there is no mention of this aspect. The application makes assertion that the authorizers are key and success is predicated on the assumption that there is capacity in the current and/or planned authorizer

community. Yet, with increased accountability, authorizers will need to build capacity and the addition of new schools that require approval and oversight requires some documentation regarding capacity.

Related to the above comment, there is no mention of commensurate efforts to fund the capacity building efforts required in the authorizing community/sector.

There is no mention of how involved the authorizers were in the NACSA work and the Gantt for authorizer reviews. Concern: with increased responsibilities, increasing the size of the portfolio might be difficult.

The application materials place an unbalanced focus on 'compliance' to the neglect of 'innovation' and demonstrable evidence of 'successful' schools that will be replicated.

The numbers are very aggressive and not adequately informed by data, especially Past Performance.

Reader's Score: 4

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 plan for dissemination is promising, including: Charter School Promising Practices Dissemination Network, lead by a steering committee represented by a very a broad group of stakeholders (p. 31 and Figure 8), including associations, schools, and authorizers.

Ohio proposes to establish a 'clearinghouse' of best practices, especially for at-risk students and schools that serve more than 40% at-risk students.

The Ohio Improvement Process requires schools to analyze various aspects of school climate. ODE will engage resources at the Ohio Educational Research Center (p. 34) identify strategies to ensure and improve quality data collection around these issues – especially identify Ohio-specific examples – and disseminate (p. 34).

Weaknesses:

The anticipated growth is not predicated on the research and dissemination of best practices. This work is in 'plan' mode, including the 'social' aspects that affect climate and 'discipline'.

In this application, growth overshadows quality. Given the large number of extant charters and the anticipated growth, there is not sufficient evidence to suggest that replication and growth should be supported to the degree requested.

There is a lack of detail regarding 'identifiers' that will be used to determine what is worthwhile to disseminate, especially in reference to educationally disadvantaged students.

There is a lack of detail regarding 'identifiers' that will be used to determine what is worthwhile to disseminate, especially in reference to student discipline and school climate.

The application includes no evidence (from The Past Performances or otherwise in this section) of extant practices and/or schools that receive the 'seal of approval' (pp. 31, 32, 35).

Reader's Score: 6

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 application consistently places a focus on the penultimate agency of authority and authorizers are evaluated.

Authorizers are required to update contract and make evidence-based decisions (for approving, monitoring and renewing/non-renewing schools, pp. 36f.).

There are significant efforts to improve the authorizer performance (NACSA's Authorizer Quality Performance Review – AQPR, pp. 36-39). The section includes excellent delineation of the roles and responsibilities of authorizers.

Annual reports are published as public documents (p. 38f.).

Criteria regarding the approval of petitions (or applications) are covered in one of the six critical areas of the APQR (p. 35).

Weaknesses:

The application includes no indication that authorizers have been involved in this critical work. E.g., 'ODE insisted that authorizers...' (p. 37).

In reference to the Authorizers' accountability of charter schools through transitions to new assessments or accountability systems, there is a lack of detail regard Statute and/or authorizer evaluation criteria that delineates detail regarding the obligation (including terms and conditions) to insure that the contract reflect new assessment measures.

Reader's Score: 12

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 application includes a clear and detailed logic model (p. 40) that is well aligned to the narrative.

Overall, the plan is very cohesive, internally tight and well presented in Figure 10, including staffing responsibilities, timelines, and deliverables (pp. 47f.).

The application includes a well designed Organization and Staffing Plan (pp. 46f.) with good detail regarding roles and responsibilities.

Weaknesses:

No weaknesses noted.

Reader's Score: 10

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:

There are preference (weighted) priorities aligned with the State priorities and the Federal CSP priorities (pp. 51f.), including Strategic Placement (10 points); High Need Location (8 points); Educationally Disadvantaged Students (5 points); Proven Education Model (5 points); Dropout Prevention and Recovery (3 points). Alone, each of these indicators have added value and because most are not mutually exclusive, the weights augment and effectively reach at-risk students.

The application delineates a clear understanding of the importance of 'exemplary' authorizers, including the support of ODE and training (in collaboration with NACSA).

There is collaboration among and engagement of stakeholders (e.g., CEDO, p. 54). This is critical so that limited resources have a laser focus.

The application includes clear and well-defined processes, including monitoring for compliance of subgrantees (pp. 58f.).

A waiver is requested and reasonable in light of the Vision and Growth plan (p. 60).

Weaknesses:

No weaknesses 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:

Ohio has established Frameworks that include strong and clear language for the expectations and evaluations of charters AND authorizers. The Frameworks and monitoring are based on NACSA's P&S (pp. 7-10).

By January 2016, authorizers overseeing 90% of the charters will have been evaluated (p. 10). This is exemplary.

The Frameworks include five comprehensive components (p. 7) that are evaluated a minimum of twice annually (p. 7).

The application includes clear criteria for revocation and nonrenewal (p. 9).

Ohio requires authorizer annual reports for each school, reported out to the community (and parents) (p. 9).

The Office of Quality School Choice (QSC) evaluates authorizers and posts the reviews for public consumption, Authorizer Quality Performance Review (AQPR) with metrics (Exhibit E).

Ohio respects various 'types' of authorizers and schools and a differentiated review of authorizers based on evidence (p. 11).

Weaknesses:

No weaknesses 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:

Ohio meets the criteria: there are 65 active authorizers. most of which are LEAs. However, the majority of schools are chartered by non-LEA authorizers: federal non-profit organizations, a state university, and a number of educational service centers. ODE is also an authorizer through its Office of School Sponsorship. There is no statutory appeal rights for an applicant; however, there are a multitude of authorizers available to any applicant (p. 12).

Weaknesses:

No weaknesses noted.

Reader's Score: 5

Status: Submitted

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Status: Submitted

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Panel #9 - SEA Panel - 9: 84.282A

Reader #2: *****

Applicant: STATE OF OHIO/DEPARTMENT OF EDUCATION (U282A150023)

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 State has in place a broad set of strategies school to support effectiveness. The process indicates a clear integration into the State's overall vision for improving student achievement. This initiative is important and serves as a means to ensure the a solid connection to on-going development of school options statewide. (page 13) The key strategies are:

- academic content standards
- statewide assessments
- high standards for high school graduation
- accountability system
- third grade reading guarantee
- performance standards for school leadership
- options to expand access to students attending lowest performing schools
- innovation
- equitable funding

Efforts to ensure Charter funding equity is evident in the state level strategy. (Page 14) Efforts include:

- Equitable funding formula for charter schools
- Tax levies
- Facilities funding for high quality schools
- Supplemental funding for recovery districts

An innovative plan is described to collaborate with established urban community consortium, known as community education development organizations, to support student academic achievement. The

State Department of Education will work with these groups to: (Page 15)

- connect school efforts to "accelerator activities" fostered by the community groups
- determine subgrant priorities
- prioritize awards
- foster fiscal and political support

The applicant describes the Cleveland Transformation Alliance as the catalyst to support efforts to develop charter school options for students currently attending the state's lowest performing schools. (Page 16) It is the role of this organization to:

- assess school quality
- build awareness of quality school options
- engage families in the school choice decision making process
- monitor the quality of schools
- monitor school growth

Weaknesses:

The Ohio Community Collaboration Model for School Improvement (Page 16) does not clearly indicate a rigorous process to support ongoing, effective collaboration between charter schools and public schools throughout the state. The response would be improved with the addition of details explaining how the plan will be sustained over time.

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 narrative describes high levels of school autonomy and flexibility that are bolstered by state statute ORC 3314.05 exempting schools from significant school laws. These elements are likely to ensure flexibility and autonomy for the state's in key education areas including: (Pages 17-18)

- curriculum design
- establishing academic goals
- instructional methods
- open enrollment
- board rules and structure

An appropriate process is in place to ensure schools receive federal funds in a timely manner, which provides the charters the resources needed for effective operations and management. Page 19) Efforts include:

- notifications
- Online platform to access federal funding
- dis-aggregate data collection for students in low social economic settings
- mid-year enrollment review and subsequent funding adjustment

The applicant describes appropriate oversight of LEA charter schools to ensure federal compliance for IDEA, Age Discrimination Act, the Civil Rights Act, Title X, the Rehabilitation Act. (Page 20)

Weaknesses:

The plan to inform charter schools about available federal funding does not clearly describe a strong follow up or evaluation process to ensure schools are notified about available funding options. It is also not clear whether the SEA provides continuous support for school efforts to acquire federal funding for which they are eligible. (Pages 19-20)

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 provides a variety of charts as evidence of effective past performance. The data found within the charts and the narrative indicate:

- a significant increase in the number of high quality charter schools in the state (figure 2, page 21)
- a reduction in the number of poor performing charter schools throughout the state (figure 3 and figure 4, Page 22)
- similar achievement levels in high performing charter and high performing traditionally public (figure 5, Page 22)
- the percentage of academically poor-performing charter schools in the State (Figure 6, Page 23)

The data indicates progress over the previous five years in key areas overall in the areas of increasing the number of high quality charter schools in the state, reducing the number of poor performing schools in the state, and providing promising educational options for the targeted student population. (pages 21-23)

Weaknesses:

There are no weaknesses evident in this area.

Reader's Score: 10

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 State will focus efforts to assist educationally disadvantaged students in meeting and exceeding State academic goals by focusing on building the capacity of charter authorizers. (Page 23) It is evident this strategy is likely to increase the replication of successful school models within under resourced school districts. These efforts are bolstered by state flexibility waivers, State Department of Education tracking, and prioritizing the geographic regions of greatest need. As such, this model is likely to ensure an increase in the number of charter schools serving academically disadvantaged students in struggling communities. (pages 23 & 24)

The SEA reports it will embed applicant requirements that address the needs of the targeted student population. Efforts include embedding requirements in the subgrant application process addressing

--recruitment, enrollment and dissemination

--program innovation based on best practices. (page 25)

The applicant describes a robust set of processes intended to support efforts to reduce achievement gaps for academically disadvantaged students. State grant guidelines will hold subgrantees accountable for measurable improvements in academic progress for economically disadvantaged students. Also, research outcomes will be used to identify best practices to be shared with subgrantees through a variety of formats. (page 24)

A variety of practical actions are planned to reduce or eliminate achievement gaps including:

- identifying issues and addressing them through targeted actions steps and measures
- focusing efforts on sub group achievement
- supporting funding changes to expand resource options
- early learning strategies
- career and college readiness strategies

The applicant plans to embed innovation into the subgrantee application process by awarding subgrants to candidates with rigorous innovation models. (Page 25)

Subgrantees are monitored quarterly in pertinent areas to ensure solid compliance of governing entities. The applicant describes the response for schools requiring improvement based on a corrective action plan. (Page 26) and provides detail on how the grants application and verification system is used to monitor subgrantees compliance. (Page 26)

Weaknesses:

The applicant does not clearly articulate a specific plan describing how innovation will be implemented. (Criteria 3) The response in this area could have been strengthened if the applicant had provided details describing goals and indicators of success to be used for ensuring school instructional and programmatic innovation to meet the needs of educationally disadvantaged students.

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 application indicates a comprehensive vision for increasing high quality charter school options for educationally disadvantaged students. The SEA reports an ambitious goal for charter school expansion and oversight that includes

- a focus on authorizers accountability
- eliminating low-performing schools
- providing support to build capacity of current schools to meet high quality school goals. (Pages 26-27)

This vision is likely to expand the options for high quality charter schools for the targeted populations.

The applicant reports a robust data collection system is in place to collect, analyze and share data on charter school performance. (Page 27) The Education Management System is used by traditional and charter school sites and is used to provide annual report to determine school grades throughout the state. This effort indicates a commitment to. (Page 28).

On pages 28-29 the proposal describes 4 key actions to drive the SEA goal of creating high quality schools. The key actions indicate an appropriately ambitious effort and feasible expectations. Key actions include:

- Implementing APQR authorizer rating process
- focus on monitoring and rating charter authorizers
- annual grant opportunities targeting successful charter school networks
- limited authorization to include only applicants most likely to create a high-performing school

Expected outcomes from the actions include: (Page 30)

- Decreasing the number of low performing schools
- Increase the number of high performing schools
- Improve school quality of portfolios

The narrative indicates a clear plan to support the closure of academically poor performing charter schools in the state during the project period. The primary actions is to use the AQPR for decision making regarding the closure of poor performing schools.

Weaknesses:

The applicant does not clearly articulate targeted training or resources or support for new charters as an effort to build school capacity to function as a high quality charter school.

The plan appears somewhat over ambitious with regard to a goal of 400 total charter schools to be established by the end of the grant cycle. (Page 27) The response in this area would be improved with greater detail on specific steps, such as SEA staffing changes or training to build authorizer capacity to ensure the likelihood that the ambitious goals have appropriate support during the grant cycle.

Reader's Score: 7

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:

Based on the information found in the narrative, the SEA has identified an appropriate plan to identify, disseminate and support efforts to ensure best practices in charter schools throughout the state. This plan is based on approaches currently in use and will rely on the development of a network to share promising practices, (page 31). Key elements of the network include identifying current best practices based on research and making the outcomes available in an online resource clearinghouse. A steering committee will guide the development of the plan, and dissemination will be conducted using a variety of face to face and computer based platforms. (page 32)

The applicant also plans to focus on racial and ethnic diversity by identifying national research to support efforts to select state schools with a track record of success with diverse populations (page 33) The selected schools will be used as “case studies” (page 33) to accentuate key elements of charter schools success including academic progress and operational management.

The narrative describes a solid statewide dissemination plan, which includes a solid plan of action, expected activities, deliverables, and timelines to research and share with stakeholders. The plan also includes research based efforts to identify and expand school climate and discipline goals. The SEA will collaborate with the Ohio Education Research center to meet goals in this area. These strategies appear appropriately robust and are likely to ensure a broad group of stakeholders are kept abreast of initiatives, expectations, and outcomes. (Page 34)

Weaknesses:

The dissemination plan does not indicate what specific elements will be targeted within the dissemination plan. (Criteria 3) The response in this area would be strengthened with the addition of details describing specific objectives, requirements, and indicators of success that will guide decisions to renew, revoke, or place a charter in a probationary status.

Reader's Score: 8

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 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:

On page 36 of the proposal, the applicant describes a comprehensive process to support efforts seeking effective authorizers. The plan is guided by state statute (ORC 3314.016, Page 36) and includes 3 indicators to rate authorizer capacity based on

- academic performance of operating school in the authorizers region
- effective school monitoring
- following quality practices with fidelity.

Additionally, authorizer expectations include: (Page 37)

- proving a comprehensive applications, review, and approval procedures are in place
- using extensive data for evaluation of submitted charter school applications
- thorough interview processes
- comprehensive review of applicant capacity

The proposal provides a description of annual charter school monitoring policies that are in keeping with grant criteria. Policies are support by state law (ORC 3314.03(D), Page 37) and are likely to ensure rigorous oversight of the state authorizing bodies. The key areas of oversight require authorizers to:

- monitor contract compliance
- annually evaluate academic and fiduciary effectiveness
- perform multiple site visits throughout the school year.

The use of achievement data is evident in renewal decision making according to the indicators found in the authorizer's rubric and the SEA policy mandates authorizers to report evaluation outcomes annually. Additionally, state laws bolster charter school autonomy and the authorizer review process includes adherence to school flexibility. (Page 38)

The SEA proposal indicates the State is experiencing assessment transitions. (Page 40) The narrative summarizes the expectations for authorizers to ensure charter schools receive appropriate support during this transition based on provisions embedded in charter school contracts.

Weaknesses:

It is not clear how the SEA will evaluate evidence based efforts are in place for specific school models and practices or in what ways the SEA expects the models to impact racial and ethnic diversity in student bodies with respect to educationally disadvantaged students. (Criteria 2). To improve the response in this area, the application would require details on the expectations and indicators of success in this area to be embedded in the monitoring process.

The applicant does not clearly articulate how the established academic and performance expectations of state charter schools are specifically consistent with the definition of high-quality charter schools. (Criteria 3) A detailed description of the alignment between the evaluation process and the ways in which this is likely to ensure the creation of high quality schools would improve the response in this area.

The proposal does not summarize a policy or process to ensure timely in-depth reviews that ensure schools are meeting the terms of their contracts according to state and federal laws. (Criteria 7). The application would be improved with a description of indicators of success in this area.

Reader's Score: 8

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 State Department of Education proposes a project model that clearly describes the extent to which state wide plans will promote strategies for the creation of high quality charter schools throughout the state. The logic model indicates specific goals are in place, including quality plans for schools, expanding the number of high quality charter schools, and improved outcomes for students. These goals, if implemented with fidelity, are likely to ensure the effective implementation of the Management Plan while providing rigorous leadership and oversight of the State's charter school

projects. (Page 40)

The applicant proposes implementing a set of research based rubrics to establish state wide performance measures for the application process, and meeting state standards. The 80% target appears appropriately ambitious and includes a priority to meet the needs of academically disadvantaged students in targeted, under-resourced communities. The implementation of this rubric is likely to ensure robust, consistent applicant evaluation. (Pages 44-46)

The applicant provides a comprehensive logic model that includes a broad set of planning expectations. It is evident that the indicators found within the logic model align with the overall Management Plan, particularly the SEA focus on using CSP funding to create high quality charter schools throughout the state.

The proposal describes two key areas of evaluation within the state project management plan and indicates a model is in place to support meeting the objectives within budget in a timely manner. The applicant provides a detailed action plan that clearly outlines the strategies and focuses on the target student population. The strategies, if implemented with fidelity, are likely to ensure the expansion of high quality charter schools throughout the state. The key components of the overall plan include:

- organization and staffing
- Strategies/Activities Work Plan (Page 45)

Weaknesses:

The applicant's response does not fully describe strategies to be embedded in the subgrant application that will guide applicants to identify specific ways in which their projects are expected to ensure the establishment of high quality schools. (Criteria 1). The response in this area would be improved with the addition of application incentives, such as competitive priority points, to ensure the selection of developers committed to the SEA goal to expand high quality charter school options throughout the state.

The management plan does not clearly describe specific ways in which the model is likely to ensure an increase in high quality schools. (Criteria 2) The addition of a explanation of indicators of success for this area would improve the application.

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 applicant provides a comprehensive description of the subgrant application process that includes:

--Grant types (planning and implementation grants)

--Stakeholder Collaboration

--Application Guidelines

--Review Process

--Award Policy (Page 47-51)

Additionally the proposal includes a summary of the Recover District Research that serves as a pool of funding set aside to support the creation of high quality schools. (Page 54) It appears evident that the SEA has developed a robust plan for identifying and awarding subgrants that is likely to ensure the SEA goal of expanding high quality charter school options to the targeted student population.

The applicant provides a chart (Figure 11, page 55) to describe the expected subgrant activities during the grant cycle along with funding allotment estimations that indicate a total of 25 grants averaging \$250,000 to be awarded during the grant cycle. Additionally, the applicant describes the outcomes of previous CSP state funding and the impact on academic achievement among educationally disadvantaged students. (Page 57). The evidence provides detail on the percentage of previous CSP subgrants that were awarded, and explains that past subgrant awards were utilized to create a significant percentage of effective charter schools during the grant period. These efforts indicate the State has effectively implemented a CSP project and is likely to continue to use CSP funding to expand the creation of quality charter schools to meet the needs of the targeted student populations.

The applicant includes a unique authorizer engagement process that identifies authorizes who have a track record of success meeting the needs of the targeted student population to work with charter school developers. Activities included in this effort, such as a meeting with quality developers early in the project to identify probable assistance that will be needed, supports efforts to ensure the creation of a pool of quality applicants, and bolster the likelihood of creating high quality schools. (Page 53)

Weaknesses:

There are no weaknesses evident in this area.

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:

Narrative indicates a rigorous process is in place to evaluate the performance of charter schools. The applicant relies on state and federal guidelines to inform the charter school framework and processes to evaluate school performance. The proposal identifies 5 key indicators to evaluate academic and organizational effectiveness. Schools Indicators include:

- Education programs
- Health and safety
- governance
- finance
- operations (Page 8)

The narrative specifies a clear criteria for renewing school charters based on criteria set forth in the Authorizer's Quality Practices Rubric. This comprehensive framework evaluates school commitment, capacity, oversight, performance and termination and renewal policies of state charter authorizes . The framework also establishes robust evaluation criteria a pre-opening monitoring for 1st year school sites. The framework provides insight into the level at which the charter school authorizers have been successful. (Appendix E)

Weaknesses:

While the applicant states violations are grounds for termination or charter revocation, it does not fully explain a clear plan of action for violations such as probation or timelines to correct issues.

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:

The proposal describes a variety of authorizing agencies for charter school applicants and states there are 65 available authorizers from which applicant can elect to submit a charter school application. Additionally the narrative reveals non-profit organizations authorize the majority of the state's charter schools and the State Department of Education authorizes charters as well. (Page 12)

Weaknesses:

There are no weaknesses noted in this area.

Reader's Score: 5

Status: Submitted
Last Updated: 08/03/2015 11:36 AM

Status: Submitted

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Technical Review Coversheet

Applicant: STATE OF OHIO/DEPARTMENT OF EDUCATION (U282A150023)

Reader #3: *****

	Points Possible	Points Scored
Questions		
Selection Criteria		
State-Level Strategy		
1. State-Level Strategy	15	13
Sub Total	15	13
Selection Criteria		
Policy Context for Charter Schools		
1. Policy Context	5	5
Sub Total	5	5
Selection Criteria		
Past Performance		
1. Past Performance	10	6
Quality of Plan to Support Ed. Dis. Students		
1. Ed. Dis. Students	15	11
Vision for Growth and Accountability		
1. Growth and Accountability	10	7
Dissemination of Information and Best Practices		
1. Dissemination	10	8
Oversight of Public Chartering Agencies		
1. Oversight of Authorizers	15	12
Management Plan and Theory of Action		
1. Management Plan	10	10
Project Design		
1. Project Design	10	9
Sub Total	80	63
Priority Questions		
Competitive Preference Priority		
High-Quality Authorizing and Monitoring Processes		
1. CPP 1	15	13
Sub Total	15	13
Competitive Preference Priority		
Authorizer other than LEA or Appeal Process		

1. CPP 2

	5	5
Sub Total	5	5
Total	120	99

Technical Review Form

Panel #9 - SEA Panel - 9: 84.282A

Reader #3: *****

Applicant: STATE OF OHIO/DEPARTMENT OF EDUCATION (U282A150023)

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's Charter Schools Program activities are clearly aligned with the 10 key components of the state's overall education strategy (p.12-14).
- Not only is the state's funding formula the same for charter schools as it is for traditional public schools (p.14), it also a) provides charter schools the opportunity to seek additional funding including tax levies; b) includes a line item in the state's budget for charter school facilities; and c) has an Academic Distress Commission that provides funding to charters in "recovery districts" (p.14).
- The state has begun the process of creating charter schools that serve as viable options for students that attend the lowest performing charter schools with the Cleveland Transformation Alliance (p. 16). The Cleveland Transformation Alliance is a community development education organization (CEDO) that promotes the development of high-quality charter schools in the Cleveland area by increasing family awareness about school options; empowering families to make informed choices; and by monitoring the growth and quality of charter schools.

Weaknesses:

While it has a commitment to expanding the strategies across the state (p. 16), current efforts are focused in metropolitan areas. A clear plan for initiating these efforts throughout the state needs to be developed and to include rural areas.

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:

- Under ORC 3314.04 charter schools are "exempt from all state laws and rules pertaining to schools, school districts, and boards of education, except those laws and rules that grant certain rights to parents" (p. 17). The applicant provides examples of flexibility in curriculum design, instructional methods, select members of the governing board, hire and fire employees, and contract with service providers. Each of these areas of autonomy provides schools the flexibility they need to create and operate programs that improve educational effectiveness.

Ohio provides charter schools high degrees of flexibility and autonomy given the fact that they are exempt from most laws and rules less significant and reasonable accountability measures.

- The state informs each school about funds for which they are eligible to receive through seminars, webinars, the Superintendent's Memo, and the state's consolidated grant application platform (p. 18-19). These efforts incorporate multiple modes and methods thereby increasing the likelihood that all schools have the same opportunity to access state and/or federal funds.

- ORC 3314.01(B) clearly states that charter schools are required to comply with anti-discrimination laws (p. 20). As a part their required twice annual visits, authorizers monitor compliance with such laws. Monitoring during twice annual site visits provides a reasonable level of checks and balances when combined with the performance expectations surrounding these site visits found within the state's Authorizer Quality Practices Rubric (AQPR). Items E, F, G, and H of the Oversight & Evaluation Section of the AQPR provide additional guidance on site visits as they relate to compliance with federal equity laws.

Weaknesses:

No weaknesses 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:

- Ohio has demonstrated a steady increase in the number and percentage of high quality charter schools over the past four years from 2009-2012 (p. 21). Although Ohio has not demonstrated an increase for each of the past five years in the number and percentage of high-quality charter schools, it understands that the decrease in high-quality schools was commensurate with increased performance expectations. Furthermore, the number and percentage has increased in the single, reportable year since then.

- Despite the fact that the applicant has not consistently reduced the percentage of poor-performing schools over the past five years, it has aggressively decreased the number of such schools (99 since FY11) (p. 21-22). These closures demonstrate the state's understanding of the importance of school closure and willingness to do so to ensure that students are being served by schools that provide the highest quality education to students.

Weaknesses:

- Ohio demonstrated an increase in the number and percentage of high-quality charter schools in only four of the past five years (p. 21).

- The state has not demonstrated a steady decrease in the percentage of poor-performing charter schools over the past five years (p. 21).

- The percentage of high-quality charter schools is lower than the percentage of high-quality traditional Ohio 8 schools (the eight largest urban districts in the state) in three of the five reported years (p. 22).

- The applicant does not provide overall academic performance data, specific results in reading or mathematics, nor graduation rates. Therefore, it is difficult to determine the extent to which the performance of charter school students equals or exceeds the attainment of similar students in other public schools.

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:

OH's CSP subgrant will assist educationally disadvantaged students' academic achievement by increasing the number of high quality schools where they are most needed (p.24).

The state has several strategies in place to reduce or eliminate achievement gaps. These strategies encompass compliance/reporting, best practice dissemination, and funding opportunities (p.24-25).

The state intends to require sub-grant applicants to articulate in their applications how they will recruit and retain disadvantaged students. Furthermore, the ODE is planning to disseminate best practice information related to this matter (p. 25).

The applicant ensures compliance through multiple measures and on a frequent and regular basis. These efforts include a CSP Grant Site Monitoring Form to be used by the grants manager and the assurance of compliance through the grants management system. Not only does the state have a plan to monitor, but a clear vision of intervention through Corrective Action Plans (p. 26).

Weaknesses:

It is difficult to discern the extent to which the state will encourage innovation given the fact the application includes only a statement of assurance rather than detail related to the effort.

The application lacks detail regarding access to schools for educationally disadvantaged youth.

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 data that charter schools are required to submit in Ohio's Education Management Information System results in the output of information in at least two types of public reports, individual school report cards and the ODE's report on ALL charter schools (p. 27-28). Both types of documents provide a wealth of information regarding growth and accountability.

Ohio law (ORC 3314.35) mandates the permanent closure of charter schools after poor performance (D or F on their report card) when/if it occurs in two of the three most recent years (p. 30).

Ohio has impressive and stringent criteria for school closure (p. 30) including in the event of extreme underperformance; an egregious violation of the law; a violation of public trust that jeopardizes students' health or public funds; or unfaithfulness to the terms of the contract (p. 30).

Weaknesses:

The state's plan to grow to 400 charter schools (p. 27) appears to be overly-ambitious given the state's historical growth rate of charter schools combined with their rate of school closures.

No clear plan is provided for ensuring that the state's 65 authorizers have the capacity to support this ambitious increase in the total number of schools within the proposed project period.

Reader's Score: 7

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 articulates a strong commitment to the dissemination of information. Its approach includes the formation of a Charter Schools Promising Practices Dissemination Network led by a Steering Committee with a broad base and experience (p. 31). In addition, it includes data analysis and research via the Ohio Educational Research Center (p. 32). Finally, the network has a clear vision for a dissemination plan (p.34-35).

The SEA has developed a partnership with the Ohio Educational Research Center (p.31-34) that will enrich the data analysis and research process they will use to determine which practices are worthy of dissemination.

Weaknesses:

The applicant does not describe how it will use measures of efficacy and data in identifying best and promising practices. Rather than describing how it will use measures of efficacy and data to assess the impact of its dissemination activities, the SEA simply states, "ODE will assess impact by reviewing the prior year's activities and use the results to inform future plans" (p.33). A lack of the use of efficacy and data to identify the promising practices that will be disseminated may lead to ineffective or low quality information to be released thereby potentially misleading schools and poorly using grant funds.

The state does not describe a specific plan regarding the dissemination of information regarding diversity (p. 33-34) or school discipline/climate (p. 34). To simply state that the SEA intends to do so results in uncertainty about the plan's goals, objectives, and anticipated outcomes.

Reader's Score: 8

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 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 SEA's plan to provide oversight to authorizers is based on clear and objective criteria outlined in its Authorizer Quality Practices Rubric (AQPR) and charter law (ORC 3314.03). The rubric is the evaluation document used by the state.

Below is a description of the rigorous components of the rubric and/or regulation:

- Criteria for Seeking and Approving Petitions is found in the following sections of the AQPR: Application Process & Decision Making, Rigorous Criteria for New Applicants; and Rigorous Criteria for Existing Schools.
- Criteria for Establishing Measureable Academic and Operational Performance Expectations is found in the following sections of the AQPR: Performance Contracting. The Contract Student Performance Measures in this section include the use of multiple measures of student performance (proficiency rates, academic growth, graduation rates, and attendance.
- Monitoring on an Annual Basis is a requirement of charter law ORC 3314.03 and is found in the following sections of the AQPR: Oversight & Evaluation and Cumulative Report & Performance.
- Criteria for Renewal Using Increases in Student Achievement is found in the following section of the AQPR: Termination & Renewal Decision Making which includes subsections on Evidence Based Renewal, Renewal & Non-Renewal Decisions.
- Reports to the Public is found in the following section of the AQPR: Oversight & Evaluation with the Oversight & Evaluation Report to Schools and Annual Report to Public subsections.
- Supporting Autonomy While Upholding Accountability is a requirement of charter law ORC 3314.03 and is found in the following section of the AQPR: Oversight & Evaluation.

Given the fact that the rubric is the tool the state uses to evaluate authorizer's it is highly likely that this method of oversight of authorizers is highly effective.

Weaknesses:

The state does not have clear and measurable checks and balances for ensuring that authorizers approve charter school petitions with design elements that incorporate evidence-based school models and practices (p. 36-37) as requested by the CSP criteria.

The state does not have clear and measurable checks and balances for ensuring authorizer's accountability of charter schools through transitions to new assessments or accountability systems (p. 39) as requested by the CSP criteria.

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:

Ohio's logic model is simple and sound. It depends on CSP grant funding to attract the best proposals and award subgrants to allow developers to create quality plans and operate high quality schools that will ultimately improve educational outcomes for students (p. 40).

The applicant's performance measures not only support their logic model, but the assessment of each measure will be determined by the creation of rubrics based on NACSA resources (p. 44-45).

Ohio's organization (p.47-50) and staffing plan are designed to achieve their objectives on time and within their budget (p. 46-47). The current ODE staff supporting the program have exceptional levels of education and experience (p.47).

The applicant has a plan for authorizers to act as the primary point of contact regarding compliance issues. The authorizer will work with the developer to rectify the issue and/or draft a corrective action plan (p. 50).

Weaknesses:

No weaknesses noted.

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 state has created a comprehensive and high quality application process that includes components ranging from grant types to a peer reviewer rubric. Specific strengths of the process include competitive preference priorities that match CSP priorities and meet the state of Ohio's unique needs (p. 51-52); assurance that subgrants will only be awarded to applicants that have demonstrated the capacity to create high-quality schools by only allowing authorizers that are rated as "exemplary" or "effective" apply (p. 53); and thoughtful collaboration with the Community Education Development Organization to coordinate decisions about disadvantaged students served by urban schools (p. 54).

An impressive 72% of the schools that previously received CSP subgrants achieved a value-added grade of A-C on the state's report card.

Subgrantees will be monitored both by their authorizer and the state. This will include two reviews by authorizers and "multiple" reviews by the state. To further ensure quality implementation, ODE will conduct yearly reviews of the authorizers (p. 58).

The applicant has identified five competitive preference priorities including strategic replacement, high need location, educationally disadvantaged students, proven educational models, and dropout prevention and recovery (p. 51-52) that will assist them in creating a portfolio of subgrantees that address the needs in the state. In addition they have identified objectives with regard to geographic needs, student needs, and innovative models.

The state plans on using multiple methods and types of media to reach a wide variety of individuals who may have interest in the subgrant program (p. 59-60).

Ohio is requesting a grant period of five rather than three years (p.60). The application provides justified reasoning for the request that will ensure that the state will have the necessary time and resources to meet their ambitious goals.

Weaknesses:

The SEA's plan to award 23 planning grants, 12 year-one and year-two implementation subgrants in the first year of the award and 23 year-one and year-two implementation subgrants per year after that (p. 56-57) seems to be overly ambitious given the rate of growth in the past and the potential for market saturation over time.

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:

All authorized public chartering agencies in Ohio are required to employ processes to evaluate the performance of their charter schools at least twice annually. These frameworks include:

- Clear and rigorous academic and operational performance expectations (p. 7-8). The expectations are outlined in state law, each charter contract, and their Authorizer Quality Practices Rubric. Each of the documents provided clarity to the state, the authorizer, and the school. The Rubric is of exceptional content and quality (Appendix E).
- Performance objectives are comprehensive and include depth in content, therefore align with the performance expectations (p. 8).
- The state requires that authorizers set forth clear criteria for renewal decisions and use objective data to evaluate meeting the criteria. Furthermore, states have written policies regarding renewal (p. 8).
- OAC 3301-102-05(A)(2)(a) dictates that authorizers not only make twice annual site visits, but include assessment of adherence to rule and law during those visits (p. 9).
- OAC 3301-102-5 mandates that authorizers write and submit annual reports for each of their schools ensuring that schools, parents, and the ODE understand their performance (p.9).

Weaknesses:

It is unclear from the application whether or not Ohio's authorizing process includes determining if the developer has been successful in establishing and operating one or more high-quality charter schools.

Reader's Score: 13

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:

The application clearly indicates that the state has a multi-authorizer system comprised of 65 authorizers including LEAs as well as non-profits, a state university, educational service centers, and the ODE.

Weaknesses:

No weaknesses noted.

Reader's Score: 5

Status: Submitted

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