

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

Status: Submitted

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Technical Review Coversheet

Applicant: WI Department of Public Instruction (U282A150002)

Reader #1: *****

	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	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	10
Dissemination of Information and Best Practices		
1. Dissemination	10	8
Oversight of Public Chartering Agencies		
1. Oversight of Authorizers	15	15
Management Plan and Theory of Action		
1. Management Plan	10	7
Project Design		
1. Project Design	10	10
Sub Total	80	70
Priority Questions		
Competitive Preference Priority		
High-Quality Authorizing and Monitoring Processes		
1. CPP 1	15	10
Sub Total	15	10
Competitive Preference Priority		
Authorizer other than LEA or Appeal Process		

1. CPP 2

	5	5
Sub Total	5	5
Total	120	103

Technical Review Form

Panel #11 - SEA Panel - 11: 84.282A

Reader #1: *****

Applicant: WI Department of Public Instruction (U282A150002)

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 objectives of the CSP are directly tied to the state superintendents goals. The state's goals focus directly on academic achievement and attainment. (p. e26) This is a sound way to ensure that the CSP activities are integrated. Funding equity is achieved through a variety of avenues. Charters established by local boards receive state school aid and participate in state grant programs. Independent charter schools receive state aid payments directly from DPI to cover operational and facility costs. Also, under Act 55 state funding for transportation costs for independent charter schools is included. Under state law all contracts must stipulate the amount to be paid for operations and facilities. There is also a guaranteed minimum amount of state aid for every student. (p. e27) It is clear Wisconsin has a comprehensive plan to ensure funding equity.

A task force has been created to identify best practices and it includes members from the best performing charters in the state. They then published their findings. This had led to increased collaboration. Subgrantees are required to meet annually to report and share their best practices with other schools. There is also a 3-day state wide conference where charters share their best practices. In Wisconsin there is a charter school option for parents almost everywhere, especially for students who would otherwise attend the lowest performing schools. The five new independent authorizers are a comprehensive way to provide parents with additional choice. (p. e27-29)

Weaknesses:

It is unclear how the transportation costs will be controlled which will have an impact on funding equity.

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:

Charter schools are provided flexibility on school calendars, curriculum, professional development, staffing and many others rules. By making them exempt from Chs. 115 to 121 the state is offering maximum flexibility. (p. e29)

Also all charters must be non-stock corporations which ensures the charter has complete separate legal existence from the authorizer. (p. e31) Finally, there are no caps on the number of charters. (p. e31)

The state uses a variety of communications including electronic, direct mailings and workshops and presentations to inform about funding (p. e31). Phone calls and visits by WCSP staff ensure that all funds are received in a timely fashion. (p. e32)

State law stipulates this compliance and compliance is evidenced by the ongoing receipt of federal aid tied to IDEA. DPI follows up on all complaints to ensure compliance. Their process is thorough and includes verification of any corrections. To receive funds subgrantees must sign off that they will comply with all of these laws.

Weaknesses:

No weakness found.

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:

There has been a clear reduction in the number and percentage of poor performing charters over the past five years (p. e36)

Last year the six schools with the highest accountability scores in the state were charter schools. Over the five year period charters served 23% more educationally disadvantaged students and still equaled the performance of non charter students. (p. e37)

Weaknesses:

There is not evidence of an increase in number of percentage of high quality charter schools. (p. e35)

Reader's Score: 7

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:

Authorizers are required to give priority in awarding charter contracts to schools serving educationally disadvantaged students. It is also clear charters serve a diverse student body when compared to the state overall. DPI provides additional targeted funds to high quality charters that serve populations of 50% or more educationally disadvantaged

students. Under the grant WCSP has performance measures tied directly to increasing achievement and closing achievement gaps for educationally disadvantaged students. The subgrant will provide additional funding to schools to support students at risk of not graduating. Also, dissemination of evidence based best practices to assist educationally disadvantaged students is a priority of WCSP, so rewards and recognition will be provided to schools who perform well in this regard. (p. e38-39)

Applicants are required to describe their process for ensuring equal access. DPI will withhold state aid to ensure compliance. DPI and WCSP staff provide direct assistance with compliance. (p. e39)

Grant applicants must describe the specific innovative practices they will use. These practices are shared at annual meetings and conferences. (p. e40)

Grants will not be funded if the data does not reflect compliance. Additional monitoring will occur on site. DPI has a discrimination appeal process and follows up on any related to charter schools. To date no appeals have been filed against charter schools. (p. e40-41)

Weaknesses:

The focus seems to be almost entirely on secondary schools. This largely ignores the achievement gaps at the elementary level.

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:

The WISE system, which covers: achievement and attainment, retention and discipline, can be accessed by multiple stakeholders as can the WISEdash public portal. The state report card has also been ranked top five in the nation. It was one of two top picks by parents. (p. e41)

The state has a variety of activities planned to create schools including: workshops for authorizers, charter start-up workshops and various technical support. They articulate how many high quality schools will be created. (p. e42-44).

In the past five years 91 schools have closed. WCPS has guidance on closing procedures. The state has a clear focus on closing charters that don't work, as evidenced by the number of closures. (p. e44-45)

Weaknesses:

No weakness found.

Reader's Score: 10

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:

DPI taps charters as part of task forces and workgroups to share best practices. Each subgrantee must collaborate with a statewide charter network that provides a framework for collaboration to support and develop program and professional development services for all schools across the state. It is clear the state has a comprehensive approach. (p. e45-46). The partnership between WCSP and the networks helps provide training and resources. Disseminators also work with networks to support other schools. There are services such as visitation days, biweekly conference calls and a free online community to share. (p. e46) There were 50 events where 70 documents were shared with over 300 school leaders in attendance.

DPI will use 10% of federal charter school grant funds for dissemination. Two of the four awards each year will be targeted towards secondary charters that demonstrate successful practices to improve student achievement for educationally disadvantaged students. (p. e47)

The process is comprehensive including a variety of initial communication methods about available grants. Applications are peer reviewed and the program is competitive with only 76% getting funded. WCSP is also raising the standards of dissemination grants to include clearly stated outcomes and specific practices. Subgrantees must attend an annual reporting session and report on best practices. (p. e48) Successful applicants are required to complete a series of activities including partnering with other charter schools, hosting visitation days and mentoring one planning subgrantee. (p. e48)

Weaknesses:

The applicant does not specify if best practices related to discipline and school climate will be shared.

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:

There are numerous authorizers in Wisconsin, especially considering the five new independent authorizers. Act 55 provides a comprehensive framework for ensuring charter school petitions that are approved have the capacity to become high quality. Upwards of 75% of charters meet or exceed expectations on state report cards and this is before the changes to Act 55 had taken place. (p. e49)

Authorizers must ensure every approved charter has procedures to achieve a balance that reflects the school district population. Applicants are required to have these elements incorporated in their applications. (p. e50).

All contracts must describe the specific methods they will use to measure the progress their students are making to meet the criteria of being a high quality charter school. (p. e50)

Monitoring includes numerous requirements and activities. These include annual performance reviews, annual compliance monitoring and annual public reporting. (p. e50)

It is clear the state and authorizers base renewal and revocation on student academic achievement. 90 schools have closed in the last five years for not meeting these expectations. (p. e50)

Annual reports reflecting academic and financial performance must be submitted to the state superintendent and the legislature. This submission is facilitated by the authorizers. Grant funds will not be released if these reports are not submitted on time. (p. e50)

Wisconsin schools have a wide autonomy based on exemptions from a variety of state education laws and requirements that they exist independently from any authorizers as their own non-stock corporations. (p. e51)
DPI has experience doing this as evidenced by their recent transition to the ACT and Smarter Balanced suite of assessments. They will assist authorizers and schools through any transition. DPI provides electronic communication and conferences to communicate changes. WISEdash is also a sound resource for accomplishing this. (p. e51)

Weaknesses:

None.

Reader's Score: 15

Selection Criteria - Management Plan and Theory of Action

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

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

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

3) The adequacy of the management plan to --

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

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

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

Strengths:

The logic model exhibits clear connections between the grant and improved educational outcomes for students. The activities clearly create outputs that lead to the short, medium and long term outcomes. All of these are focused on improving outcomes for students. (p. e64)

The performance measures clearly support the logic model. They lay out a number of measures that will lead to the desired outputs and eventually outcomes for students. (p. e56-63)

The state has recently received support from WestEd to enhance its ability to be successful in such a plan. The level of detail they have incorporated demonstrates a convincing dedication to appropriately manage the plan. (p. e65)

Weaknesses:

It is unclear how compliance issues would be addressed.

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:

There are five different subgrant applications. WestEd in their 2015 report found the DPI subgrant process to be comprehensive and meet all federal requirements. The process is clearly articulated and involves peer review. Wisconsin also has a solid estimate of how many subgrants it will issue on a year-by-year basis. (p. e66-69) Subgrantees are monitored by their authorizer and by WCSP. Constant and systematic feedback is provided. Subgrantees are reimbursed for eligible costs after the fact to monitor expenditures. Planning grants are awarded in two phases to protect funds. All subgrantees attend an annual reporting session to help monitor progress. 6 month progress reports must be written and submitted by every subgrantee. On site visits are conducted and external evaluation is contracted for. (p. e69-71).

The plan for creating a portfolio is comprehensive due to the volumes of data that the state collects and shares with its various data systems. Staff use the data to allow WCSP to identify best practices as well as low performing schools with problems. (p. e72)

Outreach about the subgrant program is accomplished by a variety of communications including electronic, mailings and workshops. (p. e72)

There is a description of the waivers and how they will further the objectives of the project. They include the need for

more time for more impact, flexibility around admin expenses so more can be spent in the first 2 years and allowing high performing schools to receive another dissemination grant. Clearly, all of these waiver requests will allow the program to have a stronger impact on students and none of the waiver requests would have a negative impact. (p. e73-74)

Weaknesses:

No weakness found.

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:

Every charter school contract will have to adhere to NACSA's authorizing principals. These include explicit details about what is required in terms of academic performance, operational expectations, financial expectations and expectations for equitable treatment of all students. (p. e22-23)

There are clear performance standards that include specified annual academic and operational goals that must be met annually. (p. e23) Clear criteria exist for renewal ad includes academic, organizational, financial and faithfulness to the

charter. (p. e21-22) The criteria for revoking a charter are clear and sound focusing on charters being faithful to their contract and effectively serving students. (p. e17) Authorizers report annually to the state legislature and state superintendent on each schools performance. (p. e24) There is an excellent differentiated review process that allows authorizers to open additional schools if all of their schools had one of the top two ratings. (p. e24)

Weaknesses:

It is unclear if authorizers must report the performance back to each school. There is mention of reporting to the state superintendent and to the legislature. No evidence of a final review immediately before schools open for their first operational year.

Reader's Score: 10

Competitive Preference Pritority - 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 state has a variety of authorizers and is adding five new authorizing entities. (p. e24-25)

Weaknesses:

No weakness found.

Reader's Score: 5

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Reader #2: *****

Applicant: WI Department of Public Instruction (U282A150002)

Questions

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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:

P e26 shows how the charter school program objectives are directly aligned with the overall public school education agenda known as Agenda 2017. Both seek to close achievement gaps and improve outcomes for educationally disadvantaged students and in career and college readiness. Both include the dissemination of best practices in education in order that they may be replicated throughout the state. The state also has specific measurable targets goals with benchmark levels to indicate the degree of expected increased performance included in its Agenda 2017 at certain grade levels. One goal that is not aligned between the two but may impact education across the state is the desire to strengthen authorizing practices for charter schools.

The Department of Education holds an annual three day best practice conference for charter schools where participants can collaborate and share data and other information about promising instructional practices. The application provides examples of best practices that have been highlighted in this state. It also states that network support and organizations will be created.

The DPI states that given the high number of charter schools and the fact that the geographical and residency requirements have been recently modified in the state regulations, there are a huge number of viable options for the students who attend a lower performing school.

Weaknesses:

The application explains two different ways charter schools are funded according to whether or not they are established by a local school board or an independent charter schools association. One big change that has been added under the Act 55 is the ability of charter schools to have state funding for transportation. This might eventually be a weakness given the statement that students have no geographical or residency restrictions as to where or to which school they can attend. p14.

The chart on e25 is unclear. The difference between allowed authorizers and actual authorizers needs to be explained relative to the state level strategy to expand the number of authorizers especially since there are only 101 actual authorized charter schools at this time. It appears that every LEA is allowed to be an authorizer but this is not explicitly stated in the information chart. It makes it easier for an entity to apply to become a charter school if the authorizers are so abundant.

Reader's Score: 11

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:

A number of major policies govern the development and proliferation of charter schools in the state. There is no cap on the number of charter schools that can be created in Wisconsin. There also appears to be no cap on the number of chartering authorities that are allowed in the state since ACT 55 intends to add 5 more authorizers. There are currently 433 entities that can authorize charter schools although not all of these authorizers have open charter schools. The chart on page e 25 indicates that the actual number of authorizers who have authorized charter schools is 101. Charter school authorizers can create charter schools anywhere in the state and residency requirements have been lifted for students. All of these policies reflect the state's ambition to increase charter school development in the state. e 29

According to the state statutes, Articles 115 through 121 of these statutes do not apply to charter schools. Charter

schools in the state are given extreme flexibility and autonomy that allows charter schools to opt out of regulations including those governing school calendars, curriculum, professional development, and staffing. If the charter is authorized by a school board, the application must also describe what waivers of the school district policy will be allowed.
e 30

Information about federal funds is conveyed in multiple ways including the state's agency-wide grants webpage, posting announcements, and direct mailings to eligible applicants, list serves, distribution lists workshops and presentations at grant funding opportunities. e 31

Weaknesses:

It is not clear what policies determine the expansion of charter school authorizers or allowable charter schools and how the expansion of charter schools relates to the overall state education plan.

The broad range of authorizers and exemptions for most school rules and regulations may challenge the Department of Education's ability to successfully provide technical assistance to all campuses to ensure that all students are achieving academic success on the nine measurements included in the state assessments.

Page 36 (or e 51) states that the Department of Public Instruction proposes to fund 4.55 full-time equivalent positions with this grant . It is what the DPI's policies are to support to the other charter schools that do not receive federal funds or to provide support to so many different chartering authorities if more of them select to develop charter schools in the future

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:

According to the information presented in the grant application on page 20, the percentage of high-quality charter schools has increased each year and now stands at 31.4%. 40% showed progress in closing gaps with subgroup students. 76.6% of charter schools' overall accountability rating was meets expectations.

Weaknesses:

According to the information presented in the grant application on page 20, around 30% of the charter schools still are not making progress. In addition, 91 charter schools have been closed in the last five years. These closures have an impact on increasing the percentage of high-quality schools.

On page 22 the application states that charter schools continued to perform comparably to regular public schools seems to indicate that children in traditional public schools were still performing a bit higher in the categories of mathematics and reading compared to those children in charter schools. The percentage of schools meeting or exceeding expectations still remains higher by 14 percentage points in traditional schools then in charter schools. However, the six scores with the highest accountability scores out of all public school in the state were school district authorized charter schools.

There is a difference between overall accountability and the accountability of addressing specific subgroups to ensure equity of achievement of all children. Subgroup accountability information would have revealed the extent each group has succeeded and in particular, the impact charter schools have on improving the academic achievement of the educationally disadvantaged.

A breakdown of how many individual campuses are designated as charter schools in the state has not been included. The National Association of Charter School Authorizers (NACSA) defines large authorizers as those authorizers who have 10 or more schools under their jurisdiction. When the information about the actual number of campus entities that are a part of a charter school is missing it is difficult to determine the level of success and implementation of charter schools and the number of students impacted as compared to the number of students that are in traditional public schools. This information could shed important insight on the performance of the charter schools relative to the traditional public schools in the state.

Information about high school graduation rates and college and career rate readiness were not included.

A break out of the success rates of the high school and the elementary schools would help understand the areas of strength in the past performance data.

Reader's Score: 5

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:

According to the data in the application 59% of the charter schools serve educationally disadvantaged children. The authorizers of charter schools are required to give priority in awarding charter school contracts to schools that serve children at risk as defined in the Wisconsin state statutes.

On page E1 60 of the application the funding formula is relative to student enrollment year in the grant cycle. Secondary charter schools will receive a higher amount per year in the grant cycle in educationally disadvantaged students grades six through 12 will receive additional funding be in those of the secondary charter school sixth of the population

Page 23 of the application states that the Department of Education will continue to provide additional targeted grant funds to high quality secondary schools that serve a population of 50% or more of educationally disadvantaged students in grades six through 12.

Dissemination of evidence and best practices to serve educationally disadvantaged students has been a stated priority for the Wisconsin Charter School program. Page 24 specific innovative practices that will be employed to improve student achievement gaps must be included as a part of the charter application. As addressed in other parts of the grant review, dissemination of information will take place through a variety of means.

The Wisconsin Charter School Program also conducts sight onsite visits and is required to make sure that they academic goals are met for the educationally disadvantaged. Data review includes assessment results suspensions and expulsions attendance drop outs and the achievement gap changes. Page 25

Weaknesses:

Page e36 states that out of the 110 Title I schools statewide, only 9% of them were charter schools. It is not clear as to why more Title I schools who are identified because of the educationally disadvantaged population have not adopted the charter school model as mean of increasing quality educational opportunities for students. Without pupil enrollment data on the number of educationally disadvantaged students in the whole state compared to the number being served by charter schools, it is difficult to determine what impact charter schools have on meeting the needs of these students across the whole state.

As stated earlier, there is no information about what happens to the educationally disadvantaged students if they were in attendance at one of the 91 charter schools that were closed. It is not clear how the needs of these students are served or what enrollment guidance is given to parents if a charter school is closed. The commitment to ensure the students are placed in a new educational setting is of particular importance to children who are already identified as educationally disadvantaged as it speaks to access issues that are a part of the federal regulations.

. Including information relative to tracking the placements of educationally disadvantaged students if their school is closes would help clarify how the achievement gap is closed for those students who were in attendance at one of the closed charter schools. If authorizers track this information it would allow them to make sure that no student falls through the cracks when charters are closed.

While funding increases are by policy going to be higher in high schools and in high schools with a high population of at risk students, the indicators that will be used to measure the effectiveness of the increased allocation on student success is unclear.

Reader's Score: 11

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 DPI states that its developed data collection tools will provide comprehensive school level data relative to the four academic priorities of: student achievement, student growth, closing gaps and on track post secondary readiness. The state superintendent must publish an annual report that includes student achievement data as well as data on retention, attendance, drop out and truancy, suspensions and expulsions, high school completion and post secondary plans. (e 17) The DPI developed a data collection system known as WISE (Wisconsin Information system For Education) that allows for the collection of information on enrollment, attendance, ACT and AP data.

The various changes in the Wisconsin education statutes that allow multiple charters in the same area include school choice in terms of being able to attend a charter school in any part of the state without residency requirements, the lifting of most school rules and regulations that apply to traditional schools and the fact that the state has approved 433 charter school authorizers are measures that support the state's vision for expanding charter schools. E 25. The rationale for expanding the number of authorizers is that there will be two choices in every geographical area and this will be possible when more than the number of actual authorizers who have opened charter schools (101 of them) increases. Approval of so many authorizers will make it easier for charter schools to open across the state.

The Department of Public Education cannot close charter schools in the states but it provides technical assistance to authorizers to try to ensure that all laws and regulations are followed relative to the closing of charter schools and for meeting state and federal regulations.

Weaknesses:

State statutes dictate many aspects of how an authorizer must set up high quality charter schools, ensuring that the design elements of the contract are in compliance with state and federal statutes and mandates, specific criteria for what data collection is required and submitting annual reports is included. However, it is unclear as to whom or what entity ensures that the authorizers throughout the state are in compliance with all the required state statutes relating to charter schools, including data collection and reporting. p.e49

Neither the state superintendent nor the Wisconsin Department of Education has the ability to close a charter school. It is not clear how or who or by what processes and criteria are used to remove an authorizer if the authorizer is not fulfilling its responsibilities that are identified in the state education statutes. It is not clear how the state grants authorizer status or what criteria are used.

Page e57, states that 132 new charter schools were authorized during the previous 6 year CSP grant cycle and that this is considered their baseline number for tracking growth during the next grant cycle. During this grant cycle, the goal is to open 100 additional charter schools. It might be difficult to give the real estimate of the number of high quality charter schools at the beginning and end of the project period since there are currently 433 entities that have the authority to open a charter school. Currently, only 101 authorizers have opened charter schools but it is not clear what would happen or what the strategic plan would be if the remaining 300 currently authorized entities decide to open charter schools during the next three years. In other words, it is not clear how the state arrived at the goal of opening 100 new charter schools given the number of approved authorizers in the state.

In terms of accountability, it is not clear how school level formative assessments (which are more closely aligned with local charter school's selected innovative practices) and instructional delivery, impact student achievement or how they are evaluated as a part of the charter school grant and the statewide vision for creating more high quality schools.

The State Superintendent of Public Instruction cannot close charter schools. (pe45) Only authorizers can close charter schools if they are not living up to contract agreements and state law requirements. It is not clear whether or not there have been any instances in the past where the department of education would like to close a charter school and the authorizers has kept it open. There is the potential for this to happen in the future given the fact that there are over 433 approved authorizers in the state even though there are only 101 active charter authorizers at this time.

Page e 17 states 50% of the closed charter schools were in the bottom half of the academic performance categories in the state in reading and math. The process to close charter schools is important to understand as these closures ultimately affect all public school children and impact whether or not the state is meeting the goals in the overall state education plan. In particular, as an aspect of accountability, it would be helpful to understand what provisions the state makes to ensure that students are enrolled in a better school if the charter school is closed for underperformance. The Wisconsin Department of Public Instruction' Charter School Planning Sub-grant Application Reviewer Benchmarks does not include benchmarks for how the collection and analysis of data on subgroups will be a part of the charter school process (e 136). However, p e41 states that the information is collected in the state's Wisconsin Information System for Educators.

Reader's Score: 6

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 Department of public instruction has talked about its various means of disseminating information and provides examples of dissemination activities that have taken place through conferences school visits and outreach coaching. The application points out that over 50 events across the state were convened for the purpose of sharing charter school practices and that more than 70 documents relative to best practice were produced. (p e 47)

The Department of Education will use up to 10% of its grants for the purposes of increasing dissemination of promising practices of charter schools with the least three years of successful operation. It will also provide dissemination funds available to charter schools and the department estimates that 150 Wisconsin charter schools may be eligible to apply for dissemination funds. The state recently refined its dissemination grant application to include data that support the applicant's best practices and specific actions they will take to measure the success of the best practices.

E 45 states that the DPI has a commitment to disseminating best practices that include strategies related to student discipline and school climate through convening a task force to collect this information.

Weaknesses:

Page e 45 states that the DPI commissioned a task force to identify classroom centered best practices but it is not clear what specifically this commission or other work groups will do collect, analyze and disseminate information about student discipline and school climate. Collecting this information could lead to an in-depth discussion about what is effective and what is non-effective in this area and other schools across the state may want to adopt the more successful measures.

It is not clear how the state intends to evaluate whether the dissemination activities lead to the increase of high quality charter schools. It is not clear how the SEA will use measures of efficacy and data to identify best practices and assessing the impact of its dissemination activities. It would be important for the state's evaluation of the dissemination plan to align with the elements in the sub grant application. This would aid the state in their discussions with authorizers about the most promising practices statewide. It would also assist the state in determining whether or not revisions need to be made in future sub grant competitions.

It is not clear if there is any data tracking charter schools making changes in their curriculum or instructional plan based upon what they have heard or read from the multiple avenues of dissemination of best practices. While this information may be more qualitative in nature, it would aid in expanding networks of schools using the same best practices and allow successful schools to provide insights to other schools that may want to adopt their instructional model. The dissemination plan could be strengthened in this area.

There is no specific information about the nature of the professional development that would assist teachers and administrators in creating and sustaining a quality school that has the greatest likelihood of increasing student achievement. Given the fact that charter schools can select their own innovative instructional model it would be important to know how the state can provide technical assistance though professional development activities.

Reader's Score: 7

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 applicant states that changes in the state's education laws under Act 55 means that all authorizers are required to approve only high quality schools. The Charter Schools office of the Department of Public Instruction provides guidance to authorizers about what constitutes a high quality charter school and as developed criteria to support this definition. E49

Although authorizers make the decision about opening a new charter school, the Department of Public Instruction has created a contract reviewer benchmark document that authorizers can use. The contract renewal benchmarks are aligned to and reference state education laws.

The authorizers and the local school board for the charter have accountability responsibilities but the Wisconsin Department of Public Instruction also has major responsibilities to support the creation and development of high-quality schools through reviewing specifically identified key objectives for the program grant when it does an onsite review.

According to the Wisconsin laws, only authorizers can revoke charter schools in the state. Therefore, the bulk of the responsibility for oversight is not with the state education agency but with those entities the state has approved to authorize the establishment of charter schools. The state can provide technical assistance, online training and develop guidance documents to assist the authorizers in a number of areas.

The DPI and the Department of Charter Schools Program can provide oversight and monitoring in relation to the awarding

of the federal charter schools program sub grants but the rest of the responsibilities for maintaining the charter school contracts are in the domain of the authorizers and the local charter school boards. Therefore, the SEA has a greater deal of power of oversight and the ability to hold a charter school accountable if it receives the federal grant funds. e 69-73.

Performance measure 4 b on e 62 states that WCSP staff will assist authorizers in strengthening their authorizing practices including greater adherence to the NACSA standards by providing technical assistance in the form of workshops, online training and guidance documents on authorizing standards and principles. The SEA also provides technical assistance to the authorizers about best practices in monitoring programs.

The primary responsibility for monitoring charter schools lies with the authorizer. However, the WCSP staff reviews every charter school contract to verify compliance with state and federal law using specific contract benchmarks. Amendments must be submitted to the WCSP staff if required provisions are missing. Annual reports submitted by the charter schools are reviewed by the CSP staff. E16. The DPI assists the authorizers in evaluating academic performance through the creation of various data dash boards such as the WISE Dash board mentioned previously.

Under authorizing standards of the National Association of Charter School authorizers, authorizers are to implement a comprehensive performance and accountability monitoring system. In addition, state education law spells out requirements for the participation in statewide assessments.

Authorizers make decisions about charter renewals and revocation of its charters schools. According to state statutes and the agreed upon contract between the authorizer and the charter school applicant these decisions must be made based on established measurable academic and operational performance expectations. Charter schools must submit annual reports in the Department of Education and include all achievement data collected by the state in their data collection portal. The state assists the authorizers by providing various mechanisms for the collection and reporting data on increases in academic achievement in charter schools and the authorizer has the ability to close charter schools due to a lack of growth on a variety of measures. The DPI encourages the authorizers to use these data sources as they make the decisions as to whether or not a charter school should be closed.

State education law identifies numerous provisions of flexibility for supporting charter school autonomy while also stating charter school reporting and accountability requirements. e 23.

The Department of Public Instruction works directly with the authorizers during times of transitions such as the changes in the statewide assessment system. e 51

Weaknesses:

Neither the state superintendent nor the Department of Public Instruction has the legal authority under state law to authorize charter schools or to revoke charter schools. e 25. Both of these actions are under the domain of the various charter school authorizers. Education Acts such as Act 55 determine the number of authorizers of charter schools in the state and the types of allowable authorizers. The bulk of the responsibility therefore for oversight is not with the state education agency but with those entities the state has approved to authorize the establishment of charter schools. Authorizers make decisions about charter renewals and revocation of its charters schools. According to the contract, these decisions should be made based on establishing measurable academic and operational performance expectations. Because of these provisions, the DPI can only provide soft accountability measures such as providing technical assistance to the authorizers and reviewing the legally required annual reports. It is not clear what responsibilities, actions or firmer accountability measures the state education agency can actually take based on the findings from their onsite review if they find that the authorizer is not adhering to the expectations and responsibilities laid out for all charter schools. It appears that the state education agency can provide guidance and technical assistance but has limited ability to actually resolve any differences with authorized charter school authorizers.

The Charter School Contract Reviewer Benchmark document does not contain any language relative to the expectation that the charter school incorporates evidence based model and practices. E115-118. In addition, the application for the federal planning grant funds, the planning grant reviewer benchmarks, implementation grants, and implementation grant reviewer benchmarks documents do not mention the need to explain the evidence and research that supports the selected educational model.

Reader's Score: 9

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 Department of Education has included a comprehensive management plan in this application many of the performance measures are listed as SMART goals that include expected percentiles related to the expected increases in the achievement.

The Department of Instruction will contract with an external evaluator to conduct an evaluation of this grant during its first year. Sub grant timelines and activities are also clearly identified.

A number of different Wisconsin Department of Education teams provide support for the charter school program

including: the office of educational accountability, office of student assessment, the data warehouse and decision support, school management services, school financial services, teacher education, professional development and licensing, special education, Title I and school support and legal services. Support from various other departments within the Department of Education is critical to achieve all the objectives of the grant listed given the fact that the grant proposes to fund only 4.55 full-time equivalent positions for the state's charter school grant program.

The applicant plans to hold at least two workshops and technical assistance for authorizers on NASCA's Principles and Standards for Authorizing. e 55. This reflects the DPI's intention of encouraging authorizers to use high quality standards.

Performance measures that support the logic model are found in the comprehensive management plan listed on pages e 52 through e 63.

Weaknesses:

Activity 5 in the management plan calls for the evaluation of the effectiveness of the CSP for charter school operators and authorizers in opening new quality charter schools but no indicators that will be used to evaluate the effectiveness have been identified. e 53

Stated Activities 4, 5 and 6 in the management plan focuses on improving and highlighting the success of charter schools at the high school level but no specific measures that are specifically related to the high school level are identified.

The specific performance measures that are linked to the logic model and are identified as a part of the evaluation plan do not address specific academic achievement other than in grades 4 and 8. There are no performance measures relative to evaluating the efficacy of the different innovative practices and selected charter school curricula.

There is nothing in the management plan about how parents and other stakeholders will be informed of the charter school opportunities or reporting about best practices in charters schools in their school district.

Reader's Score: 8

Selection Criteria - Project Design

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

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

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

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

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

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

2) The process for monitoring CSP subgrantees;

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

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

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

Strengths:

The Wisconsin Charter School Program has developed separate sub grant applications for the following purposes: planning and program design, initial implementation, implementation renewal, dissemination, and dissemination renewal. This State Superintendent of the Department of Public Instruction has the final approval of all grant awards.

The sub grant application process is clearly presented in this application. The process includes having external applicant evaluators. Having expert external evaluators helps to ensure that the awarding of sub grants are based on the same specific criteria.

The Department of Education's goal is to create 100 more charter schools during this grant cycle and it provides a breakdown of the projected growth of Wisconsin charter schools during the grant. 103 planning grants will be given, 100 new charter school implementation grants will be awarded, and 89 implementation renewal grants.

It is through the specific requirements identified in the sub-grants that the DPI and the CSP department can ensure high quality charter schools are being developed and information about them are being disseminated. It is through the sub grant process that the DPI can monitor the awardees for compliance with all state and federal requirements relative to the development and implementation of a high quality charter school.

Weaknesses:

The design plan is very strong in terms of monitoring and technical assistance for those charter schools that receive a sub grant award but it is unclear as to what the design plan is for those charter schools that do not receive a sub grant award. The DPI CSP still has a responsibility to address the goals of all charter schools in the state as they continue to work towards excellence. The WSCP can create portfolios of subgrantees that focus on areas of need but it is not clearly articulate what actions are taken to assist these charter schools. e 72.

It is not clear how the percentage of eligible applicants that were awarded previous CSP grants relates to the overall quality of the applicant pool.

It is not clear what final review process occurs prior to the opening of a new charter school.

Reader's Score: 8

Priority Questions

Competitive Preference Priority - High-Quality Authorizing and Monitoring Processes

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

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

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

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

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

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

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

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

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

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

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

Strengths:

Pages 7 and 8 of the application list the performance expectations and Wisconsin state law contract requirements relative to academic performance expectation, operational expectations, financial management expectations, and equitable treatment of all students and applicants. Performance objectives for each school are expected to be aligned with the objectives that are identified in the charter school contract. In addition, the governing boards of the charter schools are also required to identify actions they will take if the charter school fails to meet performance standards identified in the contract.

The Wisconsin Charter School Program (WCSP) is an administrative office that is part of the Department of Public Instruction (DPI). It reviews contracts to verify compliance with state and federal requirements.

According to Wisconsin state statutes, charter school authorizers have statutory authority to take action in terms of revoking the charter school at any time for the following reasons: violating the school contract, insufficient progress made in meeting the educational goals, fiscal mismanagement or violation of provisions of the charter law.

State law does not authorize the State Superintendent of Public Instruction to close schools but the Wisconsin Charter School Program will support authorizers when they are the ones that close academically poor performing charter schools. Wisconsin takes the review of charter schools seriously and in the last five years it has closed 91 charter schools.

Page 1 of coordinating to the provisions in the 2015 2017 budget act known as Act 55 requires authorizers to conduct an annual evaluation as to whether the charter schools meet the terms of the contract and to report the academic and financial performance for charter schools to the State Superintendent and state legislature. State law requires an annual programmatic and fiscal audit of each charter school based upon using contract benchmarks. The Wisconsin Charter School Program staff at the DPI reviews every contract and will provide technical assistance as a result of any audit findings.

Weaknesses:

It is not clear how charter school authorizers who do not receive these grant funds will sustain their program independently of these federal funds or whether or not the state will provide additional funds for those charter authorizers in charter schools not receiving these federal grant funds.

91 charter schools have been closed in Wisconsin. 70 of these closures were based on an extensive data review. No information about what support services are provided for children in these schools once the charter is revoked or what happens to all these children in terms of enrollment in other schools that have the likelihood of increasing student achievement has been provided. It is not clear how the performance objectives relative to these students will be met.

There is nothing mentioned in the project designed or throughout the whole SEA application about how to improve teacher quality other than to disseminate best practices. There is no specific information about the nature of the professional development that would assist teachers and administrators in creating and sustaining a quality school and therefore improve student achievement at all grade levels.

It is not clear what the final review process is that occurs prior to the opening of a new charter school, therefore a multi-tiered clearance process is not evident

Reader's Score: 11

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 state law provides for two types of authorizers: a school board or a non-school board independent authorizer including institutions of higher education and certain local governments. Page 10 states that there are 424 local school boards that can serve as authorizers of charter schools, three universities, one city government, tribal colleges, 2 community college districts and one county government but only 110 charter schools have been created. That means there is a potential for additional authorizers to open many more charter schools in the future.

Weaknesses:

None noted

Reader's Score: 5

Status: Submitted

Last Updated: 08/06/2015 09:22 AM

Status: Submitted

Last Updated: 08/05/2015 11:53 AM

Technical Review Coversheet

Applicant: WI Department of Public Instruction (U282A150002)

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	8
Quality of Plan to Support Ed. Dis. Students		
1. Ed. Dis. Students	15	13
Vision for Growth and Accountability		
1. Growth and Accountability	10	10
Dissemination of Information and Best Practices		
1. Dissemination	10	8
Oversight of Public Chartering Agencies		
1. Oversight of Authorizers	15	14
Management Plan and Theory of Action		
1. Management Plan	10	10
Project Design		
1. Project Design	10	10
Sub Total	80	73
Priority Questions		
Competitive Preference Priority		
High-Quality Authorizing and Monitoring Processes		
1. CPP 1	15	15
Sub Total	15	15
Competitive Preference Priority		
Authorizer other than LEA or Appeal Process		

1. CPP 2

	5	5
Sub Total	5	5
Total	120	111

Technical Review Form

Panel #11 - SEA Panel - 11: 84.282A

Reader #3: *****

Applicant: WI Department of Public Instruction (U282A150002)

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:

Wisconsin is taking direct measures to make sure that charter schools will improve educational outcomes for all students, as evidenced by the new accountability measures that have been put in place back in 2011-12. As part of the Wisconsin ESEA Waiver, they have replaced the old AYP system with the new Accountability Index. With the new Accountability Index, DPI report cards place all schools into one of five categories ranging from "Fails to meet expectations to exceeds expectations, centralizing one form of evaluation for all schools, traditional public and charter. The state Sup has listed 5 goals for improving education outcomes by the year 2017, and charter school integration is one of them.(page e-26) Evidence would indicate that all five of these goals by the State Superintendent can tied to charter school development (e-26).

There is evidence that a substantial amount of autonomy exists within the Wisconsin charter schools in reference to autonomy over budget, staffing, procurement and curriculum. Evidence has been shown that developers and authorizers are free to establish contracts freeing them from any local policies necessary to ensure autonomy (e-30). Included within this contract with the WCSP, are assurances of those levels of autonomy (e-30).

Evidence shows over the last six years, that DPI has collaborated and assisted in the creation of 132 charters in the last six years, sharing many of these best practices. One method to assure this is the funding equity incorporated into state level strategy for all schools in Wisconsin, as listed in the state superintendent's Agenda 2017. Charters receive state and local funding to assist with costs incurred for facilities, special education and transportation costs. This is also evident by the development of the Fair Funding for our Future Plan, which includes a guaranteed minimum amount of state aid for

every student, and including a “poverty factor” into the funding factor as well.

The leveraging of statewide reform is evident with all the strategies listed on pages e-28-29. Equally as important is the strong evidence of sharing these strategies and best practices, as Wisconsin has commissioned a task force of Wisconsin educators to identify classroom-centered practices to address closing Wisconsin’s achievement gap, as demonstrated on the chart on page (e-28). Importance has also been placed on the collaboration of these charters, as evidenced by the requirement of all sub-grantees to meet at least annually to report and share best practices.

Evidence exists that the state hopes to make Charter schools are available in almost every area of the state, as evidenced by the growing number of charters open throughout the entire state, using these charters to improve educational outcomes and close the achievement gap (e-29). With so many charters spread throughout the entire state, the state has agreed to identify and publish findings for all charters.

Weaknesses:

They make it evident in the petition that charter schools are a vital part of Wisconsin's state-level strategy, and list the goals they hope to attain (e-26). However, the question that needs to be addressed is the question of how Wisconsin will be able to handle the opening of so many new charter schools. With this high number of charters that have the ability to open at any location within the state, there is no evidence presented to indicate how the transportation costs will be accounted for(e-27)?

Along with this option of any school any where within the state of Wisconsin for charter options, questions arose that were inadequately addressed within the petition. Other unanswered questions that were brought up in the petition and need to be explained were why a charter school would need more than one location, and if they had more than one location, how were authorizers going to sufficiently monitor multiple locations. It was not clarified as to how the authorizer would provide technical assistance to all the schools.

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:

Reasonable evidence exists to prove that Wisconsin charter school law provides great flexibility for authorizers and developers. Under law 118.40(7)(b), charter schools are exempt from the educational laws that bind traditional schools and districts. The DPI has created rules and regulations specifically for charter schools in Wisconsin (e-29), allowing charters to opt out of other regulated items for traditional public schools. In fact, extensive evidence exists that many of these opt outs are included in some of Wisconsin's charter contracts (e-30). Further evidence is presented by the fact that beginning in the 2013-14 school year, all charters will become non-stock corporations under Wisconsin law (e-30).

Federal award amounts are automatically entered into the states federal grant application system, insuring each state is aware of its' share of federal funds in a timely fashion. Wisconsin has set forth a comprehensive manner in which charters must submit a copy of the schools; corporation papers with grant applications, ensuring the board has a separate legal existence from the authorizer(e-32)

All funds go through the DPI, this ensures disbursement on time, along with workshops on this for all school entities as well. They also have procedures for complaints regarding funding issues as well. (e-32) Compliance for IDEA is required of all LEAs in reference to charters in Wisconsin, as evidenced by the fact that under Wisconsin Law 115.775(1), operators of independent charters are considered independent LEAs for education purposes. Wisconsin also maintains an agency wide grants page to inform charter schools about federal funding, including deadlines for all eligible applicants. Evidence indicates the DPI provides comprehensive workshops and trainings for all independent charters around the topic of federal fund disbursement.

Weaknesses:

no weaknesses identified for any factors.

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:

Wisconsin has traditionally served a large proportion of “at risk” youths, as documented by the number of 51 public schools serving at risk youth in Wisconsin, with 30% of those being charter schools. As evidenced by the chart on page e-34, charter schools in Wisconsin serve a much higher portion of the educationally disadvantaged population, with approximately 38.9% of them demonstrating the ability to close the achievement gap as well.

Wisconsin did provide evidence in their APR to the USDA, that the WCSP is contributing to a decrease in the number of low performing charter schools (e-36), as well as an increase in the number of high quality schools (e-37).

Evidence indicates that in 2011-12 school year, approximately 38.9% of the charter schools demonstrated progress in closing the gap, with that number increasing to 38.9 by the 2013-14 school year (e-35). Wisconsin also scores at or above the expectations regarding accountability goals and outcomes for the state. Proof of the success of the Wisconsin charters is exhibited in the fact that of the 243 charters in the state in 2014-15, only four were consistently poor performing, with only 12% of Wisconsin charters falling in the bottom 5% in reading, compared to the 20% in 2007-08, with math coming in at 13.5%.

The data on page e-35 demonstrates the positive trend charters have taken in the last three years of the current CSP grant, with evidence indicating that charters had shown progress in closing the achievement gap with consistency from the 2009-10 school year, all the way up and through the 2013-14 school year. Evidence also indicated that of all the schools within the State of Wisconsin that had demonstrated the ability to significantly close the achievement gap, 6 of those schools with highest percentage of closing that gap were charter schools.

Weaknesses:

Wisconsin did indicate that there was conclusive data proving they were moving towards closing the achievement gap. That fact was not supported by the data chart on page (e-35). The data present on page (3-35) was inconclusive and difficult to delineate.

Reader's Score: 8

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

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:

Evidence here supports the claim to help disadvantaged students in Wisconsin with Act 55. (e-37), along with awarding charter contracts to schools that serve at risk children, as evidenced by the chart on (page e-38). This clearly demonstrates that with this grant, Wisconsin will continue to serve over 50% of educationally disadvantaged students in grades 6-12 (e-38). WCSP also has performance measures tied in directly to student achievement. Wisconsin charter school data also demonstrates charters serve a diverse student body.

There is evidence that Wisconsin does intend to target educationally disadvantaged students, with the fact that all authorizers are required to approve only high quality applications that promote diversity. Wisconsin are required to award priority to charter school contracts that serve at-risk children, many of which fall within the federal definition of educationally disadvantaged.

The Wisconsin charter school program at the DPI reviews every charter application to assure compliance with State and Federal law. (e-16) The applicant states that the implementation renewal and dissemination renewal grants will not be funded if improved achievement for all students, including educationally disadvantaged students, is not demonstrated in the renewal subgrant application (e-40).

Weaknesses:

Under this grant, DPI will continue providing support for high quality charter schools serving educationally disadvantaged students? There is no evidence to indicate if those current grant funds are only for middle schools and high schools or if any of that money will be targeted towards elementary schools as well. This section becomes difficult to evaluate since there is only evidence to indicate middle and high school involvement, no reference to any elementary schools targeted. The only mention of elementary schools is evident on page (e-60).

While they do indicate that improving outcomes for educationally disadvantaged students is a major focus for the state's charter schools, and performance target measures will be directly increasing student achievement and closing the gap, the evidence provided so far is minimal.

While there are multiple mentions of "innovations" throughout the proposal, there is no evidence found with Wisconsin demonstrating what those innovative practices are or how they might be shared throughout the state.

While there is a plan in place for Wisconsin to monitor and ensure compliance for charter schools throughout the state, there does not appear to be appropriate amounts of staff allocated to meet this compliance issue.

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:

Recent changes to Wisconsin charter school law (July 2015) related to the expansion of independent authorizers, increased charter school accountability and authorizer oversight, which will further strengthen the charter school program. Since 1993, the state has steadily increased its number of charter schools with over 47,000 students attending Wisconsin's 243 charter schools in the 2014-15 school year. Wisconsin's data system has the capability to track student academic achievement, high school graduation rates, an post secondary education enrollment rates, as well as their retention discipline. They are able to disaggregate by sub-group (e-41).

They also have their own data system called WISE (Wisconsin Information System for Education), which allows them multiple tools to support data collection. E-41, all a part of Wisconsin's report card, known as one of the five best in the nation. E-41 (see Appendix H)

Wisconsin's robust system allows them to collect, analyze, track and report data on all charter school performance (e-41), allowing them to make sure high quality charters are maintained to acceptable levels, while at the same time enables the state to track data on academic performance within all sub-groups (e-41). The WCSP will support the creation and development of these high-quality schools and programs (e-41). Program objectives and key activities can be found in the tables on pages (e-42-43).

DPI has been commended in national publications for statewide efforts to close low performing

charter schools. (See the National Alliance for Public Charter Schools, February 2014 Estimated Number of Public Charter Schools and Students, 2013-14.) From 2009-10 to 2013-14, 91 charter schools have closed.(e-17 with chart on page e-18)

WCSP intends to increase the number of high quality charter school by 35% over the course of the next grant period(5 years) e-44, as evidenced by the number of contractual renewals. Wisconsin law does not authorize the state superintendent to close schools, but WCSP will support authorizer efforts to close academically poor-performing charter schools, as evidenced by the reported closure of 91 schools over the past 5 years.

Weaknesses:

With some many charters authorized throughout the entire state of Wisconsin, some clarity is needed to demonstrate what process and procedures are already in place to remove an authorizer.

Reader's Score: 10

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:

Evidence shows that Wisconsin has multiple ways to disseminate their best practices such as conferences, outreach coaching, task forces and even shared documents.

There is also evidence here to indicate that 115 eligible charters applied for funds, enhancing collaboration opportunities for Wisconsin charters.

DPI has developed a dash board (WISEdash), to publicly share all school data and report cards. They look for these best practices to be shared as part of task forces, work groups and agency work. (e-45), as exemplified by the superintendent's task force to identify best classroom practices. (e-45) They will also be called upon to collaborate with statewide charter network for professional development.

This dissemination plan has the potential to be innovative and effective. One reason for this is that it has been mandated they must collaborate with a statewide charter network that provides a framework for collaboration. There are three statewide networks that Wisconsin schools collaborate with (e-46), thus opening up the doors to a greater number of charter schools in the Wisconsin area.

Three groups are called upon to work with: Innovative Schools Network (ISN), Wisconsin Green Schools Network and Wisconsin Montessori Association. Documentation here suggests the partnership here will foster the dissemination of these practices. The table on page e-47 provides a brief snapshot of this effort. These networks work to collaborate PD, training, resources and guidance.

Adequate funding is proposed, with approximately 10% of the grant money to be used for this dissemination of promising practices professional development. Evidence suggests that at least two secondary schools will be funded with this money, but also hints at the possibility of two elementary school receiving funding. Evidence would suggest that with only 76% of sub-grants funded the last six years, it takes strong evidence of to validate a charter is meeting their 4 suggested criteria (e-48), in order to receive funding.

Weaknesses:

While claims are made that the Wisconsin dissemination plan includes clever, creative and innovative thinking, there is very little evidence to demonstrate what the plan is an how it will be implemented.

While there does appear to be multiple avenues in which to disseminate the information and substantiate the research, there is still very little evidence supporting the fact that their outreach does reach into neighborhoods that would attract disadvantaged students of various racial and ethnic backgrounds.

No evidence of addressing in the petition.

While there is reference to promising practices, there is no evidence as to that those promising practices are, and how they will be implemented. The mention was made her for only the first or second time about elementary schools. There is uncertainty as to whether the plan here is to include only secondary schools or to now bring elementary schools into the mix.

Reader's Score: 8

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:

Wisconsin law allows for multiple authorizers of charter schools (e-49). There is evidence of this working, as supported by the fact that 75% of Wisconsin's 242 charters are currently meeting or exceeding expectations in 2013-14. (e-49). This growth also includes evidence demonstrating 5 new independent authorizers.

According to Act 55, evidence must exist to show that all authorizers must achieve racial and ethnic balance. Authorizers must show which educational models they plan to use, and how that model will reduce the achievement gap. They must also demonstrate the ability to educate educationally disadvantaged students, with evidence and clearly defined examples.

not identified

There is proof her of annual performance and compliance monitoring, along with public reporting as stated in NACSA's authorizing principles (e-22)

The state must present evidence that it is monitoring the progress of these charters, indicating under 118.40(5)(b), giving the state to revoke a schools charter if the school fails to make certain sufficient progress attaining educational goals. A comprehensive accountability index has replaced the AYP that existed previously. This index ranges from Significantly Exceeds to Fails to Meet. (e-20) The range determines the level of support a school receives. According to the data, in the school year 2013-14, 75% of charter schools received a rating of Meets, exceeds or significantly exceeds expectations.

Evidence of multiple public reports are available for authorizers to publicize. Each authorizer is mandated to report to not only the state superintendent, but to the legislature as well (e-50). These reports will detail both financial as well as academic performance. If reports are not submitted on time, funds will be withheld.

Evidence exists that DPI has extensive experience in this area, having just modified the Wisconsin State accountability system while transition over to the Smarter Balanced assessments. DPI provides electronic communication and conferences to disseminate this information.

Weaknesses:

In Wisconsin, neither the state superintendent nor the DPI has the power to revoke charter schools, leaving Act 55 as the only assurance for high quality charter schools. The state does provide for a minimal level of oversight by allowing the state to base this compliance by following the guidelines set forth in the Act (e-50). The Act also mentions that the sponsor has the "duty" to monitor, but does not provide evidence of how this might be accomplished.

This did not appear to be addressed within the proposal. There were no measurable academic and operational performance expectations found.

no factors identified for 2-8

Reader's Score: 14

Selection Criteria - Management Plan and Theory of Action

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

considers the following factors:

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

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

3) The adequacy of the management plan to --

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

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

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

Strengths:

They did demonstrate a very thorough evaluation plan, with examples of clear connections between grant and short and long term outcomes, as well as increasing authorizer accountability. Each includes achievable measures towards that goal (e-56-58).

Evidence of a detailed evaluation plan will help measure performance on a short term, medium term and long term basis. E-56,

Monitoring and compliance will be helped along by WestED. E-64 Complete for pages e-52-64
Level of detail is also demonstrated on page e-65.

Weaknesses:

no weaknesses identified for any factors.

Reader's Score: 10

Selection Criteria - Project Design

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:

Very thorough process as evidenced by the sample applications in Appendix G, designed to ensure high quality schools, which exhibits a high quality plan and explains how these objectives will be met. Workshops are also run to increase the development of authorizers. The demonstrated 5 different sub-grant applications would be made available, partnering with an outside agency (WestEd).

The applicant does provide evidence that the State plans on the use of an external review process (e-51-52). The applicant plans on using charter developers, board members, operators and authorizers, to set benchmark criteria to determine best qualifiers. Adherence to a strict timeline establishes a calendar for grant awardees to follow, with evidence of all being monitored by the authorizer as well as outside entities.

Evidence indicates that the monitoring report for sub-grantees is comprehensive and meets all the requirements and assurances required by Federal statute (e-65). There are five different sub-grant applications required by federal law in Wisconsin, that must be met (e-65). (See Appendix G) These sub-grant applications are designed to ensure high quality schools. These sub-grants require the charter school to include in their portfolio:

vision - and research to support that vision

governance

planning process

how they plan to close the achievement gap in the community - addressing needs of educationally disadvantaged students (e-65-66)

Outreach is accomplished by variety of communications – e-73-74. Some of the methods of outreach include public announcements, WCSP webpage and grant workshops (e-72).

None identified

Weaknesses:

none identified

Reader's Score: 10

Priority Questions

Competitive Preference Priority - High-Quality Authorizing and Monitoring Processes

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

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

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

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

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

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

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

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

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

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

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

Strengths:

The applicant does present evidence that indicates the State of Wisconsin would like to see every child graduate with the skills needed to succeed in college and career. To that end, the state of Wisconsin is committed to developing high-quality charter schools to promote innovation to ensure that. Law changes in Act 55 have resulted in immediate changes to strengthen the authorizing and monitoring process of charters in Wisconsin, with all of them adhering to NACSA. See requirements in Appendix F for table. (e-22) All of these requirements and provisions must be reported to the charter governing board, with evidence of methods to be used to measure progress.

The state of Wisconsin, the WCSP and the DPI have made it clear they will revoke charters if not performing up to standard set forth in local and state documentation. The state of Wisconsin has been nationally commended for closing down those charters with low academic performances, (e-17) as evidenced by the closing of 91 charters not performing to acceptable levels in academics, financial concerns, and low enrollments. See data table on page (e-18). The state, the WCSP and the DPI review each and every charter, seeking out evidence of both academic and financial performance.

Wisconsin has demonstrated a unique differentiated review process for charter petitions. For this process, Wisconsin allows independent authorizers to open additional charter schools regardless of the terms of the existing contract, if all the evidence indicates that the authorizer's charter schools received one of the top two ratings on the most recent school accountability report (e-24)

Weaknesses:

none identified

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:

Evidence shows that Wisconsin law allows for multiple authorizers of charter schools, whether it be schools boards, universities or even local authorities, with Act 55 allowing for new entities to authorize independent charters, ensuring that every charter school developer has at least 2 authorizer options. Potential authorizers listed on page (e-25), also exhibit an appeals process available under Wisconsin state law (page e-25)

Weaknesses:

none identified

Reader's Score: 5

Status: Submitted

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