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

Applicant: Arizona Department of Education (U282A180003)
Reader #1: ********

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**Priority Questions**

**Competitive Preference Priority 2**

Equitable Financing

1. Equitable Financing                          | 6               | 6             |

Sub Total                                      | 6               | 6             |

**Competitive Preference Priority 3**

Charter School Facilities

1. Charter School Facilities                   | 6               | 5             |

Sub Total                                      | 6               | 5             |

**Competitive Preference Priority 4**

Best Practices to Improve Struggling School/LEAs

1. Struggling Schools                          | 3               | 2             |

Sub Total                                      | 3               | 2             |

**Competitive Preference Priority 5**

Serving At-Risk Students
1. At-Risk Students
    |   |   |
    | 3 | 2 |

  Sub Total | 3 | 2 |

Competitive Preference Priority 6

Best Practices for Charter School Authorizing

1. Best Practices
    |   |   |
    | 5 | 4 |

  Sub Total | 5 | 4 |

  Total    | 123 | 91 |
Technical Review Form

Panel #8 - Panel 8 - Arizona - 1: 84.282A

Reader #1: **********
Applicant: Arizona Department of Education (U282A180003)

Questions

Selection Criteria - Quality of Project Design

1. The Secretary considers the quality of the design of the proposed project. In determining the quality of the design of the proposed project, the Secretary considers:

Reader's Score: 12

Sub Question

1. (1) The extent to which the proposed project demonstrates a rationale

Strengths:
The application demonstrates a strong need to improve outcomes for Arizona's disadvantaged students. For example, the data provided on p. e47 show that only 28% of economically disadvantaged students were proficient on the 2017 AzMERIT English Language Arts exam, and the same figure was only 3% for Limited English Proficient students. A key proposal in the application is to increase disadvantaged students' outcomes by opening 40 charters, which seems appropriate given the track-record of Arizona charters in serving disadvantaged students as illustrated by the data provided on pp. e47-e49. Overall, there is a clear and compelling rationale.

Weaknesses:
Although it is clear that Arizona's populations of disadvantaged students are not performing at a high-level (pp. e47-e49), data that compares their performance to non-disadvantaged students are not provided. Similarly, the application did not provide information that conveys the extent to which the current supply of charters is oversubscribed. Performance on test scores is important, but doesn't necessarily capture all aspects of school quality that are important to parents and communities.

Reader's Score: 8

2. (2) The extent to which the goals, objectives, and outcomes to be achieved by the proposed project are clearly specified and measurable.

Strengths:
The objectives and performance targets listed on pp. e41-e42 are clearly defined and measurable. For example, Objective 2 on p. e41 seeks to "Close achievement gaps for educationally disadvantaged students in AZ CSP schools" and is tied to specific outcomes by project year.

The logic model provided on p. e40 shows the various components of the proposed project, which helps illustrate the relationship between the project's inputs, outputs, and outcomes. The activities proposed in this chart seem to align well the intended outcomes. For example, the application proposes technical assistance with practices that will help 40 charters achieve high-levels of instructional quality, which will ultimately drive the student outcomes listed (e.g. 85% of disadvantaged students attending AZ CSP awarded schools meet or exceed the state average on
Sub Question

each content areas of the state assessment).

Weaknesses:
Encouraging participation in "dual or concurrent enrollment programs or early college high schools" as mentioned in Objective #3 on p. e42 is not aligned with the graduation rate performance target specified on the same page. Although these programs might be beneficial in boosting achievement and preparing students for higher education, it is unclear how they would help improve graduation rates since they generally are not targeted at students who are not on track for graduating.

Reader’s Score: 4

Selection Criteria - Objectives

1. The ambitiousness of the State entity's objectives for the quality charter school program carried out under this program.

Note: In response to this criterion, an applicant may address (or cross reference) some or all of the components of application requirements (I)(A)-(G) in this notice, which require the applicant to provide a description of the State entity’s objectives in running a quality charter school program and how the objectives of the program will be carried out.

Strengths:
The application clearly defines the objectives of the project as shown on pp. e41-e42. Objectives 1 and 2 strike an appropriate balance between being ambitious and attainable. For example, Objective 1 seeks to open 40 new charters that serves disadvantaged students (p. e41), which aligns well with ASBCS's approval of an average of 17 charter applicants (new and replication) per year between FY15-FY18. And Objective 2 seeks to close achievement gaps for educationally disadvantaged students in Arizona CSP schools and provides targets that align well with the state’s prior experience as noted on pp. e32-e33 (e.g. 5 out of 16 school demonstrated academic growth of at least one grade level on the state assessment). Setting effective performance targets may help push stakeholders to improving achievement at faster yet attainable rates.

Weaknesses:
Objective 3 seeks to "Increase high school student academic achievement and graduation by encouraging participation in dual or concurrent enrollment programs or early college high schools" (p. e42). Although graduation rates are important to consider, methodologies for calculating them can be skewed by various factors and are often unreliable as points of comparison. Additionally, the time period of the grant in question (5 years) is not long enough for a substantial number (if any, at all) of grade 9-12 cohorts to be evaluated within, which calls into question the use of graduation rates as a performance target altogether.

Reader’s Score: 14
Selection Criteria - Quality of Eligible Subgrant Applicants

1. The likelihood that the eligible applicants receiving subgrants under the program will meet those objectives and improve educational results for students.

   Strengths:

   The most compelling factor is Arizona’s track record of developing high-quality charters as demonstrated on pp. e46-e52, in which the data illustrate a clear narrative: the state’s charter sector is performing at a high level. Arizona charters have shown especially strong performance on NAEP exams, far outperforming the state’s traditional public schools and nationwide growth on all 4th and 8th grade math and reading assessments (p. e49). As noted in the application, Arizona’s charters are on par with the top states in the country (pp. e50-e52). This provides a high-degree of confidence that subgrantees will serve students effectively as Arizona has clearly cultivated a robust and productive charter sector.

   The application selection criteria provided on pp. e43-e45 advance the likelihood that subgrantees will effectively serve students. Specifically, the subgrantees must demonstrate an effective application as described on p. e44 including a “formalized and systematic process for developing challenging curriculum...that meets the unique needs of disadvantaged students.” This is critical to demonstrating competency, as is the leadership pipeline described on the same page. Awarding grants to talented leaders with demonstrated instructional leadership capabilities would help the applicant attain their stated objectives and performance targets outlined.

   Weaknesses:

   No weaknesses noted.

Reader’s Score: 15

Selection Criteria - State Plan

1. The State entity’s plan to--

   1) Adequately monitor the eligible applicants receiving subgrants under the State entity’s program;

   2) Work with the authorized public chartering agencies involved to avoid duplication of work for the charter schools and authorized public chartering agencies; and

   3) Provide technical assistance and support for--

      i. The eligible applicants receiving subgrants under the State entity’s program; and

      ii. Quality authorizing efforts in the State.

   Strengths:

   The technical assistance plan described on pp. e53-e56 provides extensive support for subgrant applicants through various means, including a pre-application webinar and in-person training sessions throughout the state. This approach ensures that grant opportunities are effectively and thoroughly communicated to leaders in all communities, which could help generate a robust and diverse applicant pool that have unique and innovative approaches to serving students.

   The training and monitoring materials described on p. e54 (e.g. Monitoring Handbook, Budget Allowance, and project timeline) can serve as valuable resources to potential applicants that document important policies and procedures. This helps to ensure smooth and efficient processes for all stakeholders involved.

   Arizona Department of Education’s technical assistance is driven by its Theory of Action (p.e33) and is described on pp. e35-e37. With a focus on instructional rounds and formative assessments, subgrantees will be required to engage in these development opportunities (p. e35) and if implemented effectively, this type of classroom-level support can benefit both school leaders and teachers.
Weaknesses:
It is unclear the extent to which the applicant will incorporate ASBC’s three performance frameworks (academic, operational, financial) into its monitoring. Although the applicant states that “There is virtually no duplication of reporting between the ADE and ASBCS” (p. e53), not incorporating these frameworks may be a missed opportunity to use data that are readily available and that subgrantees must engage with.

Reader’s Score: 14

Selection Criteria - Quality of the Management Plan

1. The Secretary considers the quality of the management plan for the proposed project. In determining the quality of the management plan for the proposed project, the Secretary considers:

Reader’s Score: 11

Sub Question

1. (1) The adequacy of the management plan to achieve the objectives of the proposed project on time and within budget, including clearly defined responsibilities, timelines, and milestones for accomplishing project tasks

Strengths:
The application directly ties its management plan to each of the project’s three objectives (pp. e57-e62), which ensures that the activities outlined are fully aligned with what the applicant seeks to accomplish. This includes detailing the various responsibilities, timelines, milestones, and budget that are associated with each objective’s separate activity. Notably, specific dates are provided for many of the milestones, demonstrating the level of detail the plan contains. This seems adequate to achieve the project’s proposed objectives.

The timelines proposed in the applicant’s management plan seem realistic. For example, potential subgrantees will have over a month to prepare their applications, which will then be reviewed by Arizona Department of Education between 11/9/2018 and 12/10/2018 (p. e58). There is a clear sense of urgency in this process yet sufficient time is provided for applicants to put together thoughtful and effective proposals.

Weaknesses:
Insufficient information is provided that indicates the experience or expertise of the project director. This is concerning since this individual will have a substantial effect on whether the project is completed on time and within budget, and the lack of background information makes it difficult to assess this aspect of the application.

The inclusion of four years of No-Cost Extensions as noted on p. e342 increases the project timeline beyond the five-year limit outlined in the NIA. As a result, the application’s plan does not meet the requirements for finishing on-time.
Sub Question

Reader's Score: 6

2. (2) The extent to which the time commitments of the project director and principal investigator and other key project personnel are appropriate and adequate to meet the objectives of the proposed project

Strengths:
The time commitments of project personnel are laid out in detail on p. e63 and in the application's budget narrative (appendix). In total, 5.66 FTEs will be allocated with minor exceptions in the first two years due to overlapping grant responsibilities (p. e63). This seems adequate to carry-out the activities of the grant.

Weaknesses:
No weaknesses noted.

Reader's Score: 5

Selection Criteria - Parent and Community Involvement

1. The State entity’s plan to solicit and consider input from parents and other members of the community on the implementation and operation of charter schools in the State.

Strengths:
The application notes that the Arizona Charter Schools Program requires applicants to demonstrate community support for their charter school (p. e64). This will help ensure that subgrantees are engaging with their respective communities, including parents, even before they begin operating.

Weaknesses:
Little evidence is provided to demonstrate that the Arizona Department of Education will extensively solicit and consider input from parents and community members on the implementation and operation of charters. Although the State Superintendent of Public Instruction conducts listening tours twice annually as noted on p. e64, this isn't specific to charters and it's unclear how this input is formally collected and used. Overall, the parent and community engagement activities as outlined in the proposal are not extensive.

Reader's Score: 3

Selection Criteria - Flexibility

1. The degree of flexibility afforded by the State’s charter school law and how the State entity will work to maximize the flexibility provided to charter schools under such law.

Strengths:
The application shows that Arizona charters have substantial and meaningful flexibility, as demonstrated by evaluations from National Alliance for Public Charter Schools and the Center for Education Reform (p. e64). Importantly, Arizona charters have autonomy over staffing and curriculum, as noted on pp. e65-e66. This is vital to ensuring that school leaders can make locally-responsive decisions and diverse approaches to education can flourish to meet the needs of communities.

Weaknesses:
It is unclear how the applicant will continue to work toward maximizing flexibilities for charters as there is no mention in the application of current or future efforts in this area.
Priority Questions

Competitive Preference Priority 2 - Equitable Financing

1. To receive points under this priority, an applicant must demonstrate the extent to which the State in which it is located ensures equitable financing, as compared to traditional public schools, for charter schools and students in a prompt manner.

   **Strengths:**
   Arizona provides charters an additional $1,775-$2,968 in per pupil funding via its Additional Assistance funding stream (p. e23), which compensates for the fact that they can't raise revenue via local taxes as districts do. This promotes equalized funding for charter students and is especially valuable given the flexibility charter leaders have in spending these dollars as noted on p. e23.

   Arizona's Estimated Student Count mechanism described on p. e23 allows charters to receive funding in a prompt manner, which is especially valuable for new and small schools that might encounter issues with cash flow.

   **Weaknesses:**
   No weaknesses noted.

Reader's Score: 6

Competitive Preference Priority 3 - Charter School Facilities

1. To receive points under this priority, an applicant must demonstrate the extent to which the State in which it is located provides charter schools one or more of the following:

   a) Funding for facilities;
   b) Assistance with facilities acquisition;
   c) Access to public facilities;
   d) The ability to share in bonds or mill levies;
   e) The right of first refusal to purchase public school buildings; or
   f) Low- or no-cost leasing privileges.

   **Strengths:**
   The Arizona Achievement District program promotes facilities access by helping high-performing charters access credit (pp. e23-e24). Notable features of this include using enrollment demand and financials to determine whether a charter qualifies (pp. e23-e24). Demand is an important measure of quality as it is indicative of parental satisfaction, and financial data are critical to assessing whether charters have the capacity to grow in a sustainable and fiscally responsible manner that uses education dollars productively.

   **Weaknesses:**
   A weakness is that it is unclear the extent to which the Arizona Achievement District program actually benefits charters in accessing facilities. In particular, information on participating charters such as how many have qualified and the projects they have pursued is not provided by the applicant.

Reader's Score: 5
Competitive Preference Priority 4 - Best Practices to Improve Struggling School/LEAs

1. To receive points under this priority, an applicant must demonstrate the extent to which the State in which it is located uses best practices from charter schools to help improve struggling schools and local educational agencies.

Strengths:

Arizona’s Center for Student Achievement uses research and evaluation data from the charter sector to help with its school improvement initiatives as detailed on pp. e24-e25. This serves as a mechanism to apply best practices from charters to underperforming schools.

The dissemination of charter best practices is also described on pp. e71-e72 with the agency’s Research and Evaluation unit holding multiple training opportunities annually around topics such as governance, campus culture, and strategies for educating high-mobility students.

Weaknesses:

The application does not demonstrate that Arizona makes extensive use of charter best practices to improve struggling schools.

Reader’s Score: 2

Competitive Preference Priority 5 - Serving At-Risk Students

1. To receive points under this priority, an applicant must demonstrate the extent to which it supports charter schools that serve at-risk students through activities such as dropout prevention, dropout recovery, or comprehensive career counseling services.

Strengths:

Arizona funds dropout recovery programs for At-Risk charter students as noted on p. e25 and the Arizona State Board of Education supports these efforts as described on the same page. Providing dedicated revenue for At-Risk students is critical as they are more costly to serve and it is evident that the state has prioritized serving these students.

Weaknesses:

The mechanism that Arizona uses for allocating At-Risk funding as described on p. e25 is a weakness, as it ties these dollars to the compliance requirements outlined. As a result, some At-Risk students might not receive the additional resources and charters aren’t given autonomy to use dollars in locally-responsive ways to best serve At-Risk students.

Reader’s Score: 2

Competitive Preference Priority 6 - Best Practices for Charter School Authorizing

1. To receive points under this priority, an applicant must demonstrate the extent to which it has taken steps to ensure that all authorized public chartering agencies implement best practices for charter school authorizing.

Strengths:

Arizona has strong monitoring mechanisms in place, including separate academic, operational, and financial performance frameworks (pp. e27-e28, appendix) that set clear expectations and are used for accountability purposes. Importantly, this information is publicly available in dashboard format as noted on p. e28, helping to ensure a high-degree of transparency.
As a result, ASBCS has quality information with which to make decisions and key stakeholders such as educators, taxpayers, and policymakers have access to these data as well.

Weaknesses:
Charters may be revoked at any time if they fail to meet the academic or operational expectations set forth in the respective performance frameworks as noted on p. e29. However, Arizona does not use its financial performance framework in this manner as noted in the Financial Performance Framework document in the appendix. This is a weakness since financial health is an important indicator of quality and indicates whether a charter’s financial strategy is sound and sustainable.

Reader's Score: 4
Technical Review Coversheet

Applicant: Arizona Department of Education (U282A180003)
Reader #2: ********

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**Priority Questions**

**Competitive Preference Priority 2**

**Equitable Financing**

1. Equitable Financing                          | 6               | 6             |

**Sub Total**                                   | 6               | 6             |

**Competitive Preference Priority 3**

**Charter School Facilities**

1. Charter School Facilities                   | 6               | 4             |

**Sub Total**                                   | 6               | 4             |

**Competitive Preference Priority 4**

**Best Practices to Improve Struggling School/LEAs**

1. Struggling Schools                          | 3               | 2             |

**Sub Total**                                   | 3               | 2             |

**Competitive Preference Priority 5**

**Serving At-Risk Students**
1. At-Risk Students

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**Competitive Preference Priority 6**

**Best Practices for Charter School Authorizing**

1. Best Practices

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**Total**

|        | 123 | 89 |
Technical Review Form

Panel #8 - Panel 8 - Arizona - 1: 84.282A

Reader #2: *******
Applicant: Arizona Department of Education (U282A180003)

Questions

Selection Criteria - Quality of Project Design

1. The Secretary considers the quality of the design of the proposed project. In determining the quality of the design of the proposed project, the Secretary considers:

Reader's Score: 13

Sub Question

1. (1) The extent to which the proposed project demonstrates a rationale

Strengths:

The application presents a well-developed response describing a rationale for the proposed project. The fundamental purpose of AZ's CSP is, “to increase disadvantaged students' academic opportunity to meet rigorous state standards in 40 awarded charter schools by improving schools' internal leadership and instructional capacity” (pg. e32). The applicant describes past success in improving academic growth in previously awarded CSP subgrantee schools serving disadvantaged students to establish a rationale for the proposed project (pp. e32-33). A clear and focused theory of action for AZ's CSP is presented to further demonstrate a rationale that includes selection of transformational leaders, professional development and training for school leaders and teachers, comprehensive monitoring and risk assessment, and a long-term goal for student success (pp. e33-39).

Weaknesses:

While the applicant outlines the percentage of CSP subgrant applicants approved in the past as a quality indicator of AZ’s CSP project design, the application does not specifically explain how, “The AZ CSP application approval process is a high predictor of school success.” (pg. e34). Additionally, performance targets propose to realize, “at least one year’s growth” in English Language Arts and Math on state standardized assessments for “disadvantaged students;” however, the application does not indicate the extent to which targeted students are currently behind in student performance, making it difficult to ascertain if one year’s growth is sufficient or rigorous (pg. e41).

Reader's Score: 8

2. (2) The extent to which the goals, objectives, and outcomes to be achieved by the proposed project are clearly specified and measurable.

Strengths:

The application provides a fully developed response describing the goals, objectives, and outcomes of the proposed project (pp., e40-43). AZ CSP’s logic model includes three project objectives, assumptions and external factors impacting proposed objectives, and clearly specified inputs, outputs, and measurable short-, medium-, and long-term outcomes for the five-year project and beyond (p. e40). Additionally, the proposed goals, objectives, and outcomes are clearly tied to Competitive Preference Priorities and Application Requirements of this federal CSP grant competition.

6/12/18 5:27 PM
Sub Question

Weaknesses:
No weaknesses noted.

Reader’s Score: 5

Selection Criteria - Objectives

1. The ambitiousness of the State entity’s objectives for the quality charter school program carried out under this program.

Note: In response to this criterion, an applicant may address (or cross reference) some or all of the components of application requirements (I)(A)-(G) in this notice, which require the applicant to provide a description of the State entity’s objectives in running a quality charter school program and how the objectives of the program will be carried out.

Strengths:
The application presents a well-developed response describing proposed objectives for AZ CSP (pp. e40-46 and Application Requirements). Proposed objectives seek to increase the number of high quality charters schools that focus on educationally disadvantaged students, close achievement gaps for educationally disadvantaged students, and increase high school student achievement and graduation through dual/concurrent enrollment programs and early college high schools (pp. e41-43).

The applicant will implement key strategies to achieve project objectives: a rigorous subgrant selection process focused on strong governance/leadership; establishing a high-quality leadership pipeline, effective academic programs, and sound financial/operational structures; use of highly-qualified evaluators to evaluate applications and select subgrantees; a structured monitoring and risk-assessment system; and professional development and technical assistance for subgrantees (pp. e43-46). These strategies are based on the assumption that charter school leaders need greater depth of knowledge and capacity to implement system-wide teaching and operations practices.

All Application Requirements are addressed in Appendix I – A, B, C, E, F, and G and support proposed objectives for this selection criterion.

Weaknesses:

While the applicant presents specific and measurable objectives and identifies strategies to achieve the objectives, the application lacks sufficient information to verify the ambitiousness, soundness or feasibility of proposed objectives. For instance, the second objective, “Close the achievement gaps for all educationally disadvantaged students in AZ CSP schools,” as stated is an extremely ambitious goal; however, it is unclear how proposed logic model inputs and outputs (e.g., technical assistance, mature monitoring, etc.) will directly lead to such a dramatic increase in student achievement (pg. e40). Further, the third objective proposes to increase high school student academic achievement and graduation by encouraging participation in dual/concurrent enrollment programs or early college high schools, but it is unclear if educationally disadvantaged students, a primary focus of this application, would be eligible for or well-poised for success in such programs (pg. e42).

Reader’s Score: 14

Selection Criteria - Quality of Eligible Subgrant Applicants

1. The likelihood that the eligible applicants receiving subgrants under the program will meet those objectives and improve educational results for students.
Strengths:
The application provides a fully developed response describing how eligible subgrant applicants are likely to meet proposed objectives and improve educational results for students, especially disadvantaged students.

Page e34 summarizes the rigor of AZ’s CSP application review and approval process as an average of only 31-55% of subgrant applicants since 2009 have been selected for CSP funding. Further, the application documents the strong performance of Arizona charter schools on adopted statewide assessments (AzMERIT) and the National Assessment of Education Progress (NAEP) as further evidence of charter schools improving educational results for Arizona children (pp. e47-52).

Finally, the applicant cites better-than-projected performance of CSP charter schools under its current CSP award as further evidence of the quality of subgrant schools funded under AZ’s CSP (86% of AZ CSP charter schools met or exceeded the current CSP performance goal compared with 80% projected to do so) (pg. e53).

Weaknesses:
No weaknesses noted.

Reader’s Score: 15

Selection Criteria - State Plan

1. The State entity’s plan to--

   1) Adequately monitor the eligible applicants receiving subgrants under the State entity’s program;

   2) Work with the authorized public chartering agencies involved to avoid duplication of work for the charter schools and authorized public chartering agencies; and

   3) Provide technical assistance and support for--

      i. The eligible applicants receiving subgrants under the State entity’s program; and

      ii. Quality authorizing efforts in the State.

Strengths:
The application presents an adequately developed response describing Arizona’s proposed state plan. AZ CSP’s monitoring and risk assessment policy and procedures are summarized under Project Design – Rationale (pp. e37-39) and comprehensively described in the AZ Charter School Program Monitoring Handbook (pp. e223-252). Subgrant monitoring includes academic, financial, and operational assessment and evaluation and is implemented during the planning and implementation phases of each charter school’s federal CSP grant project.

The applicant differentiates the types of data charter LEAs report to the ADE versus data charters report to their authorizer as evidence of non-duplication or reporting between ADE and ASBCS (pg. e53).

The applicant describes specific technical assistance they will provide charter schools, beginning with pre-application training before a school applies for a CSP grant and continuing through the life of a school’s CSP grant (pp. e54-56). Specific technical assistance and training topics include federal CSP grant management, applying for federal funds, using the state’s Grant Management Enterprise (GME) system, Title 1, special education, English Language Learners (ELL), and school finance (pp. e54-56). Finally, ADE proposes to use multiple methods to deliver training and technical assistance to federal CSP subgrant schools including online resources, print materials, public announcements through GME, face-to-face workshops, presentations, meetings, and state conferences (pp. e54-55).

The applicant describes communication and participation between ADE and ASBCS activities, processes, and governance as plans to provide technical assistance and support for quality authorizing efforts in the state (pp. e56-57).
Weaknesses:

While the application cites differentiated reporting by charter schools to ADE and their authorizer (pg. e53), it does not describe strategies it plans to employ to avoid duplication of work for charter schools and authorizers (e.g., creating a standard state application that is aligned with both charter application and federal CSP grant requirements).

Additionally, while the application describes communication, interactions, and relationships between ADE and ASBCS (pp. e56-57), it does not describe its specific plans or intent to provide technical assistance and support for quality authorizing efforts in the state (e.g., promoting national authorizer best practices and standards, providing supports for authorizer capacity building, etc.)

Reader's Score:  13

Selection Criteria - Quality of the Management Plan

1. The Secretary considers the quality of the management plan for the proposed project. In determining the quality of the management plan for the proposed project, the Secretary considers:

Reader's Score:  10

Sub Question

1. (1) The adequacy of the management plan to achieve the objectives of the proposed project on time and within budget, including clearly defined responsibilities, timelines, and milestones for accomplishing project tasks

Strengths:

The application includes an adequately developed response describing ADE’s management plan to achieve project objectives on time and within budget. The proposed management plan is organized by the three project objectives and provides specific information regarding each objective’s activities, responsibilities, timeline, milestones, and types of budget costs (pp. e57-63).

Project tasks are clearly articulated for the first project year (2018-19) and will continue for each of the four subsequent years of the proposed grant program (pp. e57-63). Additionally, management plans are directly tied to performance targets for each project objective.

Weaknesses:

While the application provides a detailed management plan for each proposed project objective, the budget narrative (pp. e342-347) outlines a nine-year project period (five years plus four no-cost extensions), calling into question the applicant’s fundamental ability to achieve project objectives on time and within budget.

Additionally, the lack of correlation between and rigor of proposed project activities and performance targets under the second objective (as previously identified under Selection Criterion B) are confounded in the proposed management plan. Specifically, it is unclear how management plan activities and milestones will result in closing achievement gaps for educationally disadvantaged students in AZ CSP schools (pp. e59-60).

Reader's Score:  5

2. (2) The extent to which the time commitments of the project director and principal investigator and other key project personnel are appropriate and adequate to meet the objectives of the proposed project
Sub Question

Strengths:
The application provides a fully developed plan for project personnel to appropriately and adequately meet the objectives of the proposed project. Five full-time equivalencies (FTE) are solely dedicated to lead and carry out the work of ADE’s proposed project. Time commitments for the AZ CSP Director and Educational Specialists are clearly presented for five years of the proposed project (pp. e63-64 and e342-347).

Additionally, the application describes a specific percentage of the Director’s time and one Education Specialist’s time that will be dedicated to closing out the remaining two years of the 2015 Award No-Cost Extension as the new state award commences in 2018 (pg. e63).

Weaknesses:
No weaknesses noted.

Reader’s Score: 5

Selection Criteria - Parent and Community Involvement

1. The State entity’s plan to solicit and consider input from parents and other members of the community on the implementation and operation of charter schools in the State.

Strengths:
The application describes semi-annual “state-wide listening tours” conducted by the State Superintendent of Public Instruction as plans to solicit and consider input from parents and other community members on the implementation and operation of charter schools in the state (pg. e64). Additionally, the application cites CSP application requirement to demonstrate support for a charter school in the specified community as evidence of addressing this selection criterion (pg. e64).

Weaknesses:
The applicant provides a poorly developed response to this selection criterion. While state-wide listening tours and CSP application requirements are offered as evidence to involve parents and other community members in charter schools (pg. e64), the application lacks a specific description of how ADE plans to solicit and consider input from such stakeholders in the implementation of AZ’s CSP or on the general implementation and operation of charter schools in the state.

Reader’s Score: 4

Selection Criteria - Flexibility

1. The degree of flexibility afforded by the State’s charter school law and how the State entity will work to maximize the flexibility provided to charter schools under such law.

Strengths:
The application presents an adequately developed response describing the degree of flexibility established under the state’s charter school law (pp. e64-66). Arizona charter schools are their own LEAs, have full control over their budgets, receive public funds directly from the state/federal government, have their own governing boards, and have flexibility over their daily operations, staffing and curriculum. As further evidence of this flexibility, the applicant cites Arizona’s grade of “A” from the Center for Education Reform, a Washington-based education reform advocacy group that promotes and recognizes states that provide significant autonomies and flexibilities to charter schools (pg. e64).
**Weaknesses:**

While the application clearly showcases the high degree of flexibility and autonomy provided to Arizona charter schools under state law (pp. e64-66), it does not describe specific plans for how ADE will work to maximize the flexibility provided to charter schools under state law (e.g., encourage charter schools to fully implement statutorily-provided autonomies, provide technical assistance on best practices in school administration and operational areas for which charter are exempt, etc.)

**Reader's Score:** 3

**Priority Questions**

**Competitive Preference Priority 2 - Equitable Financing**

1. To receive points under this priority, an applicant must demonstrate the extent to which the State in which it is located ensures equitable financing, as compared to traditional public schools, for charter schools and students in a prompt manner.

   **Strengths:**

   The applicant provides a fully developed response in describing its equitable financing for charter school in the state. Charter schools are considered local education agencies (LEA) in the state and receive the same Base Support Level (BSL) funding as do other public schools (p. e22). The BSL funding formula provides additional funds (up to .5 per pupil unit) to smaller LEAs and many, if not all, charter schools meet that definition and receive 1.5 per pupil funding through the state's system of small school weights.

   Additionally, Arizona provides Additional Assistance funding to charter schools (p. e23) to offset the schools lack of access to direct taxpayer funding (e.g., levy) to fund building leases, participate in public bond offerings, and other areas the charter deems necessary to support its educational mission. Together, these funding sources are known as Charter Equalization Assistance.

   **Weaknesses:**

   No weaknesses noted.

   **Reader's Score:** 6

**Competitive Preference Priority 3 - Charter School Facilities**

1. To receive points under this priority, an applicant must demonstrate the extent to which the State in which it is located provides charter schools one or more of the following:

   a) Funding for facilities;
   b) Assistance with facilities acquisition;
   c) Access to public facilities;
   d) The ability to share in bonds or mill levies;
   e) The right of first refusal to purchase public school buildings; or
   f) Low- or no-cost leasing privileges.

   **Strengths:**

   The applicant provides a well-developed response addressing how the state supports charter school facilities. In addition to Charter Equalization Assistance referenced under Competitive Preference Priority 2, the state created the Arizona Achievement District in 2017, a credit enhancement program designed to assist high performing charter schools in accessing credit and renovate facilities for school use (p. e23). Finally, state statute (ARS § 15-189(A)) provides charters with assistance with facilities acquisition and access to public facilities by requiring the School Facilities Board, in
conjunction with the Department of Administration, to annually publish a list of vacant and unused buildings owned by the state or by school districts, that may be suitable for charter school operations (p. e24).

**Weaknesses:**
While the state provides extensive support for charter school facilities (funding, acquisition, access to public facilities, and the ability to participate in public bond offerings), there is no evidence the state provides charters the right of first refusal to purchase public school buildings or low- or no-cost leasing privileges. Additionally, while the Arizona Achievement District provides credit enhancement facilities assistance for high performing charter schools, the applicant does not indicate the number or percentage of charter schools that actually benefit from this targeted support (pg. e24).

**Reader's Score:** 4

**Competitive Preference Priority 4 - Best Practices to Improve Struggling School/LEAs**

1. To receive points under this priority, an applicant must demonstrate the extent to which the State in which it is located uses best practices from charter schools to help improve struggling schools and local educational agencies.

**Strengths:**
The applicant provides an adequately developed response to address how the state uses charter school best practices to help improve struggling schools and districts. The Arizona Superintendent of Public Instruction developed a partnership in 2017 with the Center for Student Achievement (the Center) specifically focused on high-quality student achievement. The initiative emphasizes professional development and publication of rigorous and transparent research and evaluation from the charter sector (pg. e24). Specific supports include how to make student data analysis applicable and actionable, which is currently in practice by over 90 district and charter schools and schools on Native American reservations.

**Weaknesses:**
While the applicant describes the state’s initiative to use, in part, charter school best practices to help support teachers and leaders in district schools and provides an example of the Center’s consulting service regarding data analysis, the application does not identify or describe other professional development, research, or evaluation best practices that are specifically derived from charter schools (pp. e24-25).

**Reader's Score:** 2

**Competitive Preference Priority 5 - Serving At-Risk Students**

1. To receive points under this priority, an applicant must demonstrate the extent to which it supports charter schools that serve at-risk students through activities such as dropout prevention, dropout recovery, or comprehensive career counseling services.

**Strengths:**
The applicant provides an adequately developed response to demonstrate its support for charter schools that serve at-risk students. State statute (ARS § 15-901.06) funds dropout recovery programs for district and charter schools serving at-risk students (p. e25). The legislation outlines permissions and requirements schools must follow when providing a dropout recovery program for at-risk students.
Weaknesses:

While the state provides funding for dropout recovery programs in charter and district schools and the statute outlines school requirements to support at-risk students (ARS § 15-901.06), the application does not identify or describe other supports it intends to provide to charter schools serving at-risk students (e.g., professional development, technical assistance or career counseling services) (pp. e25-26).

Reader's Score: 2

Competitive Preference Priority 6 - Best Practices for Charter School Authorizing

1. To receive points under this priority, an applicant must demonstrate the extent to which it has taken steps to ensure that all authorized public chartering agencies implement best practices for charter school authorizing.

Strengths:

The application provides an adequately developed response outlining steps Arizona has taken to ensure that charter school authorizers implement best practices for charter school authorizing (pp. e26-32). Fundamental authorizing responsibilities are specifically defined in statute (e.g., new charter school application process, contract requirements, periodic review and evaluation, requiring schools to conduct and submit an annual independent audit, and annual authorizer report to the state's Auditor General, ARS §§ 15-183 and 15-914) (pp. e26-32). The application further describes authorizing strategies employed by the Arizona State Board for Charter Schools (ASBCS), the state's primary authorizer that sponsors 99.9% of charter schools in the state, including the use of academic, financial, and operational frameworks for performance monitoring and an annual evaluation of all schools based on Arizona's A-F School Accountability Plan (pg. e30).

Weaknesses:

While the application describes statutory authorizing requirements and the ASBCS implements a comprehensive charter school oversight and evaluation system, the application does not identify or describe additional steps ADE has taken to ensure all authorizers are implementing best practices (e.g., training, technical assistance based on a review of an authorizer's annual report, promoting national standards, principles, and practices for quality authorizing, or evaluating authorizer performance based on data submitted in an authorizer's annual report) (pp. e26-32).

Reader's Score: 3

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Status: Submitted
Last Updated: 06/12/2018 04:12 PM
Technical Review Coversheet

Applicant: Arizona Department of Education (U282A180003)
Reader #3: ********

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Priority Questions

Competitive Preference Priority 2
Equitable Financing
1. Equitable Financing                          | 6               | 5             |

Sub Total                                        | 6               | 5             |

Competitive Preference Priority 3
Charter School Facilities
1. Charter School Facilities                   | 6               | 4             |

Sub Total                                        | 6               | 4             |

Competitive Preference Priority 4
Best Practices to Improve Struggling School/LEAs
1. Struggling Schools                          | 3               | 2             |

Sub Total                                        | 3               | 2             |

Competitive Preference Priority 5
Serving At-Risk Students
1. At-Risk Students
   \[ \begin{array}{cc}
   & 3 & 2 \\
   \text{Sub Total} & 3 & 2 \\
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**Competitive Preference Priority 6**

**Best Practices for Charter School Authorizing**

1. Best Practices
   \[ \begin{array}{cc}
   & 5 & 3 \\
   \text{Sub Total} & 5 & 3 \\
   \end{array} \]

\[ \text{Total} \quad 123 \quad 87 \]
Technical Review Form

Panel #8 - Panel 8 - Arizona - 1: 84.282A

Reader #3: *******
Applicant: Arizona Department of Education (U282A180003)

Questions

Selection Criteria - Quality of Project Design

1. The Secretary considers the quality of the design of the proposed project. In determining the quality of the design of the proposed project, the Secretary considers:

Reader's Score: 12

Sub Question

1. (1) The extent to which the proposed project demonstrates a rationale

Strengths:

The applicant provides a well-developed rationale for the proposed project. Student achievement of startup schools that received past subgrant awards is provided (e32-33). This data and analysis give strong evidence that CSP subgrantees that receive technical assistance demonstrate stronger academic growth on state assessments than those that do not receive technical assistance (e32-33). This data aligns to the Theory of Action which focuses on the need for transformational leadership, monitoring and high quality professional development as requirements for AZ CSP schools to be able to meet goals and be sustainable beyond grant funds (e34). The accompanying logic model is extremely well developed and directly aligned with the Theory of Action. The logic model clearly demonstrates processes that will be followed to move toward achieving short, mid and long-term outcomes (e40).

Finally, the applicant describes technical assistance and embedded professional learning processes that will be required of all CSP subgrantees which include instructional rounds and formative assessments. This is well aligned to the identified Theory of Action (e35-37), logic model and data from past CSP subgrants.

Weaknesses:

While the overall rationale is well developed there are some weaknesses within the response. First, the applicant provides two tables (e34) that are difficult to follow because the information within the breakdown and the information in italics do not appear to be connected. Second, the response lacks sufficient evidence to support the statement that Instructional Rounds (“data has consistently confirmed IR value and impact on school's performance” – e35) and Formative Assessment training has had strong impact on past CSP subgrantees (e35-36).

Reader's Score: 8

2. (2) The extent to which the goals, objectives, and outcomes to be achieved by the proposed project are clearly specified and measurable.

Strengths:

The applicant’s goals, objectives and outcomes are well developed. The project specific objectives and outcomes meet all GPRA requirements (NIA p 65-65) for student growth in that they are specific, measurable, achievable, realistic and timebound. More specifically, the short-term outcomes (within 5 years) “40/40 AZ CSP schools demonstrate baseline disadvantaged students’ academic growth of at least one year in math and reading/language arts on the state assessment” (e19). This is evidence of that the objective has baseline data, a performance
Sub Question

measure and a performance target. The outcome is focused on student academic achievement during the grant period and will help to meet GPRA e2 (the percentage of 4th and 8th grade students achieving at or above proficient on state math/reading exams). Both the logic model (e40) and narrative (e41-42) provide a detailed annual breakdown of performance targets for academic growth for objective 2 (student growth). The applicant describes that it will comply with annual reporting on all three GPRA requirements (e80).

Weaknesses:

While the response is well developed, there are two primary weaknesses. There are discrepancies in language among the abstract (e19), logic model (e40) and narrative description of objectives (e41-42) as it relates to short term outcomes and performance targets. The abstract (e19) identifies that gap closing will be measured by comparing students of similar demographics but this is not mentioned within the logic model (e40) or narrative (e41). In the narrative, Objective 2 identifies performance targets for the 5 cohorts as the method of evaluating how the project will close gaps (e41), however it is unclear how the applicant will measure its plans to close achievement gaps.

Reader’s Score: 4

Selection Criteria - Objectives

1. The ambitiousness of the State entity’s objectives for the quality charter school program carried out under this program.

Note: In response to this criterion, an applicant may address (or cross reference) some or all of the components of application requirements (I)(A)-(G) in this notice, which require the applicant to provide a description of the State entity’s objectives in running a quality charter school program and how the objectives of the program will be carried out.

Strengths:

The applicant demonstrates adequate ambitiousness in its objectives to create a quality charter school program by at least minimally describing all application requirements (I)(A)-(G).

The project objectives for a quality charter school program are adequately described. For example, the applicant describes appropriate processes for supporting charters in understanding and accessing federal funds, including CSP subgrant funds. The applicant describes the use of print and online resources, public announcements through the grants management system and face to face sessions to provide this important information (e67). ADE offers technical assistance each year to help new and expanding charter operators utilize the grants management system, so they can effectively apply for federal funds (e67) and holds trainings, so schools can accurately process student enrollment counts and poverty data (e68). Finally, ADE has a full time Title I specialist that assists new and significantly expanded charters, so they can effectively and successfully utilize ESEA funds to support disadvantaged youth (e68). In addition, as required by statute, a peer review process is described as part of the subgrant evaluation (e45).

The applicant provides an adequate description of the State entity’s objectives in running a quality charter school program as evidenced by its description of the charter application process (e43-44). This process includes supports for boards through partnerships and available training provided by the Arizona Charter School Association (ACSA) and the National Charter School Resource Center (NCSRC). This is directly connected to school sustainability and the need for a strong succession plan for leadership (e43-44). The applicant mentions that it uses the ASBCS Financial Framework as part of the charter authorization application and for annual monitoring. The use of this financial framework will improve authorizers’ ability to determine the extent to which charters are effectively managing their funds. The applicant adequately demonstrates that the objectives of the program will be carried out through its explanation of how the ACSA will recruit and train leaders to create a leadership pipeline essential for running quality charter school programs (e44).
Weaknesses:

The proposal’s weaknesses generally occur because the applicant does not provide sufficient depth of evidence to support general statements it makes in regard to articulating project objectives to carry out a high-quality charter school program, running a quality charter program or how it will carry out the program objectives.

For example, the applicant states it ‘generated a set of evidence based qualitative leading indicators that predicts the success of charter schools’ (e73), but there is limited information on what the indicators are, how they were generated or the research behind them that qualified them to be ‘evidence based’. Therefore, it is unclear how the indicators will assist in the applicant carrying out the program objectives. The applicant states “the goal of promoting retention… will be addressed in the application and monitoring” (e71), but there is inadequate follow up information provided to clarify this statement and demonstrate how it supports the applicant’s ability to run a high-quality charter program.

The applicant’s plan for closing achievement gaps is based upon evaluating student growth in comparison to students of similar demographics. This is contradictory to the federal definition which monitors subgroup achievement by race, gender, ethnicity, disadvantage, etc. in comparison to the ‘majority’ or ‘all students’ or ‘white’ students etc. In the abstract narrative (e19) the applicant identifies Objective 2 as closing the achievement gaps for educationally disadvantaged students in AZ CSP schools. The outcomes assess change within similarly educationally disadvantaged subgroups which will not provide the data required to determine if achievement gaps are closing (e19). Using this process to monitor achievement gap data can result in data inconsistencies when reporting on progress toward achieving program objectives.

Reader’s Score: 13

Selection Criteria - Quality of Eligible Subgrant Applicants

1. The likelihood that the eligible applicants receiving subgrants under the program will meet those objectives and improve educational results for students.

Strengths:

The applicant provides a fully developed response giving significant evidence that subgrantees will meet objectives and improve educational results for students. The applicant provides evidence that the AZ CSP application approval process is a high predictor of school quality by demonstrating that in the last CSP grant, ADE exceeded the projected % of AZ CSP charter schools (projected 80%; actual 86%) that would meet or exceed the state average of students with similar demographics on each state assessment by the end of year 2 (e53).

In addition, the applicant provides clear data demonstrating the impact of charter schools on the academic achievement of educationally disadvantaged subgroups (e47-49) as evidenced by the fact that economically disadvantaged, homeless, English Learners and students with disabilities attending AZ charters are generally outperforming traditional districts and the state as a whole on AzMERIT assessments (e47-48) and overall performance of AZ charter students on NAEP for 8th graders is extremely high (e49-50). This provides evidence that the AZ CSP process as currently designed is meeting CSP program objectives and improving outcomes for students. Therefore, it is highly likely that this process will continue to support subgrantees that can will also meet the new CSP program objectives and improve outcomes for students.

The applicant clearly defines the CSP requirement that schools must serve 40% educationally disadvantaged youth in order to be eligible for CSP funding (e73). As part of their application, they must also describe how they have the capacity to recruit the number of students needed to meet recruiting requirements. This demonstrates that the AZ CSP program will serve eligible applicants that are serving educationally disadvantaged students as required by this competition.
Weaknesses:

No weaknesses noted

Reader's Score: 15

Selection Criteria - State Plan

1. The State entity’s plan to--

   1) Adequately monitor the eligible applicants receiving subgrants under the State entity’s program;

   2) Work with the authorized public chartering agencies involved to avoid duplication of work for the charter schools and authorized public chartering agencies; and

   3) Provide technical assistance and support for--

      i. The eligible applicants receiving subgrants under the State entity’s program; and

      ii. Quality authorizing efforts in the State.

Strengths:

The applicant provides adequate information on the state plan for monitoring, avoiding duplicity and providing technical assistance.

1. The applicant provides clear evidence of its plan, and capacity, to adequately monitor subgrantees by monitoring educational and fiscal/operational outcomes (e37-38). This is evidenced by the CSP Monitoring Handbook that is provided to all subgrantees as well as the breakdown of monitoring activities during both planning and implementation phases (e37-38). ADE plans to revise the Monitoring Handbook to ensure it is aligned with current CSP requirements (e37). ADE uses a risk assessment instrument (e217-220) to monitor compliance with fiscal policies. Subgrantees that are out of compliance or are demonstrating risk factors are required to take corrective action and consequences can include the state putting a hold on CSP funding during audits (e39).

2. The applicant states that they have virtually no duplications because each organization has different responsibilities (e53).

3. The applicant provides strong evidence of its technical assistance plan to support subgrantees during the planning and implementation phases. Professional development and technical assistance as described (e33-37) is directly aligned to the Theory of Action and includes training related to transformational leadership, monitoring and instruction, including instructional rounds and formative assessment. The applicant completely responds to the application requirements A(2)-knowing and receiving technical assistance for CSP funds and A(3abc) accessing federal funds/supporting special education and English learners by providing transparent information on the ADE and CSP websites, and offering a variety of technical assistance options including participation in webinars, calls and face to face meetings (e53-54 and again e67-69).

Weaknesses:

1. No weaknesses noted.

2. The application lacks sufficient self-assessment or an analysis of the strengths and weaknesses of the state’s charter initiative which could inform the organization of potential duplication. Instead, the applicant states that there is virtually no duplication of reporting between ADE and ASBCS (e53) because each organization is separate and has distinct responsibilities. Finally, information regarding potential for duplication of work is focused on the relationship between ADE and ASBCS but provides insufficient information regarding the potential duplicity for Arizona State University charter schools.

3. No weaknesses noted.

3i. The applicant inadequately documents how it will provide support to ASBCS and Arizona State University to ensure there are ongoing efforts to promote high quality authorization. While it is positive that the state superintendent sits on the ASBCS board and AZ CSP Project Director attends ASBCS Board meetings and retired ASBCS employees review charter applications, these activities do not have the potential to provide ongoing evaluation and continuous improvement
for the overall charter initiative in the state of Arizona. In addition, the application lacks information on the extent of quality of authorization provided by the Arizona State University.

Reader's Score: 13

Selection Criteria - Quality of the Management Plan

1. The Secretary considers the quality of the management plan for the proposed project. In determining the quality of the management plan for the proposed project, the Secretary considers:

Reader's Score: 11

Sub Question

1. (1) The adequacy of the management plan to achieve the objectives of the proposed project on time and within budget, including clearly defined responsibilities, timelines, and milestones for accomplishing project tasks

Strengths:
The applicant adequately describes a management plan aligned to the project's 3 objectives, theory of action and logic model. The applicant directly links management plan objectives with performance measures, performance targets and baseline data to ensure reader clarity and then adds a complete workplan that includes responsibilities, timelines, milestones and associated budget items (e57-63).

In addition to the information directly provided within the management plan prompt, the applicant provides an overview of the five year technical assistance and professional development plans (e35).

The applicant's workplan includes not only responsibilities of AZ CSP staff, but also subgrantees, ACSA, the state board of education and ADE's research and evaluation department(e57-63). This allows for a more comprehensive overview of the project plan.

Weaknesses:
There are weaknesses within the management plan as it pertains to alignment between the application and budget. Per USDOE requirements this is a 5 year grant. The application indicates a plan to request 4 years of no cost extensions, (e342) which brings into question their capacity to complete the project on time and within budget. There is a staffing discrepancy regarding the hiring timeline of specialists between the timeline (e60) and the budget narrative (e343-344). ACSA is mentioned in the management plan chart (e57) but there is no line item in budget narrative (e343-344). The management plan charts (e60,e62) mention technical assistance – including academics (PD) – is provided by salary, but the budget narrative (e345) sets aside funds for contracts for PD. The management plan charts (e60,e62) mentions that ADE will provide external research and evaluation but there is no narrative text or budget allocation (e343-344).

Reader's Score: 6

2. (2) The extent to which the time commitments of the project director and principal investigator and other key project personnel are appropriate and adequate to meet the objectives of the proposed project

Strengths:
The applicant provides well developed information regarding responsibilities and time commitments of the project director and the 4 education specialists to demonstrate that their time commitment is appropriate and adequate to
Sub Question

meet the key objectives. As evidenced on e63-64 and in the budget narrative (e343-344), the education specialists phase in over time as responsibilities grow. The Project Director is full time but has responsibilities for closing out previous CSP grant activities during years 1 and 2. The budget request is commensurate with the Project Director’s time commitment during year’s 1 and 2 when the Project Director will be split between multiple CSP grant activities. It also is commensurate with the time commitment for years 3-5 when those responsibilities end and the Project Director’s role is more directly focused on this CSP project

Weaknesses:
No weaknesses noted

Reader’s Score:  5

Selection Criteria - Parent and Community Involvement

1. The State entity’s plan to solicit and consider input from parents and other members of the community on the implementation and operation of charter schools in the State.

Strengths:
The applicant provides some information regarding the state’s plan to garner parent and community input. In particular, the applicant reports that parent and community input on charter schools is a key part of the state superintendents listening sessions (e64). The applicant also describes that founders are required to document active partnerships with parents and family groups as part of their charter applications (e64).

Weaknesses:
The state entity’s plan for parent and community involvement is poorly developed (e67-69). While the state superintendent’s listening sessions (referenced above) may be valuable, there is no evidence documenting the extent to which charter families or other stakeholders attend and actively engage in these sessions. The application does not clearly describe how the listening sessions, or other parent and community involvement efforts, will be used to solicit and consider input from parents and other members of the community on the implementation and operation of charter schools in the State.

The applicant mentions that documentation of active partnership is required as part of the charter application process but does not provide sufficient detail to determine the impact such documentation has on authorization (e64). The applicant also does not document how the CSP subgrant application addresses family and community stakeholder input.

The application lacks sufficient detail describing the extent to which ADE itself formally engages charter families and other charter stakeholders to develop a strong understanding of their needs. It also lacks details describing how ADE then uses this data to inform state level practices and policies.

Reader’s Score:  4

Selection Criteria - Flexibility

1. The degree of flexibility afforded by the State’s charter school law and how the State entity will work to maximize the flexibility provided to charter schools under such law.

Strengths:
The applicant demonstrates strong flexibility of the state’s charter law by citing two external sources that regularly ‘grade’ charter school laws on areas such as flexibility and autonomy. For example, the Center for Education Reform annually ranks each state based on the strength of its charter school law, in part of flexibility and autonomy, and AZ consistently
receives an A rating (e64). In 2014, the National Alliance for Public Charter Schools ranked AZ second in 'automatic exemptions'(e64). The applicant also provides strong information regarding state flexibility practices such as flexibility in how the school designs its calendar, as long as the school meets or exceeds the state’s minimum instructional hours. Finally, the applicant clearly defines areas where flexibility is not allowed including state and federal accountability, civil rights, insurance, health and safety (e65).

Weaknesses:
While the degree of flexibility is strong, the applicant's response lacks information responding to the second part of this criteria which requires the application to describe “how the State entity will work to maximize the flexibility provided to charter schools under such law” (e64-65).

Reader's Score: 3

Priority Questions

Competitive Preference Priority 2 - Equitable Financing

1. To receive points under this priority, an applicant must demonstrate the extent to which the State in which it is located ensures equitable financing, as compared to traditional public schools, for charter schools and students in a prompt manner.

Strengths:
The applicant provides a well-developed response describing the state’s efforts to ensure equitable and prompt financing as compared to traditional public schools (e22-23).
Equitable Funding: The applicant provides relevant code (ARS15-185B1) establishing the fact that state law requires charters to receive the same base funding as traditional districts. Small charters (like small districts) that meet the state’s ‘small schools requirement’ are eligible to receive an additional .50 per student weight which provides additional funding to support these schools. The applicant also states that since most charters are small, they are therefore eligible (e21).
Arizona also has a Charter Additional Assistance fund to offset the lack of ability to levy taxes. These funds may be used to fund building leases or participate in bond offerings for building purchases and other needs to support the mission (e23).

Prompt funding: The applicant describes the estimated student count that allows charters to submit their estimated counts prior to when the school starts, so they don’t have to wait for funding. Every 20 days thereafter, the charter school must submit a revised count to the ADE finance office so that the funding can be updated throughout the year, giving a more accurate financial accounting (e23).

Weaknesses:
While the applicant provides a well-developed response, there are some minor weaknesses in regard to equitable and prompt financing. The description of The Charter Equalization Assistance program (e23) lacks a sufficient comparison to traditional public schools needed to determine if this practice is equitable and a timeline for distribution of to determine if the state provides these funds promptly to charters.

Reader's Score: 5

Competitive Preference Priority 3 - Charter School Facilities

1. To receive points under this priority, an applicant must demonstrate the extent to which the State in which it is located provides charter schools one or more of the following:
   a) Funding for facilities;
   b) Assistance with facilities acquisition;
c) Access to public facilities;
d) The ability to share in bonds or mill levies;
e) The right of first refusal to purchase public school buildings; or
f) Low- or no-cost leasing privileges.

Strengths:
The applicant adequately describes the extent to which the state provides facilities supports for charters. In 2017, the state created the Arizona Achievement District (ARS 15-2155) to assist high performing charters in accessing credit to renovate facilities (a23). The applicant included a quote from the code describing the process for determining ‘high performing’. This fund also requires indicators such as a verifiable enrollment demand and a sound financial plan as part of the process for accessing this credit. The combination of these provides a rigorous, yet clear description of facility support. The applicant also refers to (ARS 15-189) that requires the School facilities board to annually create a list of all vacant and unused buildings or portions of buildings owned by the state or school districts that may be suitable locations for schools (e24).

Weaknesses:
While the applicant adequately describes the state’s facilities supports, there are some weaknesses identified. The School Facilities Board is required to create list of vacant or unused buildings that may be suitable for schools, but it is only required to submit the list to the Governor, Senate President, House Speaker and Secretary of State (e24). The application lacks sufficient details describing how this list is made available to, and communicated effectively to charter schools, authorizers or school founding organizations. As described above, the standards for eligibility to receive Arizona Achievement District funds are rigorous (e24). There is not enough detail provided about this resource regarding the extent to which charters are able to meet these rigorous standards and access the funding.

Reader's Score: 4

Competitive Preference Priority 4 - Best Practices to Improve Struggling School/LEAs

1. To receive points under this priority, an applicant must demonstrate the extent to which the State in which it is located uses best practices from charter schools to help improve struggling schools and local educational agencies.

Strengths:
The applicant demonstrates that it is well situated to provide significant supports to struggling schools and LEAs through the Center for Student Achievement (Center) created in 2017 (e24). The Center is focused on professional development, research and evaluation of best practices around high-quality school improvement (e24). Through the Center, Arizona can provide programs for school leaders and teachers in struggling schools as well as national consulting services. The Center is serving over 90 LEAs in its first year, which is a positive sign of interest in the work (e25). While the applicant did not provide detailed information on its dissemination plans within the CPP 4 criteria, there is a more detailed explanation and plan found in the ‘application requirements’ section on e71-72. In this section the applicant describes past dissemination efforts, clarifies the relationship with the ADE Research and Evaluation department and explains the future plans for the dissemination of best practices from high quality charters to support struggling LEAs and charters.

Weaknesses:
While the response is well developed, there are some weaknesses. The application lacks sufficient detail regarding the types of services provided by the Center that aligns to this CCP (e24). There is limited information from schools using the services related to this CCP to describe qualitative and/or quantitative results achieved through collaboration with the Center. The applicant describes significant dissemination efforts (e71-72) that will be provided by the applicant and the
Center. However, in the management plan table (e60) it states that $1000 per year in years 4 and 5 will be used for sharing and disseminating best practices. This amount may be inadequate funding to cover the costs of dissemination efforts (e71-72) described.

**Reader's Score:** 2

**Competitive Preference Priority 5 - Serving At-Risk Students**

1. To receive points under this priority, an applicant must demonstrate the extent to which it supports charter schools that serve at-risk students through activities such as dropout prevention, dropout recovery, or comprehensive career counseling services.

**Strengths:**
The applicant sufficiently describes the availability of dropout recovery programming including relevant code (ARS 15-901.06), key standards, and the requirement of individual learning plans to support students. It also mentions that career and college counseling are required as part of the service delivery model (e25).

**Weaknesses:**
The applicant did not provide adequate information to demonstrate how the applicant supports these programs/schools in their efforts to ensure high quality educational options for at risk youth.

**Reader's Score:** 2

**Competitive Preference Priority 6 - Best Practices for Charter School Authorizing**

1. To receive points under this priority, an applicant must demonstrate the extent to which it has taken steps to ensure that all authorized public chartering agencies implement best practices for charter school authorizing.

**Strengths:**
The applicant provides adequate information regarding the processes, procedures and relevant code that it believes will promote high quality authorization practices. For example: Arizona Administrative Code Title 7, Chapter 5, Article 2 requires multiple reviews of a charter application package and as part of that review process, founding organizations are able and expected to make revisions to improve their application (e36). In addition, the applicant specifically describes a comprehensive monitoring process required by statute ARS 15-183R that requires a review of academics, operational and financial aspects of the school at least every five years (e27). Independent annual audits are required, and authorizers have a variety of tools they can use to provide meaningful consequences when schools do not meet charter expectations including financial penalties (10% loss of funds for late submission of audits) and charter revocation (e29-31).

**Weaknesses:**
While the applicant provides comprehensive information regarding their practices, the applicant lacks a distinct comparison to national best practices for authorizing charter schools. The application lacks sufficient information regarding how both the ASBCS and the Arizona State University uses national best practices for authorizing charter schools. There is one reference in this section that states that the Arizona State University follows the same authorization process (e26), but evidence of the Arizona State University's overall use of best practices for authorizing charter schools is lacking.