

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

Status: Submitted

Last Updated: 06/12/2018 04:07 PM

Technical Review Coversheet

Applicant: Colorado Department of Education (U282A180023)

Reader #1: *****

	Points Possible	Points Scored
Questions		
Selection Criteria		
Quality of Project Design		
1. Project Design	15	9
Objectives		
1. Objectives	20	12
Quality of Eligible Subgrant Applicants		
1. Subgrant Applicants	15	13
State Plan		
1. State Plan	20	17
Quality of the Management Plan		
1. Management Plan	15	7
Parent and Community Involvement		
1. Involvement	10	6
Flexibility		
1. Flexibility	5	4
Sub Total	100	68
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	1
Sub Total	3	1
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	3
Sub Total	5	3
Total	123	84

Technical Review Form

Panel #3 - Panel 3 - Colorado - 1: 84.282A

Reader #1: *****

Applicant: Colorado Department of Education (U282A180023)

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: 9

Sub Question

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

Strengths:

The plan provides evidence of success in opening charter schools (pg. e40), with more than 250 charter schools and representation in more than 13% of the student market share in the state. Additionally, these schools serve, on average, higher rates of students who are English Learners and students who identify as minority than their traditional school counterparts. Further, these schools also outperform their traditional school counterparts.

In addition to citing success of existing charter efforts (which includes those awarded through historical grant opportunities), the application also outlines current barriers that pose challenges to charter school growth and quality moving forward (pg. e41). These include real estate and viable facilities, stagnation in population and even decreases in some geographic areas, as well as shifts in risk tolerance for new school approvals by authorizers. Combined, these create a frame for the project plan rationale which seeks to resolve these barriers through increased front-end supports, resources, and initiatives. These initiatives, outlined in the logic model (pg. e46), include increased resources to support continual improvement in charter school authorizing, field-based coaching for and support to charter developers, and incentives for schools seeking to serve increased proportions of historically underserved populations.

Weaknesses:

Although mean scale scores are provided (pg. e19) to highlight the fact that charter schools outperform their traditional school counterparts—including at a disaggregated level with English Learner students and students who identify as minority—additional information is not provided to determine to the magnitude of this difference. Without knowing how many schools and students are included in the figures provided, as well as the range of scale scores possible, the average difference in scores (in most cases, less than 5 points) may be insignificant. It is also unclear why high school information was not included in this evidence, as both the scope of the project plan and subgrant eligibility (pg. e191) are not contained solely to K-8 endeavors or improvements.

It is unclear whether the Applicant has considered how provision of start-up coaching to new school applicants will impede the new school review process currently managed and directed by authorizers (pg. e41) or compromise the role of the Department in serving as the appellant body in appeal of a new school denial decision (pg. e23). It also does not explain how the Department will remain unbiased in evaluation and monitoring of applicants and subgrantees if supports and coaching are provided directly; the applicant could argue, for example, that failure to

Sub Question

meet goals or compliance standards are the result of advice given through direct trainings. Lastly, it is unclear how resolution will occur if definitions of quality or readiness vary between the authorizer and the Department with regard to a charter school.

Although part of the rationale highlights that there are still too many students without options' (pg. e40), specific information or evidence to support this claim was not provided in the application. The application certainly highlights the purpose of the project in resolving barriers to quality start-ups, but it does not sufficiently describe who these start-ups are meant to benefit—more specifically, who these students are without options. Data depicting need for the educationally disadvantaged students the application notes were not provided—in composition, volume, geography, or academic need.

Reader's Score: 7

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

Strengths:

Objective 1 is supported by historical evidence of success with opening charter schools (pg. e43). The goal to increase the number of quality schools and proportion of students they serve is specific and measurable. Objective 2 flows underneath Objective 1, and seeks to resolve one of the identified barriers to attaining Objective 1.

Weaknesses:

The application does not address potentially confounding variables that may be leading to new school stagnation. Authorizer tolerance and need for coaching are cited as the reasons for stagnation (pg. e41), but factors beyond control are not considered or stated—such as saturation in particular markets, resource issues in rural or mountainous areas, district-led efforts with traditional public schools, or even policy and regulation barriers that the Department itself may be promulgating.

It is an incomplete assumption to translate the increase in authorizer capacity to an increase in school volume (pg. e99). An increase in authorizer capacity, specifically as it relates to addressing access and equity gaps, would likely yield an equal number of revocations and closures. Additionally, while the application has certainly made the connection between application denial and applicant quality, it asserts that a cause of this is authorizer capacity. However, the application fails to provide the evidence for this connection of causality. Further, lack of new school approval could just as likely be a sign of robust authorizing, and be a reflection of failure in other parts of the sector—such as with the Colorado League of Charter Schools, the organization designed to support and advocate for potential new charter schools (pg. e99).

Further, the relationship between authorizer quality and raising educational outcomes is somewhat indirect. It would not be clear if increases in educational outcomes for charter school students were the result of increased capacity in authorizers; similarly, increased capacity in authorizers may be evident without seeing an effect in student outcomes. A more direct connection would be related to authorizer decision-making; increased capacity would likely lead to measurable changes in new school approvals, revocations, abbreviated contracting, renewals and non-renewals. This objective overall would have low construct validity.

Lastly, the focus on closing the achievement gap is embedded in Objective 2 (pg. e44). It is unclear again how a focus on authorizer capacity in inputs and activities will directly accomplish this stated outcome. To further highlight this disconnect, it could be possible that closure of the achievement gap occurs in Colorado without the stated inputs, activities, and outputs being accomplished.

Reader's Score: 2

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:

Objective 1 is ambitious and attainable; the identified activities related to the subgrant review and award process correspond to the short-term and long-term outcomes. An anchor to a recent study predicting at least 80 new charter schools in Colorado over the next five years was cited as evidence and rationale for the project subgrant goal of 77 applications and 45 awards (pg. e298).

The activities under Objective 1 (pg. e43) are effectively linear and focus on conducting a robust needs assessment that will allow for the offering of needs-based professional development. With a focus on a target audience of charter developers and eligible applicants for replication or expansion, the likelihood of increasing the number of schools in Colorado is high.

The activities under Objective 2 (pg. e45) create some distinction and differentiation between general support for charter school authorizing and an emphatic focus on addressing access and equity challenges for educationally disadvantaged students. This distinction is necessary when laid against the student performance goals of this objective, and also will better allow for some corresponding distinction in program review and adaptation each year.

One source of dissemination of information for eligible applicants is through the Charter School Boot Camp offered each year (pg. e51). This has been a consistent two or three-day event for prospective charter school founders. In addition to this in-person opportunity, the application also details a plan to implement an online resource library. This will certainly help to mitigate barriers to accessing the in-person boot camp or other Denver-centric events for prospective applicants who may experience resource or geographic limitations to attending in-person offerings.

Weaknesses:

Although one of the two primary objectives of the application involves quality authorizing practices, the Schools of Choice unit will research needs, challenges, and best practices through collaboration efforts that do not involve authorizers (pg. e48). In fact, the League, charter school networks, charter school incubators, and other organizations with which it 'has strong relationships' will be consulted. Even if relationships with authorizers are strained, it is unclear why the Schools of Choice Unit (SOC) hasn't pursued collaboration with authorizers or affiliated organizations nationwide. If authorizing is an in-state and growing issue, it is unclear how or why tapping into non-authorizing, in-state resources is an effective solution.

Beyond this, it is not described in the application how community members, from the educationally disadvantaged communities the Department is hoping to reach, will be engaged as part of the needs assessment. If an ultimate objective of the project plan is to increase choice options and improve educational outcomes for these specific student groups (whether in composition or location), it is unclear why the SOC hasn't involved groups or community members to support design and implementation of this project plan.

It is unclear whether the performance target of increasing the number of subcompetition awards for serving underserved populations by two annually is rigorous (pg. e51). Against a background of 50 new schools in 5 years (pg. e72), this number seems extremely low proportionately.

The Objective 1 measure of increasing 4.5% per year the number of students attending quality charter schools lacks some specificity (pg. e72). It is unclear from the description whether the goal is to increase the number of students enrolled in charter schools by 4% (e.g. by about 4,115 students in Year 1) or to increase the number in high quality charter schools as the goal specifically states. If it's the latter, the baseline enrollment of all students enrolled in charter schools neglects the qualifier of high quality, as the application asserts that only 75% of charter schools are categorized

with a Performance rating according to the State's system (pg. e41).

The method and process for determining that an authorizer is improving on NACSA twelve essential practices is unclear (pg. e72). Improvement is not quantified, nor is the method for determining baseline performance in these practices. With so many of the practices being dichotomous (e.g. interview all applicants; grant 5-year terms; require an audit), establishing a sense of quality will either be absent or subjective at best.

An academic gain in ELA and Math of 1 percentage point in Objective 2 fails to consider sample size. Using the baseline figure provided (pg. e72) and assuming average enrollment by grade (91451/13), there are approximately 7,000 charter school students in each grade. Setting a target of 1%, for example, calls for upward mobility of only 70 students per grade. Combined, these targets assert a goal of improving the educational outcomes for only 140 students (4th and 8th grade students) per year. This has an effect on only 0.1% of the charter sector. Over 5 years, that is a significant amount of money (55,171,336.00) to allocate to the tangible benefit of less than 1% of charter school students.

Establishing goals of a .5 percentile increases fails to demonstrate an understanding of percentiles, and the growth model being used. Percentiles are represented as integers, and even assuming rounding, a 0.5 increase may or may not be significant, as the data underlying percentiles are fluid and changing and not representative of even distribution; in some cases, a percentile change of 3-4 may not be statistically significant. With the targets established, the SOC would not expect charter students eligible for free or reduced-priced meals to make the equivalent of one year's growth in one year's time throughout the duration of the grant cycle in Math. These targets also did not include the adequate growth percentiles in the baseline for reference; it cannot be determined from these targets whether surpassing these goals would translate to charter school students attaining or maintaining proficiency over time.

Reader's Score: 12

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:

Colorado charter schools have a history of high performance, even relative to their non-charter counterparts. A majority are categorized as Performance by the state accountability system, and seven of the top ten high schools were charter schools (pg. e58). This historical evidence supports the assertion that charter school programming has a positive impact on statewide educational results for students, and increases the likelihood that the outlined performance objectives will be satisfied.

The process for screening potential applicants is robust, and includes research into affiliations, leadership, and potential conflicts of interest. Beyond the paper-based approach of the application, this level of research really taps into the people-based component of chartering. These activities will serve the Department well in understanding the capacity and needs of prospective applicants in advance of each cycle.

The application criteria have been revised to align to the newly developed standard application for new schools. This both provides consistency in review and reduces duplication of efforts for prospective applicants.

The project plan includes one year without awards in order to engage in preparation activities. These include activities such as a separate Request for Proposals for expansion and replication applicants, separate criteria and rubric for the focused programming subcompetition, as well as time to build out technical assistance. This will ensure not only the preparedness of the Project Team to oversee and manage the grant, but will also ensure that materials and processes are relevant and informed by current events and landscaping.

Weaknesses:

The assertion that the disproportionately high quality of charter schools in Colorado is 'due in part to the strong support system and the high quality subgrant process many of these schools went through' (pg. e58) was not supplemented with evidence. Nothing was provided to directly tie the performance of schools to the processes managed by the SOC. So although there is evidence to suggest a likelihood that charter schools may improve performance statewide, there was not evidence to connect SOC activities—either historical, existing, or proposed—directly to the improvement of educational outcomes.

A budgeting workshop is described that is 'hands-on' and provides 'support in drafting a budget' (pg. e60). It is unclear how the team will ensure they are informing on allowability and compliance, rather than influencing fiscal viability and overall distribution of expenditures. Strategies for preserving autonomy (a feat as important in charter schools as promoting accountability) is not something described throughout the project plan.

Materials have not been revised for specific consideration of expansion and replication applicants. Although there are plans in place to develop these, it makes it difficult to determine whether the criteria and process will be as effective for this pool of candidates as it was for the new school pathway. Additionally, information was not presented around interest in expansion or replications—or success along those pathways to date under prior grants. Evidence such as this would have helped to support both the quality of the applicant pool as well as the ability of the Project Team to recruit and select from that pool.

Reader's Score: 13

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 plan for monitoring is continuous and evolved beyond simple, intermittent checkpoints or check-ins. Building upon historical practice, new plans would involve the aggregation and review of data to identify and supplement technical assistance in a more organic way (pg. e65) based on continuum ratings across recipients. An increased focus is placed on early identification of issues and risk mitigation; this approach is not only more supportive and collaborative in nature, but also more proactive—similar to the medical world, it focuses on prevention and diagnosis with treatment, rather than a simple autopsy.

The plan involves collaboration and data sharing with the authorizer. As the primary oversight agent, partnership with the authorizer will benefit the project plan; in addition to notifying the authorizer and soliciting their support with a situation of noncompliance, the authorizer could equally alert and notify the Department of other school issues or situations that may impact a subgrantee's long-term viability in the grant program.

The application identifies pathways that could be enacted in situations of identified and persistent noncompliance. Heightened monitoring has been developed for schools that are failing to meet goals, and this involves monthly check-ins with the eventual possibility of losing funding if trends are not reversed. Although this is a less pleasant aspect of monitoring, intervention and sanctions are sometimes necessary to ensure good stewardship of public dollars.

The application outlines several methods for reducing duplication in efforts for both authorizers and charter school applicants throughout the course of the project plan. Examples include alignment to the new school application in criteria and evaluation, as well as internal collection and maintenance of data where needed to avoid requests of the school or authorizer over time (pg. e65).

Weaknesses:

The application states that trainings developed are based on 'research-proved best practices' (pg. e69). This assertion is not supported with citations or information about the research used to develop or determine their effectiveness.

Although the applications speak to intent on building relationships as a strategy for accomplishing its objectives (pg. e69), the process for building these relationships was not described. This gap between intent and plan or practice makes it difficult to discern the potential effectiveness of this outlined strategy in the state plan.

Technical assistance for authorizers relies upon an annual summit for authorizer collaboration (pg. e70). Although this can be a good platform for relationship building, the application admits that frequency and location is an impediment to ongoing work in this area. It also notes that the Colorado Association of Charter School Authorizers (CACSA) is working to address this; it is not clear what the direct or indirect role of the Department is in this work.

Reader's Score: 17

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: 7

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:

Each activity identified through the plan objectives are details in this section of the application with sub-component descriptions of how each activity will be accomplished (pg. e73-77). These sub-components include information on the person or partners involved, as well as the timeline for which they will occur.

Weaknesses:

The responsibilities and timelines lacked specificity. With such broad clusters of personnel and several months affiliated with many of the items, it made it difficult to determine how reasonable the management plan was. Several activity buckets could have been broken out into multiple subcomponents. For example, when activities were generic (e.g. professional development) and spanned an entire year (e.g. June 2018-June 2019), it could not be determined whether or how these would be monitored or measured for milestones (pg. e52).

Many of the activities focused on the output of the activity, and neglected to consider the design and prep time needed to generate the output. For example, one item referred to scheduling, organizing, and conducting an Annual Business Manager Conference (pg. 52). The timeline for this simple said 'Annually in September.' This only considers the day of the event, and not the time that may be needed to secure a venue, advertise, coordinate presentations and/or content, and develop materials as necessary.

Sub Question

Reader's Score: 4

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:

Many of the subcomponents are identified with a single owner and affiliated with a short timeline. In these situations, there is clear alignment to the activity and overall plan objective. Additionally, specific personnel are identified in the budget narrative, and corresponding resumes are provided that highlight the experience and expertise of the Project Team (pg. e85-91).

Weaknesses:

While the management plan provides robust and stepwise plans for implementing the identified activities using the identified objective inputs, the responsibility designations are not specific (pg. e85-91). In most cases, several positions are affiliated with each activity. This makes it difficult to determine who is the owner versus who may simply be consulted, as well as who is specifically tracking and monitoring to ensure on-time implementation.

With so many activities spanning full years (such as professional development, which spans June 2018 to June 2019, for example), it was difficult to garner an understanding of month-to-month activities that could determine whether staffing and personnel are appropriate and adequate to meet plan objectives.

Lastly, the budget narrative (no epage numbers listed in this appendix) notes more than \$400,000 in anticipated salaries and more than \$260,000 in related expenditures during the first year of the project. This is a significant amount of funding that lacks specificity in plan details. It is difficult to determine whether the time commitments and affiliated costs of the four FTE and consultant are adequate or appropriate without additional details provided in the management plan for Year 1 activities.

Reader's Score: 3

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:

One specific criterion for a new charter school application involves parent involvement and the requirement that a sufficient number of parents support the formation of the school (pg. e78). Additional application criteria seek ongoing opportunities for parent engagement and notification of performance in order to assess the school's plan to provide for these things following approval.

The proposal also involves activity plans that specifically seek to collect and report on parent input in the implementation and operations of charter schools (pg. e79).

Although not charter-specific, the State also has several methods and opportunities for parents to provide input into the education of their students—including the presence of a School Accountability Committee required for each school and parent feedback opportunities and reviews of each school's annual Unified Improvement Plan (UIP).

Weaknesses:

Much of the information provided references opportunities for parents to provide input and feedback to their school—both in foundation and in operation. The application also references how some of these feedback loops reach the authorizer, as they are required review components for a new school application and annual Unified Improvement Plans. However, it was unclear in this section of the application how the State has specifically solicited or considered input from parents and other community members to date. It is unclear whether the State taps into these school and authorizer/district-level

methods, and if so, what has been done to date with the information. And although plans exist to build this opportunity in under the proposed grant project, specific details around that process (format, timing, frequency, method of dissemination, utility) have not been developed and were not discussed in draft.

Despite the focus on educationally disadvantaged students in the project plan, this section of the application failed to emphasize or focus on parent and community involvement in a way that corresponds to the access and equity objectives of the application. All methods for parent input were general, and did not consider existing barriers in resource or geographic for many parents and communities in the state.

Reader's Score: 6

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 State of Colorado outlines both a practice of granting automatic waivers to charter schools, as well as a process for allowing charter schools to request individualized waivers from other portions of law in alignment with their specific model and program plan (pg. e80). This process involves a charter presenting a replacement plan that ensures they satisfy the intent of the law, but grants significant flexibility in the method for doing so. This support and preservation of charter school autonomy is both efficient and admirable. The Department also provides resources and guidance around statute that is waivable (such as personnel and hiring) and that which is non-waivable (such as state testing); this likely helps unfamiliar charter schools navigate the design and implementation of their unique programs and operations.

Weaknesses:

The process for granting waivers requires approval and submission to the State by the charter authorizer (pg. e81). This lack of direct accessibility to requesting flexibility may be impacted by authorizer quality or tolerance. Because additional information was not provided in the application to validate the success of the requested waivers to date, it is unclear how these opportunities have translated to actual or maximized flexibility.

Reader's Score: 4

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:

Charter schools receive 100% of the residing district per pupil revenue (pg. e23). In addition to this per pupil equity, the State of Colorado also passed legislation in 2017 that gives charter schools access to local mill levy funding. Combined, these serve to ensure that charter schools have comparable resources to their neighborhood schools.

In addition to this base funding, Colorado also has statute that mandates a proportionate share of money generated under federal or state categorical aid programs shall be directed to charter schools (pg. e24).

The application also includes information as to how it ensures equity in the implementation and practice of these outlined requirements. This is done through technical assistance that is focused on ensuring charter schools both understand financial allowances, as well as requirements. Subgrant applicants must identify both their anticipated composition and

respond to criteria around requirements for these grant programs through the application and start-up processes.

The State also has robust financial transparency requirements for both authorizers and charter schools. Further, in a situation of dispute over receipt of funding, charter schools have the right to appeal decisions or request investigations by the State Board of Education (pg. e24).

Weaknesses:

No weaknesses found.

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 state manages a Capital Construction Fund, which provides charter schools with funding for facility construction, renovation, financing, and the purchasing or leasing of facilities (pg. e25). This is established through law, and allocated on a per pupil basis, which yields a strong and consistent platform and method to ensure this charter school support. Further, a portion of these funds are pooled through the passage of the excise tax revenues from the marijuana legislation, which resulted in the increase of \$25 million to this funding stream.

Beyond this primary funding source, charter schools also have access to grant programming specific to charter schools through the BEST Grant program (pg. e26). This grant program also sees some of its revenue through other state sources, including marijuana and lottery taxes, which ensure some long-term reliability and sourcing.

The State also requires districts to annually publish a list of available facilities—either those that are unoccupied, or those that are underutilized (pg. e27). Charter schools may then request to use those facilities. Districts must also allow the use of vacant or eligible district facilities and may not charge rent for those specific district facilities under law.

Weaknesses:

The magnitude and breadth of the success of the facilities initiatives in the state could not be determined from the information provided in the application. For example, although the application states that 'recent analysis confirms' funding is equitable as it pertains to the supplement of BEST funding (pg. e26), figures and information around this analysis were not provided to validate the information. Instead, the information provided in the application is anecdotal at best, even referring to two case studies of success highlighted on the BEST website, but not included in the application. Without knowing the number of charter schools, as well as those eligible and those awarded, it is difficult to determine the extent to which the summarized programs effectively allow for facilities access and equity.

Eligibility for supplemental facilities funding was unclear in the application. It is noted that BEST funds require a match, making it unclear how difficult this is for new or grassroots startups to access. Additionally, the facilities bond opportunity notes that the 'project list has grown to include charters' (pg. e26) and notes a requirement that applicants must have 300 students and be operating for at least 3 years. This again makes it difficult to discern whether these barriers to eligibility disproportionately favor particular models, sizes, and locations.

Although charter schools have access to vacant or underutilized facilities, it is unclear if there is any recourse for district refusal for access (pg. e27). In situations where districts are hostile towards charter schools, requiring only a written rationale for denial may create barriers in several regions of the state for charter school start-up or location.

Lastly, the letter of support from the statewide authorizer (pg. e97) and one of the rural high schools (pg. e127) highlights the problems with charter school access to facilities and funding for facilities, making it further unclear how successful or viable existing opportunities are.

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:

As a strategy for turnaround, the application highlights a case study wherein a district-run charter school with chronic low performance was replaced by a charter school affiliated with a charter network that had a track record of success. In a single year, the scores of at-risk students were raised by more than 30 percentage points (pg. e30).

Weaknesses:

Other than the single case study example of a charter network turnaround effort, the application fails to address how the State uses best practices from charter schools to help improve struggling schools and local educational agencies. Further, the information provided on the case study (pg. e127) reveals that the turnaround effort involved a charter network replacing a failing charter school; this again is not necessarily evidence of how the State has used best practices from charter schools to improve other schools and LEAs. The information provided also made it difficult to determine how successful the turnaround effort was—detail was not provided on the proportion of students that stayed with the school, the duration of time used for restructure, which scores specifically increased, who is defined under at-risk students and how those scores compared to schoolwide results.

It is unclear how the pathway for a struggling traditional school after five years of persistent noncompliance and chronic low performance involves conversion to a charter school, especially considering the application assertion that increased autonomy is provided for schools and districts that meet state expectations (pg. e28). This would have the potential to impede sector performance, promulgate low performance, and thrust increased responsibilities in programming and operations on to an administration that has already demonstrate low levels of capacity.

Rules regarding persistent low performance also require five consecutive years on Priority Improvement or Turnaround (pg. e28). A school could still rest well within the bottom quartile of state performance for years and remain unaffected. Additionally, a school in Priority Improvement or Turnaround could earn a single Improvement rating once during a 5-year span (which may equate to performance only around the 15th or 16th percentile statewide, for example), and have their proverbial clock restarted.

Reader's Score: 1

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:

Incentives are outlined in the application that are specifically aimed at increasing charter school service to at-risk populations (pg. e32) These include increased point in subgrant applications for the use of a weighted lottery, as well as increased points for schools that could not utilize a lottery but were intentional in high degrees of service to educationally disadvantaged students. Additional funding is being proposed through the project plan to allocate increased monies to applicants that meet service criteria around serving higher proportions of traditionally underserved populations.

Weaknesses:

Much of this section of the application describes efforts being undertaken by the Colorado Department of Education to improve education for historically underserved students, rather than demonstrating the extent to which it supports charter schools that serve at-risk students. For example, the State's strategic plan is cited, as is charter participation in other statewide efforts—including an alternative education campus task force, trainings charter schools can attend, and technical assistance the Department provides around at-risk service that charter schools could access (pg. e31-32). In each of these examples, charter schools can certainly participate (or were even asked to participate), but none of these efforts were charter-specific.

Some strategies outlined in the application are for future implementation—including additional funding for higher rates of at-risk service, as well as an additional staff member in the Schools of Choice Unit who will lead task forces to address access and equity areas of deficiency in the charter sector (pg. e32). Although these will likely be beneficial, the rubric specifically calls for a demonstration of the extent to which it currently supports charter schools, rather than how it intends to support charter schools serving at-risk students in the future.

Lastly, the rubric topic areas of dropout prevention, dropout recovery, and comprehensive career counseling services were addressed only in the context of statewide resources (pg. e32), and were not charter specific. Considering the increased operational and programmatic requirements that charter schools inherit with the privileges of autonomy, it is unclear whether statewide resources on topics such as dropout prevention are sufficiently applicable.

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 outlines the adoption of Standards for Charter Schools and Charter Authorizers (pg. e13) which guides and standardizes expectations of authorizers, as well as oversight criteria in situations where there is review of a district's exclusive chartering authority. Beyond this, several areas of law also govern minimal standards that must be adhered to along the essential practices of authorizing—this includes annual school review processes, minimal criteria that must be reviewed in new school applications, components that must be included in a legally-binding charter contract, as well as open meeting and record laws. Combined, these ensure some comparability in quality of practice, but also allow for the individualization necessary in a local control environment like Colorado.

Weaknesses:

It is unclear how the practice of Exclusive Chartering Authority creates best practices in authorizing (pg. e22). If districts can deny both an application, and the applicant's ability to apply to the statewide authorizer, it can unintentionally incentivize poor practice. Further, although an applicant can challenge the exclusive chartering authority of the district, it is unclear where an applicant would generate the resources, time, or even political support in some cases to initiate or undertake such a process through the State Board of Education.

Inversely, it also seems as if the process lacks regulation if an authorizer's chartering authority can be threatened based upon a complaint of a school in its portfolio. This could equally incentivize poor practice on the part of the charter school, if threats of intervention, sanction, or closure can be retaliated against.

The application states that an authorizing district must demonstrate a recent pattern of providing fair and equitable treatment to its charters in order not to be at risk (pg. e34) for intervention. However, a process of review of this information was not described in the application. It is unclear whether this occurs regularly as a way to ensure ongoing best practice or continued improvement.

Although the application describes the Colorado Association of Charter School Authorizers, and its peer-based approach to authorizer accountability (pg. e39), this reads as an independent authorizer-initiated organization. The rubric specifically seeks the extent to which the applicant has taken steps to ensure best practices are implemented.

Further, a later section of the application outlining need for the project plan references an authorizer barrier in opening new schools (pg. e41)—'authorizers shifting to take a less supportive position with high potential charters that have weaknesses in their application' is described as one of three 'challenges' facing Colorado charter schools today. If the Department believes these are quality applications or applicants that are being mishandled by authorizers (either as a result of denial or by lack of provided technical assistance), it suggests misalignment in either philosophy or ability between agencies; either way, this is a significant opportunity for support and/or intervention for authorizers by the Department that is going unfilled.

Reader's Score: 3

Status: Submitted
Last Updated: 06/12/2018 04:07 PM

Status: Submitted

Last Updated: 06/12/2018 04:07 PM

Technical Review Coversheet

Applicant: Colorado Department of Education (U282A180023)

Reader #2: *****

	Points Possible	Points Scored
Questions		
Selection Criteria		
Quality of Project Design		
1. Project Design	15	11
Objectives		
1. Objectives	20	13
Quality of Eligible Subgrant Applicants		
1. Subgrant Applicants	15	13
State Plan		
1. State Plan	20	15
Quality of the Management Plan		
1. Management Plan	15	9
Parent and Community Involvement		
1. Involvement	10	6
Flexibility		
1. Flexibility	5	3
Sub Total	100	70
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	1
Sub Total	3	1
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	3
Sub Total	5	3
Total	123	86

Technical Review Form

Panel #3 - Panel 3 - Colorado - 1: 84.282A

Reader #2: *****

Applicant: Colorado Department of Education (U282A180023)

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: 11

Sub Question

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

Strengths:

With the noted potential to open 80 new charter schools over the next 5 years, the applicant states all aspiring schools will have access to start-up coaching and support through their department of education indicating support and assistance to all potential charter applicants not just those funded as subgrantees. This correlates directly to activities, outputs, and outcomes depicted on the wire chart portion of the Logic Plan on page e47. The top 45 new or expanding charter applicants will receive a sub-grant under this program in addition to coaching and technical assistance that will exceed the level of support provided to all potential charter applicants.(page e42).

Additionally, the applicant has identified the need to continue the State's great strides in opening charter schools that prioritized serving populations with historical achievement gaps and working to close those gaps (page e42). Access to the start-up coaching and support mentioned above to all potential charter applicants will help facilitate this growth regardless of the status of their subgrant status. To further help this growth, a focus will be placed on activities related to research, new school development, authoring practice, and technical assistance to increase the equity in access to high quality school choice options (page e42).

In support of the charter school growth over the next 5 years the applicant has proposed to expand its charter pipeline, build leader and developer capacity, strengthen authorizer practice, and ensure access and equity (page e43). The identified charter school growth is based on the applicant's 25 year history of charter school growth, taking in to consideration of the recent challenges to growth, and the projected charter school pipeline research identified in Appendix F.7, beginning on page e298, demonstrating a clear rationale.

Weaknesses:

Although, the rationale for the program was to seek improvements in statewide achievement and close the achievement gap by making greater investments in the charter sector, it did not address how success would be measured. Additionally, the rationale for the need of new and expanding scores, including students in rural communities (page e41) is not supported by a documented or research-based need.

Reader's Score: 7

Sub Question

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 has provided an adequate description of the outcomes and goals of their program. Its identified goals and objectives (page e42 & e43) include:

- Improving statewide achievement and closing the achievement gap by making greater investments in the charter sector.
- Expanding the charter school pipeline, specifically with high quality charter developers that are likely to be successful.
- Building capacity among charter school developers and leaders to ensure readiness and likelihood of success when replicating or expanding charter schools.
- Strengthening authorizer practice to support high quality charter schools
- Ensuring access and equity to all students.

The goals and objectives outlined in the project design provide adequate detail to support their reasonableness and achievability.

Weaknesses:

Although goals and objectives were identified, the outcomes lacked an identifiable method or definition of measurability. Measurability of the outcomes was partially addressed later in the application through the management plan, however, the identified objectives are not clearly represented by the alignment of activities to the expected outcomes graphically depicted on page e47.

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 goals and objectives outlined in the project design provide adequate detail to support their reasonableness and achievability.

The presented logic model identifies key assumptions and inputs and addresses them (page e46) with performance measures directly related to each of their 2 objectives. The second page of the logic model maps the inputs to activities leading to outputs that progress to short medium, and long-term outcomes (page e47).

The narratives description of objective 1 "Increase high quality charter school options and the number of students who attend them", provides an ambitious outcome and is support by mapping it to clear activities to develop a quality charter school program that focuses on readiness of the developer through Activity 1.1 and capacity building though activity 1.2 (pages e48 and e49). In support of Objective 1, the applicant will not run a subgrant program competition until fall of 2019, instead focusing on the Activities 1.1 and 1.2 to ensure charter school developer pipeline has potential subgrantees with the capacity for success prior to the competition (page e52). This further increases the likelihood of success.

For objective 2 the applicant will spend the first year of the grant as a planning year to evaluate the quality of their own resources, trainings, and technical assistance to make timely revisions and updates to best support both charter schools

and authorizers (pages e54 & e55), thus developing a baseline from which the applicant can implement the associated activities and deliver on the outcomes in years 3 -5 of the grant.

Overall, the 2 identified objectives are sound and feasible, based on the clearly defined activities and associated performance measures. The clearly identified activities are likely to increase the likelihood of success within their charter school program and lay the ground work for future growth of quality charter schools prepared to close the achievement gap.

Weaknesses:

Although the applicant provides a clear alignment of activities with the defined objectives, the identified outcomes are neither ambitious nor fully developed. Examples of this include measure 1H (page e72) “to increase the number of subgrants for serving underserved populations,” is further identified as only an increase of 2 annually. Measure 2F (page e72), “to increase the median growth by 0.5 percentile point annually” serves as another example due to the insignificance overall. Given the size of the applicant’s charter school population, these are not ambitious outcomes. Additionally, it is likely that the proposed activities on pages e71 and e72 will produce outcomes that are not defined in the narrative and will likely negatively impact the likelihood of success.

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:

Through the activities defined in (b), and referenced under (c), the applicant has a robust process to provide coaching and technical assistance to potential subgrantees prior to application for a subgrant (page e58). This also includes statewide analysis and outreach to identify needs and best practices prior to the subgrant application launch.

The state entity’s pre-applicant review allows for eligibility and quality concerns to be addressed prior to submission allowing (page e59) for technical assistance during the application process to focus on topics that are likely to impact student success and result in a high-quality charter school.

The applicant provided a draft of its proposed subgrant RFA which aligns with the narrative provided in this section.

Weaknesses:

Although the applicant has a well-developed plan for addressing subgrant applicants, a significant portion of the technical assistance addressed is through hands-on development workshops (page e60) related to drafting an eligible expenses budget and well-developed plans to meet the grant’s objectives and outcomes. The level of involvement the applicant described as hands-on may skew the perception of quality in a subgrant applicant.

Reader's Score: 13

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 identifies a three-part process for monitoring eligible subgrantee's. The applicant refers to this as a continuum rather than isolated checkpoints. (page e65). The focus is on early intervention and sustainability. The applicant also provides for the potential required reallocation of subgrantee funds by the subgrantee to address areas of identified underperformance (page e65).

To avoid duplication of work, the applicant proposes to gather any need data through routine data collection to minimize additional data reporting burdens (page e68 & e69). Additionally, the applicant referenced including charter school authorizers throughout the three-part monitoring continuum (page e65).

The applicant addresses its plan to provide technical assistance and provide support to subgrantee's and authorizer's extensively under section (b) including needs based professional development and coaching for charter operators, (c) with the use of a preapplication letter of intent to help address eligibility and quality concerns with potential subgrantees, and (d)noting the CACSA hopes to begin presenting directly to school boards on training, shared resources, and to encourage the adoption of a renewed commitment to NACSA's Principle and Standards of Quality Authorizing.

These above identified elements of the narrative provide evidence of a well-developed plan to achieve the criteria to monitor eligible subgrant applicants, reduce duplication of work, and provide technical assistance to both subgrantees and authorizers in the state.

Weaknesses:

In an effort towards the elimination of duplication, subgrantees will be encouraged to use information that can be obtained from the authorizer's annual report to fulfill certain monitoring requirements (page e69), however, it is not clear that the authorizer annual reports will align with the requirements of the CSP grant program.

Although the State Plan discusses the work that will be done around quality authorizing efforts referencing trainings that will be based on research-proven best practices (page e69), it neglects to identify what research the applicant references or examples of best practices that will be used. Additionally, much of the authorizer technical assistance relies on the quarterly authorizer meetings and annual Authorizers Summit (page e70). This dependence is concerning as only 12 -15 of the 45 authorizers regularly attend (page e70 equating to 26 to 33% of the authorizers in the state).

Reader's Score: 15

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:

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 provides an adequately developed management plan that begins with a defined performance plan (Table 1, page e71 & e72) which identifies robust performance measures, associated baseline data, and performance targets aligned to each of the defined plan objectives and their associated activities. An example of this is on page e72 with performance measure 1c "(GPRA): Number of charter schools in Colorado" with a baseline of 250 for 2017-18 and performance targets of 260 for 2018-19, 270 for 2019-20, 281 for 2020-21, 292 for 2021-22, and 300 for 2022-23."

To prepare for the implementation of the identified plan the applicant identifies temporary capacity with the hiring of a Charter Field Consultant to support planning year activities in preparation for the subgrant process in fall 2019 (page e71). Additionally, the applicants referred to an RFP process to select and contract with external providers who will implement support and development activities throughout the grant period (page e71).

The applicant provided a detailed work-plan identified as CCSP Management Plan (Table 2, page e73 – e77) which identifies specific tasks and deliverables with assigned staff and timelines for completion or recurrence that support the previously presented Performance Plan.

Weaknesses:

Throughout the narrative, the applicant referenced collaboration with various organizations, experts, and associations. It is encouraging to collaborate with external stakeholders throughout the grant process, however the RFP process mentioned for selecting formal participation (page e71) was lacking the same level of clarity and thorough description provided in other narrative elements of this application.

The Management Plan does not adequately describe the timelines and milestones for planning year (grant year 1) to support the activities and outcomes as presented on page e47. Specifically, the plan is lacking any reference to the year one activities that include parent and community involvement in the needs assessment.

Additionally, the Management plan provides a list of job roles for each milestone, however it is lacking clearly defined responsibilities or owners for each milestone. An example of this the first milestone under Activity 1.3 on page e73 which is "Schedule/organize/conduct/record CCSP Grant Boot Camp training" listing the Executive Director, Grant Manager, Charter Technical Assistance Lead, and CSP Program Assistant but doesn't define who is the responsible owner for this task.

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 has provided a substantive plan for the use of project personnel through a defined FTE staffing needed and additional support provider from charter support providers. Detailed FTE breakout is provided in the budget narrative (after page e338) and referenced on page e77. The calculations and definitions provided are adequate and appropriate time commitments. Together these demonstrate support for the management plan submitted and staff's ability to deliver on the objectives.

Sub Question

Weaknesses:

Although the plan presented outlines the use of project personnel, the detail or costs and personnel presented in the budget narrative (after page e338) do not align with the milestones and activities presented in the plan or earlier narrative sections with 2018-19 as a planning year.

Additionally, as mentioned previously, the Management plan provides a list of job roles for each milestone, however it lacks clearly defined responsibilities or owners for each milestone making difficult to determine the complete adequacy of the time commitments identified in the FTE breakout.

Reader's Score: 3

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 identifies how parents and members of the community are involved in education from a statutory basis (page e78) for both schools in general and charter applications specifically.

The applicant further identifies how the community will be involved in the subgrant and places the solicitation of this information primarily in the subgrant application (page e79).

Weaknesses:

Although parent and community involvement is provided in general, the applicant has not adequately identified how it will be solicited and considered. This is particularly concerning as the entire first year of the grant will focus on a review and improvement of practices prior to subgrant launch in the fall of 2019. The applicant specifically references Activity 1.1 (page e79) to solicit and consider input, however, the plan for how they will solicit and consider input from parents and community members. The only commitment referenced is that any parent and community feedback will be publicly reported (page e79).

Reader's Score: 6

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 defined the flexibility given to applicants in their state as provided under state law (page e80) that gives them autonomy over their school's operations and funding. Additionally, there is a process for a charter school to apply to the state for additional waivers from state statute and state board rule to gain additional flexibility (page e80 & e81).

Weaknesses:

Although, the state provides for flexibility in statute for most operational concerns and has a process for additional waivers for increased flexibility, charters are dependent on their authorizer to waive additional district-level policies and certain state statute and state board rules (page e80). This requirement to seek approval from their authorizer for additional waivers is restrictive, resulting in limited flexibility that is inconsistent with the flexibility granted at a Statewide level.

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 demonstrates equitable financing of charter schools through detailing funding equity on page e23 referencing legislation that mandates 100% of the district per pupil revenue less up to 5% for actual and itemized administrative costs. Further, the application references additional legislation that provides for the same 95% or greater for a local mill levy override funding (page 23)

Additionally, the applicant has been considered a national leader in providing equitable funding to charter schools by the National Alliance for Public Charter Schools in their 2018 State Public Charter School Law Rankings (Page e23).

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 has provided an extensive description of the opportunities for charter schools to access facilities funding through the Charter School Capital Construction Fund (page e25), Building Excellent Schools Today Grants (page e26), and Colorado Education and Cultural Facilities Authority, CEFCA, (page e25). Specifically, it provides for a "moral obligation" from the state to repay bonds to increase investor confidence and lower interest rates.

Additionally, in situations where a district allows the charter the use of a district facility, the charter school may not be charged rent (page e27).

Weaknesses:

Although the applicant has specified how charter schools have access to equitable or low-cost facilities, they have confusing, and potentially contradictory statements related to the mandate that districts invite charter schools to participate in Bond questions (page e27), while they only encourage each district to include funding for capital needs of charter schools (Page e28). Additionally, Colorado law requires districts to annually publish an inventory of available vacant or underutilized buildings or land (page e27) providing charters with the ability to request the use of these facilities or land. However, a district may deny this request for use by providing written notice to the charter school at a public meeting. The applicant has not defined the conditions or limits on denial or a process to appeal the denial (page e27) resulting in the applicability of this provision as vague and potentially contradictory to the feasibility to use district facilities.

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:

Through the narrative, the applicant reasonably identified how their state uses Charter Schools as a tool to help improve struggling schools by specifically noting their turnaround strategy (page e28 and e30). The turnaround strategy is used when state and local authorizers solicit charter operators to replace struggling schools on the Accountability Clock (page 330) The applicant identifies that Charter Schools are subject to the same Education Accountability Act of 2009 (page e28). If additional action is directed to be taken by the State Board of Education, action may include school closure, conversion to a charter school, or takeover by an external management company.

Weaknesses:

Although the applicant's narrative identifies "Charters as a Turnaround Strategy" (page e30) where state and local authorizers solicit charter school operators as part of the school turnaround strategy, it does not provide evidence of how best practices from charter schools will be used in struggling schools outside of the turnaround strategy. Without the identification of additional uses of best practices, the narrative is limited without articulated evidence of success

Reader's Score: 1

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 provided adequate descriptions of how it supports charters schools that serve at-risk students. A key initiative to "expand access and opportunity for historically underserved students" (page e30) is identified as part of the applicant's strategic plan. This initiative identified partners that can be connected to charter schools serving a larger proportion of at-risk students.

The applicant identified various training opportunities to further support districts and schools, including charters, with a focus on serving at-risk students (page e31). Additionally, charter schools are eligible to apply for supplemental funding, separate from this grant program, to serve at-risk students ensuring that charter schools able to provide services that are

equitable to those offer by their traditional public school peers.

Weaknesses:

Although, the applicant’s narrative was adequate it was not fully developed. The applicant references its key initiative (page e30), noted above as a strength, however based on the description provided, it appears the applicant Schools of Choice Office only connects partners with charters serving a larger proportion of at-risk students potentially leaving charters with lower proportionality without support.

The applicant referenced its Alternative Education Campuses, AEC, which are defined as schools serving at least 90 percent of students identified as having one or more high-risk indicators (page e31). AECs receive additional support from the Schools of Choice Office to ensure they are fully accessing applicable state and federal supports for dropout prevention, dropout recovery, and comprehensive career counseling. Currently 22.7 percent of AECs are charter schools serving 44 percent of the AEC population, however, the applicant does not how non-AEC charters schools have access to the same supports. This action also potentially leaves charters serving a lower proportionality of students with high-risk indicators without the supports to be successful.

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 documented an extensive process for implementing best practices in charter school authorizing through the identification of several best practices to be monitored by charter authorizers (page e33) including school performance data, school financial practices, and periodic monitoring. These are further defined by the applicant under “Holding Charter Schools Accountable” on page e35 – e38.

Additionally, the applicant identified the process in which authorizers are held accountable and how an authorizer may lose its right of exclusive chartering authority (page e34).

The applicant has participated in the formation on the Colorado Association of Charter School Authorizers, CASCA, with a focus on growing authorizers, encourage improvement of mature authorizers, and provide support for all authorizers (page e39).

Weaknesses:

Although the applicant outlined how the implement best practices, where a school district LEA has Exclusive Chartering Authority (ECA), the ECA must grant a waiver for petitioners to appeal their application to the Department of Education (page e22). ECA’s are granted when they “show a recent pattern of providing fair and equitable treatment to its charter schools” (page e22). This ECA allows for the possibility of questionable authorizing practices prior to the loss of ECA without the right of appeal.

Reader's Score: 3

Status: Submitted

Last Updated: 06/12/2018 04:07 PM

Status: Submitted

Last Updated: 06/12/2018 04:07 PM

Technical Review Coversheet

Applicant: Colorado Department of Education (U282A180023)

Reader #3: *****

	Points Possible	Points Scored
Questions		
Selection Criteria		
Quality of Project Design		
1. Project Design	15	11
Objectives		
1. Objectives	20	13
Quality of Eligible Subgrant Applicants		
1. Subgrant Applicants	15	13
State Plan		
1. State Plan	20	17
Quality of the Management Plan		
1. Management Plan	15	7
Parent and Community Involvement		
1. Involvement	10	7
Flexibility		
1. Flexibility	5	3
Sub Total	100	71
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	1
Sub Total	3	1
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	88

Technical Review Form

Panel #3 - Panel 3 - Colorado - 1: 84.282A

Reader #3: *****

Applicant: Colorado Department of Education (U282A180023)

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: 11

Sub Question

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

Strengths:

The application includes an adequately developed response establishing rationale for the proposed project by describing the state's past accomplishments, current challenges and opportunities, and future goals for the charter sector (pp. e40-43). The state boasts several accomplishments over the past 25 years: there are 250 charter schools; charters serve 13.5 % of the state's K-12 public student enrollment; charters serve a higher percentage of minority and English Language Learner (ELL) students than do traditional public schools; and these students outperform their traditionally-schooled peers in Language Arts and Math at fourth and eighth grade levels.

While the application highlights existing strengths of Colorado's charter sector, it also identifies new challenges facing charter schools and authorizers as rationale for continued federal CSP funding. Challenges include scarcity of affordable facilities, a leveling -off or decrease in Colorado's overall K-12 student population, and increased scrutiny of authorizers in making charter school application decisions. The applicant presents these challenges as need for more support early in the charter school start-up and expansion process (pg. e40).

Additionally, CDE will provide quality coaching and support to all aspiring new charter school developers and schools to successfully navigate the increasingly rigorous new charter school application and start-up process. Successful new and expanding charter school applicants will also receive multiple years of funding under state's federal CSP subgrant, additional coaching, technical assistance, and training to support their success (pp. e41-42).

CDE will work with state partners such as The Institute and key authorizing districts to recruit and build an ever-growing authorizer practitioner network to increase the likelihood that best authorizing practices are consistently applied across the state (pg. e42). The federal CSP grant will position the SOC to continue to fund and support existing collaborations with state partners that foster the adoption of authorizer best practices.

Finally, the applicant proposes to leverage the CSP grant to support statewide efforts to increase enrollment of educationally disadvantaged and historically underserved populations in high quality charter schools. This focus on equity will include grant-funded activities related to research, new school development, authorizing practice, and best practice implementation (pp. e42-43).

Sub Question

Weaknesses:

While the application identifies the aforementioned indicators as rationale for the quality of its proposed project design, it is unclear how the project's logic model is specifically informed by comprehensive research or evaluation findings or how the challenges and opportunities presented in the application are likely to realize outcomes included in the logic model (pp. e46-47).

Reader's Score: 7

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 presents a well-developed response articulating proposed project goals, objectives, and outcomes to be achieved that are clearly specified and measurable (pp. e43-45). The applicant's first objective, "Increase the number of high-quality school options and the number of students who attend them," focuses on providing support, coaching, and technical assistance to developing, new, and expanding charter schools to increase their likelihood of being approved and selected for federal CSP funding. The second objective, "Raise educational outcomes for all charter school students by increasing capacity among authorizers and charter school leaders to increase quality charter school programs and to successfully address access and equity gaps among educationally disadvantaged students," seeks to improve authorizer capacity and effectiveness and bring together state stakeholders to address parental choice, closing equity gaps, and expanding access to high quality programs for educationally disadvantaged students.

Weaknesses:

While the proposed project includes goals, objectives, and outcomes that are specific and measurable (pp. e43-47), a compelling correlation is lacking between proposed objectives and outcomes (i.e., measurable performance targets, pg. e46). For instance, under Objective 2, it is unclear how an increased rate/number of approved charter school applications by authorizers will specifically result in increased proficiency of 4th and 8th grade charter school students in English Language Arts and Math

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 presents an adequately developed response describing its logic model for proposed project objectives that includes: 1) key assumptions; performance measure summaries for each of the two objectives; 2) objective inputs, activities, and outputs; and 3) short-term, medium-term, and long-term outcomes (pp. e46-47). The logic model is followed by comprehensive descriptions of activities under each objective summarizing how the applicant will implement a quality charter school program and how project objectives will be carried out. (pp. e43-58).

The proposed project objectives appear reasonable and moderately ambitious for running a quality state-entity federal CSP grant project. Objectives, activities, inputs, outputs, and outcomes are aligned with application requirements (1)(A)-(G), support the applicant's responses to Competitive Preference Priorities, and specifically describe the applicant's plan for running a quality charter school program.

Key activities under Objective 1: 1) begin with research on opening, expansion, and replication of high-quality schools and parent and community engagement; 2) includes authorizer- and charter-specific professional development and training; 3) indicates plans to run an annual subgrant competition beginning fall of 2019; and 4) monitoring subgrantees through the life of the grant to promote progress, manage risk, and high-quality schools (pp. e48-52).

Key activities under Objective 2 include: 1) targeted support and technical assistance for charter school authorizers that emphasizes authorizers' role in increasing student equity; 2) targeted support and technical assistance for charter schools that includes governance, finance, and operations training; 3) hosting annual "Equity Convenings" of charter schools, authorizers, and other stakeholders to identify solutions to help close education and opportunity gaps; and 4) expanding its Professional Learning Communities (PLC) of charter school personnel on topics such as Multi-Tiered Support Systems, Exceptional Student Services, Dropout Prevention, Transportation, Federal Programs, Accountability, Community Partnerships, and School Finance (pp. e52-58).

Weaknesses:

While the application includes a comprehensive description of project activities, the ambitiousness of proposed objectives is not sufficiently established. For instance, the applicant is requesting funds for 45 new subgrant awards over the life of the grant (budget narrative); however, performance targets (pg. e72) indicate only awarding two subgrants per year for serving underserved populations. That number is extremely low given the fundamental focus and emphasis of the applicant's proposed project is addressing equity and access challenges for educationally disadvantaged students (pg. e43).

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 presents a well-developed response describing its multi-pronged strategy to help ensure high-quality applicants are selected for federal CSP funding. Specific efforts contributing to the likelihood that selected subgrantees will meet project objectives and improve educational results for students include: 1) statewide analysis and outreach; 2) coaching and technical assistance for applicants; 3) technical assistance during the grant-writing and application process; 4) clearly specified selection criteria aligned with the new Colorado Standard Application to promote consistency between the state charter and federal CSP grant processes; 5) a rigorous peer review of applications; and 6) updated CSP subgrant request for proposals (RFPs) for new, replicating, and expanding charter schools aligned with the priorities, goals, and objectives of the applicant's proposed CSP project (pp. e58-63).

Further, the applicant will take the first year of the grant project to develop, refine, and implement the above strategies into an improved subgrant selection process designed to specifically increase the likelihood that selected applicants will meet project objectives and improve educational results for students. After a year of intentional planning and preparation, CDE proposes to conduct its first subgrant competition in the fall of 2019 (pg. e62).

Weaknesses:

While the applicant describes several actions it intends to employ to ensure only high-quality applicants are selected for subgrant funding, the likelihood selected subgrantees will meet proposed project objectives and improve educational results for students is not strongly established. For instance, the application identifies replication/expansion of high-performing charter schools as a key component of the grant project; however, the pool of high-quality schools in the state (e.g., number or percentage of schools) from which to fund replication/expansion subgrants is unclear. Further the application lacks an analysis of how previous/current federal CSP subgrantees are meeting project objectives and improving educational results for students to evidence the likelihood that future subgrantees will do so.

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 provides a well-developed response describing its proposed state plan that includes a comprehensive description of CDE's monitoring of subgrantees over the life of their grant. Monitoring begins with a pre-application evaluation and risk assessment and continues through a review of the final grant report after the subgrantee's project ends. CDE conducts programmatic, fiscal, and compliance monitoring of each subgrant according to an established calendar of monitoring requirements and benchmarks including precondition assessment before funds are released, annual reporting, regular phone check ins, site visit in year one, an extensive external site visit in the second or third year of the project, and review of final reports and documentation to verify grant objectives and terms were met (pp. e63-68).

The applicant's monitoring system includes assessment, evaluation, and support for subgrantees. CSP staff in the SOC continuously use performance and compliance data to inform their monitoring efforts with each subgrantee. Additionally, CDE copies a school's authorizer on grant reports and reviews to increase the effectiveness and transparency of CSP monitoring. Finally, the applicant proposes to incentivize subgrantees with a fourth year of funding when they demonstrate significant progress toward grant objectives and programmatic expectations (pp. e64-65). CDE's monitoring plans and monitoring system components verify the applicant will adequately monitor subgrantees under its federal CSP grant program.

The applicant references retrieving information from routine data collections to minimize reporting burdens on charter schools (pp. e68-69). Subgrantees are also encouraged to use data from their authorizer's annual report to assist with their CSP reporting and monitoring requirements. Finally, CDE promotes the use of Colorado's Standard New Charter School Application & Evaluation Standards to increase alignment of requirements between authorizers' charter applications and the state's federal CSP subgrant (pg. e69). These strategies appear somewhat likely to minimize duplication of work of charter schools and authorizers in the areas of reporting to CDE and authorizers' new charter school application reviews.

Pages e69-71 summarize the applicant's plans to provide technical assistance and support for applicants selected for federal CSP funding and for quality authorizing efforts in the state. The summary references detailed training, technical assistance and support plans for eligible and selected charter school applicants included under Objective 2 of this application. Activities, inputs, outputs, and performance indicators under Objective 2 also address the state's plan to provide a comprehensive system of support for quality authorizing in the state.

Weaknesses:

While the application discusses efficiencies in building relationships with charter schools and authorizers, the response does not identify specific strategies it plans to employ to avoid the duplication of work for authorizers. Additionally, the application indicates it will work with subgrantees to utilize data from authorizer annual reports to help with federal CSP monitoring and reporting obligations and help eliminate duplication. However, the nature and scope of the annual authorizer report are unclear as is its specific potential to increase efficiencies for subgrantee schools (pg. e69).

Reader's Score: 17

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: 7

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 describes its proposed CSP management plan, which includes quantified performance targets and baseline data, tied to performance measures of the applicant's project objectives, for each of the five years of the state's proposed grant project (Table 1, pp. e71-72). Additionally, the application provides a management plan, based on objective activities described under Selection Criterion B. Objectives, outlining implementation benchmarks, activities, persons/partners responsible and a timeline for achieving each benchmark (pp. e73-77).

Weaknesses:

The application provides a poorly developed response in describing its management plan. While the application's project design, objectives, performance plan, and management plan present an activity-based management plan for the proposed project (pp. e71-77), the plan lacks specificity, especially for the first year of the project. For instance, while the applicant makes a clear case for taking the first project year for research, planning, and preparation before the first subgrant competitions take place in fall of 2019, specific project tasks and milestones to be completed in the first year are unclear.

Reader's Score: 4

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 an adequately developed response describing how the time commitments of project personnel are appropriate and adequate to meet objectives of the proposed project (pp. e56 and budget narrative). The budget narrative in the Appendix (unnumbered pages) specifies FTE allotments for staff and contractors funded under the state's CSP grant project. The applicant expects to dedicate 4.35 to 4.65 FTE of CDE staff time per year to the project, along with significant contractual supports for key grant initiatives and activities. The budget narrative provides a high level of detail and specificity describing the nature, extent, and scope of each line item cost.

Weaknesses:

The lack of detail for year one project tasks is further confounded by the budget narrative. Over \$425,000 in salaries and benefits and \$261,000 in contractor costs are specified in the budget narrative for the first year of the project; however, it is unclear how those costs are directly tied to completion of project tasks during that time. Given the lack of concrete implementation benchmarks for year one, it is difficult to determine if time commitments of the project director and other key staff are appropriate for 2018-19.

Sub Question

Reader's Score: 3

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 provides an adequately developed response that identifies mechanisms and plans for parent and community involvement in the implementation and operation of charter schools in the state (pp. e78-79). State law provides a clear statutory basis for parent involvement in education, establishes a State Advisory Council for Parent Involvement in Education, requires each public school to form a school accountability committee, of which at least half of the members must be parents, and specifies parent and community involvement in the creation, governance, and operation of a charter school.

Colorado's CSP grant project further requires subgrant applicants to articulate the manner in which parents and community members are involved in the formation, operation, and governance of the school. Finally, Objective 1 describes the applicant's research plans in the first year of the project to solicit and consider input from parents and other community members on the implementation and operation of charter schools in the state (pp. e48-50).

Weaknesses:

While the applicant establishes plans and clear intent, especially in the first project year, to promote parent and other community involvement in the implementation and operation of charter schools in the state through research and data collection (pg. e79), the application's plan to implement its proposed parent and community engagement strategy lacks specificity regarding CDE's plans to use and consider data and information it collects from parent and community members to improve the implementation and operation of charter schools in the state.

Reader's Score: 7

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 provides an adequately developed response describing autonomies and flexibilities provided to charter schools under state law (pp. e79-81). Charter schools are responsible for their own operations, including preparation of a budget, contracting for services, facilities, and personnel matters.

Authorizer overhead is limited to 5% of charter schools' per pupil funding from the state, providing charters with the means and autonomy to make administrative, financial, and educational decisions and align their spending accordingly (pg. e80). Additionally, Colorado's State Board of Education has granted 15 automatic waivers from state statute to charter schools through their rulemaking authority – these waivers apply to all charters in the state (pg. e80). Charter schools may also request additional waivers from state statute and board rule and, once granted, continues through the term of the school's charter contract and may be renewed upon charter renewal (pp. e80-81).

The application indicates that CDE may recommend revisions to a charter school's waiver request prior to presentation to the state board for approval as a means to support and promote additional flexibilities for charter schools (pg. e81).

Weaknesses:

While charter schools are able to request non-automatic waivers from state statute for time and personnel areas (e.g., calendar, pupil-teacher contact hours, employing staff with flexible credentials, create their own personnel evaluation systems, set their own salary schedules, create their own hiring and terminations policies, etc.), those important administrative flexibilities appear only available to charters that have successfully obtained applicable waivers and are not automatically provided to all charter schools in the state (pg. e81). The number or percentage of charter schools that actually have non-automatic waivers is unclear, making it difficult to discern the degree of flexibility provided to charter schools in the state.

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 application (pp. e23-25) provides a fully developed response by describing the state's equitable funding provisions provided for in state law. Colorado passed a funding equity law for charter schools in 2017 that positions the state as a national leader in providing equitable funding for charter schools, as recognized by the National Alliance for Public Charter Schools (e23). Charter schools receive the same per pupil revenue as traditional public schools, receive an equitable distribution of federal funds and technical assistance to access those funds, and have equity in accessing competitive grant funding available to other public schools in the state.

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 describing how Colorado provides multiple revenue sources to support charter school facilities (pp. e25-28). The state's Charter School Capital Construction Fund provides funds for charter schools on a per-pupil basis for costs relating to facilities construction, renovation, financing, and the purchasing or leasing of facilities (pp. e25-26). Additionally, charter schools are eligible to apply for competitive Building Excellent Schools Today (BEST) grants, which is a needs-based capital construction fund program. BEST grant funding can be used as matching funds and emergency grants from School Trust Lands, State Lottery revenues, and the marijuana excise tax for major capital projects (pg. e26). Further, the Colorado Educational and Cultural Facilities Authority (CECFA)

is an additional source of charter school facility financing through low-interest tax-exempt bonds to finance charter school land and buildings (pg. e26-27).

Charter schools are provided access to public facilities through a state law requiring school districts to annually publish an inventory of vacant or under-utilized buildings or land for which charter schools can request use (pg. e26). While the district is not required to accept a charter school's request to use an identified building or land, the district must notify their charter schools in writing the reason for the denial. Further, when a district allows a charter school use of a district facility, they may not charge the charter school rent for the use of available space in district facilities (pg. e27).

Additionally, the state has also established in statute a "Moral Obligation Bond Program" that allows a bond underwriter, using the state's credit rating, to charge a lower interest rate to the borrowing charter school (pg. e27).

Finally, state law provides a mechanism for district voters to override local property mill levies to increase taxation for local education funding and voters can also fund a bond offering for capital improvements (pp. e27-28). When school districts are considering raising facility money through bonds, they must invite each charter school in their district to participate in discussions regarding a bond submission.

Weaknesses:

While the state provides a multi-pronged strategy to support funding and access to charter school facilities and land, charter schools do not have guaranteed access to vacant or underutilized facilities and land owned by traditional districts (pg. e27). Additionally, the application does not describe the number or percent of charter schools fully utilizing the aforementioned facility supports, making it difficult to determine the extent to which charter school facilities are actually supported across the state.

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 application presents a poorly develop response in discussing how the state's Unified Improvement Plan (UIP), Federal Programs Consolidated Application, school improvement funds under Title 1, the Colorado School Support Initiative (CSSI), and using charter schools as a turnaround strategy as key means to help improve struggling schools and LEAs (pp. e28-30).

Weaknesses:

While charter schools are included as a strategy for turnaround of failing schools (district or charter), the application does not present a comprehensive strategy for specifically using charter school best practices to improve struggling schools and LEAs.

Reader's Score: 1

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 presents an adequately developed response describing initiatives and programs to support charter schools that serve significant populations of at-risk students (pp. e30-33). The Colorado Department of Education's (CDE) strategic plan seeks to expand access and opportunity for historically underserved students (in all public schools) by implementing strategies to close opportunity and achievement gaps and pairing external partners with schools, including charter schools, to address issues of equity, access, and opportunity (pg. e30 and Appendix F.2). Additionally, Colorado's state law provides a means for public schools, including charter schools, to seek designation as an alternative education campus. This designation, for schools with populations of at least 90% students with one or more high-risk indicators linked to negative education outcomes (e.g., history of dropping out), leverages additional support from CDE's Schools of Choice (SOC) office related to dropout prevention, dropout recovery, and comprehensive career counseling (pg. e31).

Colorado implements additional comprehensive strategies including: 1) high-quality trainings to support practitioners from schools with a focus on serving at-risk students (e.g., Culturally and Linguistically Diverse Education (CLDE) Academy); 2) disseminating best practice resources for serving at-risk and educationally disadvantaged youth through its website and newsletters (e.g., CDE's Best Practices Guide for Dropout Prevention); and 3) providing competitive grant programs focusing on improving service to educationally disadvantaged students (e.g., Expelled and At-Risk Student Services (EARRS) (pp. e31-32).

Finally, the applicant encourages charter schools to serve at-risk youth through its federal CSP subgrant. The SOC encourages charter schools to serve greater numbers of at-risk youth by incentivizing the use of a weighed lottery through a CSP subgrant. Colorado also received a waiver in 2017 to its CSP application to award priority points in the subgrant competition and additional grant funds for subgrant applicants that meet criteria for reaching traditionally underserved populations (pp. e32-33).

Weaknesses:

While the applicant describes specific supports available to charter schools that serve at-risk students, the application does not indicate the number or percentage of charter schools or charter school students that actually receive and benefit from the supports available.

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 presents a well-developed response describing several requirements and initiatives to showcase the steps it has taken to ensure all authorized public chartering agencies implement best practices for charter school authorizing (pp. e33-39). State law and state board rule provide a foundation for authorizer accountability that requires authorizers to effectively monitor charter schools' financial and academic practices and evaluate charter schools' academic, financial, and operational quality and performance.

These statutory provisions require authorizers to: 1) annually assess school performance data including academic achievement, academic growth, and postsecondary and workforce readiness; 2) review the school's independent, annual financial audits prepared in accordance with generally accepted accounting principles (GAAP) and ensure the school's financial audits are publicly reported; and 3) hold schools accountable for the academic, financial, and operational performance measures in the charter contract and base their renewal, non-renewal, and revocation decisions on the school's performance against such contractual measures (pp. e33-34).

In addition to state law and rule, the applicant describes The Education Accountability Act, the School Performance Framework, the Colorado Growth Model, Colorado's READ Act, and CDE's annual accreditation process as strategies CDE implements to support authorizers in monitoring and evaluating charter school performance (pp. e35-36). Further, the state has published, "The Standards for Charter Schools and Charter School Authorizers" and "Colorado Charter School Sample Contract" to help guide authorizers in the implementation of effective school oversight and monitoring (pp. e36-37).

Finally, CDE' SOC leverages its federal CSP grant to work collaboratively with the Colorado Association of Charter School Authorizers (CACSA), the Charter School Institute (CSI), and the Colorado League of Charter Schools (The League) to develop and implement training, support, and resources to promote best practices in charter school authorizing across the state. These supports include sharing effective practices for authorizer application reviews, bringing authorizers together to share experiences and learn from one another, and sharing resources with new authorizers including mentoring and guidance documents (pp. e34-35).

Weaknesses:

While the application describes multiple strategies to promote best charter school authorizing practices in the state that go beyond statutory requirements, it does not describe steps it has taken to ensure Colorado authorizers are implementing best practices.

Reader's Score: 4

Status: Submitted
Last Updated: 06/12/2018 04:07 PM