## Questions

### Selection Criteria

**Need for facility funding**
- Need for facility funding: 30 points, scored 24 points.

**Quality of Plan**
- Quality of Plan: 40 points, scored 36 points.

**The Grant Project Team**
- The Grant Project Team: 10 points, scored 8 points.

**The budget**
- The budget: 10 points, scored 10 points.

**Quality of the project evaluation**
- Project Evaluation: 10 points, scored 8 points.

### Priority Questions

**Competitive Preference Priority**

**Competitive Preference Priority 1**
- CPP1: 5 points, scored 4 points.

**Competitive Preference Priority 2**
- CPP2 A: 2 points, scored 2 points.
- CPP2 B: 2 points, scored 1 point.
- CPP2 C: 2 points, scored 2 points.
- CPP2 D: 2 points, scored 1 point.

**Competitive Preference Priority 3**
- CPP3: 20 points, scored 0 points.

### Sub Total
- 100 points, scored 86 points.

### Sub Total
- 33 points, scored 10 points.

### Total
- 133 points, scored 96 points.
Technical Review Form

Panel #1 - FY19 State Incentives - 1: 84.282D

Reader #1: **********
Applicant: Indiana Department of Education (S282D190002)

Questions

Selection Criteria - Need for facility funding

1. (1) The need for per-pupil charter school facility funding in the State.
   
   (2) The extent to which the proposal meets the need to fund charter school facilities on a per-pupil basis

Strengths:

(1) The applicant established the need for per pupil charter school facility funding due to several elements of need. Those include the gap in the per-pupil facilities funding through local property taxes. As the traditional public school corporation will receive on average $________ per-pupil and only the highest performing charter will receive any facility funding and that amount is now $________ per-pupil. (Page e22) Also noted as a need element is that the traditional public school corporations with the highest per-pupil facilities expenditures are typically rather small schools. Since charter schools are also typically smaller number of students, the per-pupil expense is also higher. (Page e23)

(1) The applicant also noted as a need for facility funding that the public schools with the highest per-pupil facilities expenditures are typically schools with smaller student populations. Since charter schools typically serve a smaller number of students, the per-pupil expense is higher than the traditional schools with larger student populations. (Page e23)

(1) The applicant also established that a gap exists in Indiana per-pupil facilities funding between traditional public schools and charter schools as the local communities are permitted to petition its voters for additional funding for traditional public schools. This mechanism is not available for charter schools. Without this option charter schools can not access this additional funding. (Page e25)

(1) The applicant indicates that Indiana General Assembly does offer to charter schools a "$________ for unused facilities". This would provide charter schools the opportunities to purchase vacant school buildings for $________. This effort to close the gap has not proved to be very successful as often the vacated building is in disrepair or expensive to repair. (Page e27) These elements of need do establish a significant gap in funding for the traditional public school and the charter schools.

(2) The applicant identifies that the funding received from this grant will be used to allocate per-pupil funding for charter school facilities based on the ability for the charter school to "exceed or meet" expectations. These expectations are determined by an overall academic accountability determination that is established by the Indiana (Every Student Succeeds Act (ESSA) plan. This will assure that funding for those programs demonstrating academic improvement will receive funding. (Page e28)

Weaknesses:

(1) The applicant indicates that there is a need for additional charter school funding due to serving a greater percentage of students who qualify for free and reduced priced meals and those who have special needs and for whom English is a second language. The applicant does not establish that those students produce higher facility costs. Therefore, it is not clear if this does cause a higher need for additional facility funding. (Page e24)

(2) The applicant does not identify that the funds from this grant will meet the extent of existing gap in the per-pupil funding. Therefore, it is not clear if sufficient funding will be distributed.
Selection Criteria - Quality of Plan

1. (1) The likelihood that the proposed grant project will result in the State either retaining a new per-pupil facilities aid program or continuing to enhance such a program without the total amount of assistance (State and Federal) declining over a five-year period.

(2) The flexibility charter schools have in their use of facility funds for the various authorized purposes.

(3) The quality of the plan for identifying charter schools and determining their eligibility to receive funds.

(4) The per-pupil facilities aid formula’s ability to target resources to charter schools with the greatest need and the highest proportions of students in poverty.

(5) For projects that plan to reserve funds for evaluation, the quality of the applicant’s plan to use grant funds for this purpose.

(6) For projects that plan to reserve funds for technical assistance, dissemination, or personnel, the quality of the applicant’s plan to use grant funds for these purposes.

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

Note: The applicant should review the Performance Measures section of this notice for information on the requirements for developing project-specific performance measures and targets consistent with the objectives of the program.

Strengths:

(1) The applicant indicated that Indiana has expanded its investment in charter schools as it has increased the per-pupil allocation from $ to $ last year. In the letters of support from the Indiana State Board of Education and Superintendent of Public Education currently the state is implementing a 2017 Charter School Program Grant. (Page e102-e103) These efforts indicate a state level commitment to charter school programs.

(2) The applicant indicates that Indiana has “fiscally and legally autonomous charter schools with independent charter school boards.” This coupled with the flexibilities afforded in Indiana state statutes for charter schools, the charter school organizations will be included in the activities of rental, purchase of building, construction, renovation, leasehold improvement, or debt service. These efforts provide ample flexibility. (Page e29)

(3) The applicant does establish appropriate criteria for determining funding those charters that have established the highest level of performance. (Page e30) Those criteria include those schools that perform at the Exceeds Expectations or Meets Expectations as determined by their federal grades.

(4) The applicant demonstrates that the plan will incorporate the Qualified Opportunity Zones or areas experiencing high rates of economic distress. These identified areas will be utilized to assure that support and technical assistance as well as financial resources are available to charter schools with the greatest needs. (Page e32)

(5) This project plans to reserve $ for the purpose of evaluation. The applicant defines the plan to include formative and summative components as well as mixed methods. Those include use of student records, financial audits and school quality rubrics. The evaluation plan includes the work of an internal Senior Data Coach Specialist and an external evaluation partner. These efforts will assure that the evaluation plan funds will be used effectively (Pages e33-34)

(6) This proposed project will be administrated by the Indiana Department of Education’s Title Grants and Support division,
Office of Charter Schools. The project will include technical assistance through the use of professional development activities in the areas of school safety, mental health and “wraparound” services. These services will be coordinated with the partners of the charter school’s communities. These services will be instructional audits and well as facilities audits to insure safety of students. These efforts will provide a comprehensive approach to the assistance that is needed for each of the charter schools.

(7) The applicant includes goals and objectives that are specific and measurable and demonstrate a rationale that includes performance measures and targets. For example, the main goal of this project is to improve facilities and encourage improved learning environments and student outcomes.

**Weaknesses:**

(1) The applicant does not specifically address how the funding will be assured during the years of grant as the funding declines. Without that assurance it is difficult to determine if the funding will be available as the federal funding is decreased.

(2) No weaknesses identified in this area.

(3) The applicant does not clearly indicate the criteria that will be used for charter schools that are newly established. Those programs may not have the required “Meets or Exceeds Expectations” levels identified. Therefore it is not clear what criteria will be used by the panel of reviewers: or if new charters will be considered. (Page e31)

(4) No weaknesses identified in this area.

(5) No weaknesses identified in this area.

(6) No weaknesses identified in this area.

(7) No weaknesses identified in this area.

**Reader's Score:** 36

**Selection Criteria - The Grant Project Team**

1. (1) The qualifications, including relevant training and experience, of the project manager and other members of the grant project team, including employees not paid with grant funds, consultants, and subcontractors.

(2) The adequacy and appropriateness of the applicant’s staffing plan for the grant project.

**Strengths:**

(1) The qualifications of the project manager and the other members of the grant project team appear to be highly qualified and have both experience and training in the areas of grant administration and Title program administration. The Senior Data Coach Specialist adds the strength of her experience in research and analytics. (Pages e39-e40 and Resumes, Pages e72-e94)

(2) The plan includes the hiring of a Charter School Facilities Specialist to administer the “day to day” activities of the grant. That hire, assigned at .75 FTE, will be able to meet the daily needs of the scope of the proposed project.

**Weaknesses:**

1) No weaknesses identified in this area.

2) The applicant indicates that one full time equivalency will be provided for this project. That will include .05 project director and .1 FTE assistant project director. The low FTE for the leadership on this project is too limited to accomplish the desired results and extensiveness of this project.
Selection Criteria - The budget

1. (1) The extent to which the requested grant amount and the project costs are reasonable in relation to the objectives, design, and potential significance of the proposed grant project.

(2) The extent to which the costs are reasonable in relation to the number of students served and to the anticipated results and benefits.

(3) The extent to which the non-Federal share exceeds the minimum percentages (which are based on the percentages under section 4304(k)(2)(C) of the ESEA), particularly in the initial years of the program.

Strengths:

(1) In Table 1, the applicant identifies The Charter School Aid Paid by State. These projected elements are reasonable and are based on current legislation in Indiana. (Page e67) In Table 2, the applicant identifies the grant funds expenditures. The Technical assistance amounts are appropriate and reasonable in relation to the objectives of the proposed project. (Page e68)

(2) In Table 3, the applicant identifies costs that are reasonable in relation to the number of students served. That total is $ for project year one. A total of 17,102 students will are expected to be served. This will add $ per pupil. (Pages e67-69 and e43)

(3) In Table 3, the applicant indicates that during year one the federal grant request is 21.05% of the cost of per-pupil aid. In year five that is 8.16%. These meet the minimum federal funding percentages required which is 90% in year one and 20% in year five. (Pages e70 and e43)

Weaknesses:

(1) There were no weaknesses identified in this area.

(2) There were no weaknesses identified in this area.

(3) There were no weaknesses identified in this area.

Selection Criteria - Quality of the project evaluation

1. (1) The Secretary considers the quality of the evaluation to be conducted of the proposed project.

(2) In determining the quality of the evaluation, the Secretary considers the following factors—

(i) The extent to which the methods of evaluation are thorough, feasible, and appropriate to the goals, objectives, and outcomes of the proposed project.

(ii) The extent to which the methods of evaluation will provide performance feedback and permit periodic assessment of progress toward achieving intended outcomes.
(iii) The extent to which the methods of evaluation will provide valid and reliable performance data on relevant outcomes.

**Strengths:**

1-2)(i) The evaluation plan includes three objectives that are measurable and are evaluated through a thorough evaluation processes. Those objectives include to increase the number of high quality charter school facilities statewide, support charter school grantees to be academically successful, and to prepare and support charter schools to serve diverse populations. The objectives also include to close the achievement gaps between minority/non-minority and paid lunch/free and reduced lunch groups. The State will evaluate the charter schools based on student outcomes collected through surveys, interviews and focus groups. (Pages e49-50)

(ii) The applicant provided extensive information regarding the data collection and reporting that will occur to address each of the objectives. For example, the finance audits will be used to determine the percent of the subgrantee’s per-pupil tuition support spent on operations. The quality of the facilities will be measured and evaluated by a school facility rubric on facilities. Academic achievement will be measured by the statewide assessments and the number and percent of students in high growth categories as calculated by Indiana Department of Education. These efforts will ensure that performance feedback will be provided. (Pages e49-50)

(iii) The applicant indicates that the majority of the data is “already collected and that previous work has demonstrated the reliability” of the data. (Page e49)

**Weaknesses:**

1-2)(i) No weaknesses were identified

1-2)(ii) The applicant does not address a specific timeline for periodic assessment of progress. The processes identified are on an annual basis. It is not clear if that will provide appropriate frequency of feedback to assure that objectives will be met and implementation of changes will be timely.

1-2)(iii) The applicant does not specifically address what “stipulations” will be required of the subgrantees in their effort to provide reliable and valid data. Without those clarifications it is difficult to determine if that data will be reliable and valid.

**Reader’s Score:** 8

**Priority Questions**

**Competitive Preference Priority - Competitive Preference Priority 1**

1. **Competitive Preference Priority 1 - Spurring Investment in Opportunity Zones**

   (a) **Services targeted to Opportunity Zones**

   The extent to which the applicant would target services to a Qualified Opportunity Zone, as designated by the Secretary of the Treasury under section 1400Z-1 of the Internal Revenue Code, as amended by the Tax Cuts and Jobs Act (Pub. L. 115-97). An applicant must—

   (1) Provide the census tract number of the Qualified Opportunity Zone(s) in which it proposes to provide services; and

   (2) Describe how the applicant will provide services in the Qualified Opportunity Zone(s).
Strengths:

(1) The applicant provides the census track number of the Qualified Opportunity Zone (QOZ) in which it proposes to provide services. For example, Indiana has 156 qualified opportunity zones which demonstrate high rates of economic distress. Of these 106 zones served by 32 charter schools are within those areas. Eleven additional QOZ’s have charters in them that do not meet the current eligibility criteria set by the Indiana Department of Education. Those charter schools will receive technical assistance. (Page e53)

(2) The proposed project will provide funding to charter schools that meet the “Exceeds or Meets Expectation” eligibility criteria. These schools will submit a facilities plan to the Indiana Department of Education detailing their project objectives and expected costs. (Pages e53-54)

(2) The applicant indicates that additional funding will be used to provide technical assistance and funding for safety audits. This will provide for closing the gap between tradition schools and charter schools in the areas of instructional space and safety. (Page e54)

Weaknesses:

(1) No weaknesses were identified in this area.

(2) The applicant does not clearly identify how the submitted facilities plans will be prioritized or what criteria will be used to determine the eligibility for the grant.

Reader’s Score: 4

Competitive Preference Priority - Competitive Preference Priority 2


   (a) High-Quality Charter School Authorizing.
   The extent to which the State demonstrates support for high-quality charter school authorizing, such as through providing technical assistance to support each authorized public chartering agency in the State to improve such agency’s ability to monitor the charter schools authorized by the agency, including by--

   (1) Assessing annual performance data of the schools, including, as appropriate, graduation rates, student academic growth, and rates of student attrition;
   (2) Reviewing the schools’ independent, annual audits of financial statements prepared in accordance with generally accepted accounting principles, and ensuring that any such audits are publicly reported; and
   (3) Holding charter schools accountable to the academic, financial, and operational quality controls agreed to between the charter school and the authorized public chartering agency involved, such as through renewal, non-renewal, or revocation of the school’s charter.

Strengths:

(1) The applicant demonstrates how the State will ensure that charter schools are meeting the criteria set through the use of standardized test results, end-of-course assessments, attendance rates, graduation rates, suspension and expulsion rates. The proposed project will provide appropriate technical assistance such as financial guidance and best practices in supporting all students as needed based on the assessments. This effort will assure that the needs are met. (Pages e55-56)

(2) The charter schools in Indiana are required to be audited using a private examiner that meets the single audit requirements. These audits are posted annually on an accessible government website. (Page e56)

(3) The applicant defines the processes that are necessary for charter schools to have an annual review of the academic, operational and financial goals for that charter. These processes will assure that the charter schools are held accountable. The authorizer of the charter schools can revoke or select not to renew the charter or require alternative interventions. (Pages e57-58)
2. Competitive Preference Priority 2 - State Support for Charter Schools

(b) Number of Educational Choices through Charter Schools

The extent to which the State demonstrates progress in increasing the number of educational choices for students through the opening of new charter schools, the replication of high-quality charter schools, and the expansion of high-quality charter schools.

Strengths:
The applicant indicates that this grant will put Indiana on track to fund the expansion and replication of 60 high-quality subgrants. The applicant does have specific guidelines of accountability for the expanding and replication charter schools.

Weaknesses:
The applicant does not clearly define or identify the process, criteria, or methods that will be used to open new charter schools throughout the state.

Reader’s Score: 2


(c) At Least One Authorized Public Chartering Agency Other Than a Local Educational Agency (LEA), or an Appeals Process

The State--
(1) Allows at least one entity that is not a local educational agency (LEA) to be an authorized public chartering agency for developers seeking to open a charter school in the State; or
(2) In the case of a State in which LEAs are the only authorized public chartering agencies, the State has an appeals process for the denial of an application for a charter school.

Strengths:

Weaknesses:

No weaknesses identified in this area.

Reader’s Score: 2

(d) High Degree of Autonomy and Flexibility

The extent to which the State ensures that each charter school receiving funds through the program will have a high degree of autonomy and flexibility, including autonomy over budget, operations, and personnel decisions.

Strengths:
The high degree of autonomy and flexibility that is demonstrated by Indiana is evident by the ranking that was received by the Center for Education Reform. Indiana was one of three states to each an “A” for the state charter laws. (Page e59) In Indiana the charter schools have independent boards that are exempt from bargaining units. The charter schools may use their charter agreements as their school improvement plans. (Page e60)

Weaknesses:
The applicant does not identify the specific rules and regulations that are included in the “blanket waiver”. Therefore it is difficult to determine to what extend those waivers exist. (Page e60)

Reader’s Score: 1

Competitive Preference Priority - Competitive Preference Priority 3

1. Competitive Preference Priority 3 - Novice Applicants

Applicants that have not previously received a grant under the program.

Strengths:
The applicant was awarded in 2009. (Page e60)

Weaknesses:
Does not apply.

Reader’s Score: 0

Status: Submitted
Last Updated: 08/30/2019 12:00 PM
## Technical Review Coversheet

**Applicant:** Indiana Department of Education (S282D190002)

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

### Questions

#### Selection Criteria

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<td>Quality of Plan</td>
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<td>38</td>
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<td>The Grant Project Team</td>
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**Sub Total**

|                  | 100   | 89             |

#### Priority Questions

**Competitive Preference Priority**

**Competitive Preference Priority 1**

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**Competitive Preference Priority 3**

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**Sub Total**

|                  | 33              | 13            |

### Total

|                  | 133             | 102           |
Questions

Selection Criteria - Need for facility funding

1. (1) The need for per-pupil charter school facility funding in the State.

   (2) The extent to which the proposal meets the need to fund charter school facilities on a per-pupil basis

Strengths:

IDOE demonstrated a strong need for per-pupil charter school facility funding by estimating that traditional public schools have a facility funding advantage of 5:1 over charter schools in IN, represented by an average $[100] per pupil facilities funding through local property taxes vs $[50] (increasing to $[100] in 2019-20) per pupil for qualifying high performing charter schools. [e22]

IDOE has targeted its CFIG funds by requiring a charter school to place in the Exceeds Expectations or Meets Expectations for the overall ESSA accountability determination. Moreover, charter schools that receive an Exceeds Expectations rating will receive funding preference at an expected 1.5 rate of charters with a Meet Expectations rating. [e28]

Weaknesses:

The additional CFIG funding was estimated by IDOE at $[20] per pupil (for a total of $[30] per pupil), which only marginally closes the facilities funding advantage of traditional public schools as noted in the needs section. [e28]

Reader’s Score: 27

Selection Criteria - Quality of Plan

1. (1) The likelihood that the proposed grant project will result in the State either retaining a new per-pupil facilities aid program or continuing to enhance such a program without the total amount of assistance (State and Federal) declining over a five-year period.

   (2) The flexibility charter schools have in their use of facility funds for the various authorized purposes.

   (3) The quality of the plan for identifying charter schools and determining their eligibility to receive funds.

   (4) The per-pupil facilities aid formula’s ability to target resources to charter schools with the greatest need and the highest proportions of students in poverty.

   (5) For projects that plan to reserve funds for evaluation, the quality of the applicant’s plan to use grant funds for this purpose.

   (6) For projects that plan to reserve funds for technical assistance, dissemination, or
personnel, the quality of the applicant’s plan to use grant funds for these purposes.

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

Note: The applicant should review the Performance Measures section of this notice for information on the requirements for developing project-specific performance measures and targets consistent with the objectives of the program.

Strengths:

IDOE demonstrated that this proposed CFIG project at a total cost of $112.5 million of state funds plus $ of federal funds ($ overall) would enable it to continue to enhance its State per pupil program without the total amount of assistance (State and Federal) declining over a five-year period. [e29]

Allowable subgrantee uses are flexible to include (1) rent; (2) purchase of a building or land; (3) construction; (4) renovation of an existing school facility; (5) leasehold improvements; or (6) Debt service on a school facility. Charter schools may not use these grant funds for purchasing land when they have no immediate plans to construct a building on that land. Facility funding applications are also streamlined for those meeting high quality criteria. Administrative expenses are capped at five percent of the award. [e29]

IDOE favors quality over quantity with per pupil funding earmarked to established charters with demonstrated performance. Eligibility is limited to schools that perform at the Exceeds Expectations or Meets Expectations levels of ESSA. Such targeting is especially important when education funding for public schools as a whole remains insufficient. All schools must be held accountable for their academic performance, including those who specialize in meeting the needs of various student groups. [e30]

In the 2018-2019 school year; students at Indiana charter schools eligible for Free And Reduced-priced Meals (FARM) was 72.04 percent, compared to 47.6 percent in traditional public schools. Minority students also enroll in charter schools at a much higher rate of 59.81 percent in charter schools and 31.43 percent in traditional public schools. IDOE will provide direct per pupil facilities funding to 32 schools, reflecting 106 of the QOZ census tracts, a rate of 68 percent. [e31-32]

IDOE will reserve over the project period of 5 years to conduct a mixed-methods evaluation, which will include both formative and summative components. IDOE will collect data from a variety of sources, including student records, financial audits and school quality rubrics. The comprehensive evaluation plan will involve both internal actions by IDOE and activities performed by an external evaluation partner, that evaluates both subgrantee and SEA-level actions to ensure best practices and areas of needed refinement can be identified. Each subgrantee will receive an on-site monitoring by IDOE CFIG staff within twelve months of awarding with subsequent on-site, desktop, or fiscal monitoring to be determined based on a risk assessment. [e33-34]

IDOE will contract with an external partner with demonstrated charter school facilities expertise to complete a comprehensive needs assessment, which will then inform the technical assistance activities provided to the Indiana charter school community. IDOE will be including instructional audits during monitoring. Facilities will need to have the technological infrastructure in place to make sure students have internet access. IDOE will also make sure schools have the highest level of building safety, support for social and emotional learning, and student service areas to further close the opportunity and equity gap for access to a high-quality education. Technical assistance will support the development of such wraparound services. [e35-36]

IDOE provided a rationale that improved facilities will encourage improved learning environments and student outcomes. To this end, IDOE described three measurable objectives underscoring this rationale: (1) increase the number of high quality charter school facilities statewide; (2) support charter school grantees to be academically successful, and (3) prepare and support charter schools to serve diverse populations and close the achievement gap between subgroups. [e36-37]
Weaknesses:
IDOE under its prior CFIG award in 2009 was unable to meet the expectation that the state provided matching funds throughout the life of the grant. IDOE notified the U.S. Department of Education in July 2013 that it was not able to fulfill this obligation, and explained the state forfeited the charter school facilities incentive funds. [e60]

Reader’s Score: 38

Selection Criteria - The Grant Project Team
1. (1) The qualifications, including relevant training and experience, of the project manager and other members of the grant project team, including employees not paid with grant funds, consultants, and subcontractors.

(2) The adequacy and appropriateness of the applicant’s staffing plan for the grant project.

Strengths:
IDOE described project staff with relevant training and experience. The Project Director (.05 FTE of CFIG) serves as the Director of Title Grants and Support and has been in his current position since January 2017. The Assistant Project Director (.10 FTE of CFIG) serves as the Assistant Director of Charter Schools and Special Programs and will serve as the immediate supervisor of the grant specialist team administering the CFIG operations. The Senior Data Coach Specialist (non-CFIG funding) with nearly ten years of experience in research and analytics has led a number of research and evaluation projects of charter school performance across Indiana. The Chief of Staff (non-federal funding) with more than 20 years of experience will play a role of connecting the team to many external support partners in addition to serving as the main political liaison for the Department’s interests. The Chief Academic Officer (non-federal funding) who is a former superintendent bring organizational management and school safety expertise. The Chief Financial Officer (non-federal funding) provides more than thirty years of financial and accounting experience and will help coordinate the fiscal oversight and management of the CFIG grant. [e38-40]

Weaknesses:
IDOE did not adequately address the project staffing plan in view of the fact that three-fourths of the one FTE it intends to devote department-wide to the project will be recruited following receipt of the award. Aside from this yet to be hired Charter School Finance Specialist, the remaining one-fourth of the one FTE is divided between a Project Director (.05 FTE, which computes to an average of 2 hours per week), an Assistant Project Director (.10 FTE, which computes to an average of 4 hours per week) who is tasked as the immediate supervisor, and finance controllers (also at .10 FTE). While IDOE demonstrated the current staff has an abundance of charter school experience, the team is lacking in specific facilities expertise. The proposal to hire a facilities specialist is an acknowledgment of this need, but it being a prospective hire makes it difficult to assess. The plan also lacked specificity of how the team, together as just one FTE, intends to manage an array of responsibilities, including a peer review subgrant application process, technical assistance activities and the project evaluation. [e40]

Reader’s Score: 7

Selection Criteria - The budget
1. (1) The extent to which the requested grant amount and the project costs are reasonable in relation to the objectives, design, and potential significance of the proposed grant project.

(2) The extent to which the costs are reasonable in relation to the number of students served and to the anticipated results and benefits.
(3) The extent to which the non-Federal share exceeds the minimum percentages (which are based on the percentages under section 4304(k)(2)(C) of the ESEA), particularly in the initial years of the program.

Strengths:
The total federal request from IDOE is [redacted] over 5 years, whereas state funding in that same period will be [redacted]. This is a ratio of over 5:1 of state funding compared to federal funding. At least 95 percent of the total project cost will provide per-pupil facility funding to eligible charters. The project will serve an expected minimum of 32 charter schools directly, which will be prioritized by existing, high-performing charters, especially those that serve Qualified Opportunity Zones. [e41]

An estimated total of 17,102 students are in the expected minimum of 32 charters that meet the eligibility criteria, including those which serve students in the QOZs. This represents an added per-pupil benefit in Year 1 of [redacted] if utilizing prior year accountability data. The performance measures that Indiana has set for this grant will track whether facilities improved through a school facility rubric and audits of instructional, support, and safety measures. The anticipated results will demonstrate an improvement of specific facility indicators, as defined by the rubric. Furthermore, with more facility funding, then current funding dedicated for these costs can be repurposed to increase instructional supports. The evaluation proposed through this project will track whether performance of the schools that receive the CFIG funds will improve overall academic performance, as compared to the control group that is not eligible. [e42]

Indiana will far exceed the expectation of ensuring a minimum 10 percent state share in year one of implementation, as the maximum federal burden is 21 percent. The CFIG leverages the recent [redacted] increase of existing per pupil state funding for charter facilities to ensure that high-performing charters have the capital to offer a high-quality learning space to their students. [e43]

Weaknesses:
IDOE acknowledges in its application that CFIG funding may increase by [redacted] per pupil in Year 1, but then see a gradual reduction to [redacted] in Year 2, for example. While it holds out hope the results of the grant may prompt the state legislature to increase the state share, there is no evidence to support this as a reasonable expectation. [e41]

Reader's Score: 9

Selection Criteria - Quality of the project evaluation

1. (1) The Secretary considers the quality of the evaluation to be conducted of the proposed project.

   (2) In determining the quality of the evaluation, the Secretary considers the following factors—

   (i) The extent to which the methods of evaluation are thorough, feasible, and appropriate to the goals, objectives, and outcomes of the proposed project.

   (ii) The extent to which the methods of evaluation will provide performance feedback and permit periodic assessment of progress toward achieving intended outcomes.

   (iii) The extent to which the methods of evaluation will provide valid and reliable performance data on relevant outcomes.
Strengths:

IDOE described a CFIG scope of evaluation to include analysis of student-level data to measure the extent of grant activities on student outcomes, especially by subgroup, and the relationships among activities and student outcomes. Additional evaluation activities could be included at the judgement of the third-party evaluator, which can include surveys, interviews and focus groups of subgrantees to understand how the grant has changed school capacity and climate, as well as interviews with IDOE staff to determine lessons learned and identify best practices in implementation of the CFIG at the state level. The data and final evaluation report will be made available to the U.S. Department of Education and posted on IDOE’s public Charter School Program website.

IDOE will measure the extent that high-quality facilities improve educational outcomes and predicts that with increased quality of facilities, subgrantees will be enabled to spend more on instructional budgets. Furthermore, the improved facilities will encourage better learning environments. The high-quality facilities and increased instructional budgets are presumed to improve the engagement of students, improve attendance rates, decrease likelihood of disciplinary actions, improve teacher retention, and eventually improve pass rates on statewide assessments, as well as promotion and graduation rates of students, among other academic outcomes.

Since the evaluation includes both formative and summative components, this will give IDOE capacity to determine the extent of progress, gain feedback and determine if any changes will be made to programming.

The majority of this data is already collected, and previous work has demonstrated the reliability, validity and meaningfulness of the data and conclusions. The proposed measures provide a multidimensional way to examine different aspects of high-quality facilities (e.g., safety) and the predicted changes that occur (e.g., academic achievement). IDOE proposed an aggressive target reducing from 25 percent to 15 percent the subgrantee’s per-pupil tuition support being spent on operations to bring the percentage in line with traditional public schools.

Weaknesses:

IDOE makes several references to a school facility rubric, but leaves this undefined in terms of what it intends to track to determine whether facilities improved.

Reader’s Score: 8

Priority Questions

Competitive Preference Priority - Competitive Preference Priority 1

1. Competitive Preference Priority 1 - Spurring Investment in Opportunity Zones

(a) Services targeted to Opportunity Zones

The extent to which the applicant would target services to a Qualified Opportunity Zone, as designated by the Secretary of the Treasury under section 1400Z-1 of the Internal Revenue Code, as amended by the Tax Cuts and Jobs Act (Pub. L. 115-97). An applicant must—

(1) Provide the census tract number of the Qualified Opportunity Zone(s) in which it proposes to provide services; and

(2) Describe how the applicant will provide services in the Qualified Opportunity Zone(s).
Strengths:
Of the 156 total Qualified Opportunity Zones (QOZs), IDOE projects to provide direct per pupil facilities funding to 106 of the census tracts, a rate of 68 percent. This is based upon the number of charters, 32 in total, that serve the QOZs and meet the eligibility requirements for performance metrics. Beyond the 106, eleven additional QOZs have charters that serve these areas, but the charters do not meet the eligibility criteria for direct, per-pupil funding for new and high-performing charters, but will IDOE will provide technical assistance to improve lower-performing charters, including audits of physical space for instructional, support, or safety purposes, have the potential to improve the academic performance of schools. Through direct, per-pupil facility funding to 32 expected charters, and the provision of technical assistance to 8 more, IDOE will serve approximately 40 charters in total, across 117 census tracts that represent QOZs. [e51-53]

Technical assistance funds will be used to engage a qualified vendor to support audits of the instructional spaces of charter schools, like science labs, or support service areas, such as those needed to provide occupational therapy for students with Individual Education Plans (IEPs). Charter schools can use the audits to target their local, state, and federal funding, including CFIG funding, to improve the learning and service environment for 21st century realities. Technical assistance funds will also be used to replicate audits done of traditional public schools for interested charters to analyze the implementation and best practices of the safety plans, such as emergency preparedness drills and prevention of bullying, child abuse, and violent crimes. A summary of the findings will be utilized to share best practices with other charter schools, traditional public schools, and private schools in order to improve their own school spaces. [e54]

Weaknesses:
None noted.

Reader's Score: 5

Competitive Preference Priority - Competitive Preference Priority 2


(a) High-Quality Charter School Authorizing.
The extent to which the State demonstrates support for high-quality charter school authorizing, such as through providing technical assistance to support each authorized public chartering agency in the State to improve such agency’s ability to monitor the charter schools authorized by the agency, including by--

(1) Assessing annual performance data of the schools, including, as appropriate, graduation rates, student academic growth, and rates of student attrition;
(2) Reviewing the schools’ independent, annual audits of financial statements prepared in accordance with generally accepted accounting principles, and ensuring that any such audits are publicly reported; and
(3) Holding charter schools accountable to the academic, financial, and operational quality controls agreed to between the charter school and the authorized public chartering agency involved, such as through renewal, non-renewal, or revocation of the school’s charter.

Strengths:
IDOE has implemented efforts to ensure high-quality charter school authorizing through various efforts, such as direct innovation grants to charter school authorizers to address individual needs as identified through a comprehensive needs assessment; providing an external technical assistance partner to provide a comprehensive needs assessment to identify areas of needed support such as financial oversight of charter schools, best practices in supporting all students, and how to hold schools accountable; creation of an authorizer boot camp™ for new authorizing agencies and their staff; and ongoing coordination between IDOE and Indiana authorizers. [e55]

IDOE posts annual authorizer reports on the following measures: standardized test results; end-of-course assessment results; attendance rates; graduation rates, (if applicable); suspension and expulsion rates; closed charter schools, (if
applicable); and the reason for non-renewal of a charter. IDOE also opted to provide individual no-bid innovation grants to authorizers of a base amount, plus a per-pupil allocation, based on the student population of their individual portfolios. Examples include: attendance at the NACSA national conference for authorizer staff; charter school governing board training activities; data analysis refinement; refinement of internal processes and procedures; special education training; and fiscal oversight of charter schools. [e55-56]

IDOE requires charter schools to be examined annually through a private examiner. IDOE coordinates with State Board of Accounts (SBOA) to issue management decisions regarding the audit findings and to implement corrective actions. The independent examiners must utilize the state examiner directives and manuals (https://www.in.gov/sboa/4485.htm) to conduct the audits. [e56]

State law requires an authorizer review of charter progress in achieving the academic, operational, and financial goals set forth in the charter at least one time in each five year period the charter is in effect. IDOE also commissioned authorizer technical assistance by SchoolWorks around agency commitment and capacity, application process and decision making, performance contracting, ongoing oversight and evaluation, and revocation and renewal decision making. [e57]

Weaknesses:
None noted.

Reader's Score: 2

2. Competitive Preference Priority 2 - State Support for Charter Schools

(b) Number of Educational Choices through Charter Schools

The extent to which the State demonstrates progress in increasing the number of educational choices for students through the opening of new charter schools, the replication of high-quality charter schools, and the expansion of high-quality charter schools.

Strengths:
Indiana provides 103 charter school options for students and, statewide, charter schools serve significantly higher proportions of low-income and minority students. Its current CSP grant seeks to provide 60 high-quality subgrants across the state. To qualify, applicants must meet a minimum peer review score and expanding or replicating schools must have a federal accountability grade of A or B. [e58]

Weaknesses:
None noted.

Reader's Score: 2


(c) At Least One Authorized Public Chartering Agency Other Than a Local Educational Agency (LEA), or an Appeals Process

The State--
(1) Allows at least one entity that is not a local educational agency (LEA) to be an authorized public chartering agency for developers seeking to open a charter school in the State; or
(2) In the case of a State in which LEAs are the only authorized public chartering agencies, the
State has an appeals process for the denial of an application for a charter school.

Strengths:
Indiana has nine authorizers. These entities include four higher education institutions, three Local Education Agencies (LEA), one Independent Charter Board, and one Non-Educational Government Entity. Organizers who have a proposal rejected by an authorizer are explicitly permitted to amend and resubmit their proposal to that authorizer, or to submit a proposal to another authorizer. [e59]

Weaknesses:
None noted.

Reader’s Score: 2


(d) High Degree of Autonomy and Flexibility

The extent to which the State ensures that each charter school receiving funds through the program will have a high degree of autonomy and flexibility, including autonomy over budget, operations, and personnel decisions.

Strengths:
Indiana charter schools are legally autonomous schools with independent boards, and exempt from bargaining units yet retain access to relevant state employee retirement systems. Charter schools are permitted the flexibility of having 90 percent of their full time staff certified with any valid Indiana license and provides for a specific charter school teaching license when certain criteria are met. Charter schools may use their charter agreement as their school improvement plan pursuant to law. Charters receive a blanket waiver from most rules and regulations governing traditional public schools. [e60]

Weaknesses:
None noted.

Reader’s Score: 2

Competitive Preference Priority - Competitive Preference Priority 3

1. Competitive Preference Priority 3 - Novice Applicants

Applicants that have not previously received a grant under the program.

Strengths:
None noted.

Weaknesses:
IDOE has previously received a grant under the program.
## Technical Review Coversheet

### Applicant:
Indiana Department of Education (S282D190002)

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

### Questions

#### Selection Criteria

1. **Need for facility funding**
   - Points Possible: 30
   - Points Scored: 25

2. **Quality of Plan**
   - Points Possible: 40
   - Points Scored: 35

3. **The Grant Project Team**
   - Points Possible: 10
   - Points Scored: 9

4. **The budget**
   - Points Possible: 10
   - Points Scored: 10

5. **Quality of the project evaluation**
   - Points Possible: 10
   - Points Scored: 8

   **Sub Total**
   - Points Possible: 100
   - Points Scored: 87

### Priority Questions

#### Competitive Preference Priority

1. **Competitive Preference Priority 1**
   - Points Possible: 5
   - Points Scored: 4

2. **Competitive Preference Priority 2**
   - Points Possible: 20
   - Points Scored: 11

   **Sub Total**
   - Points Possible: 33
   - Points Scored: 11

   **Total**
   - Points Possible: 133
   - Points Scored: 98
Technical Review Form

Panel #1 - FY19 State Incentives - 1: 84.282D

Reader #3: **********
Applicant: Indiana Department of Education (S282D190002)

Questions

Selection Criteria - Need for facility funding

1. (1) The need for per-pupil charter school facility funding in the State.
   (2) The extent to which the proposal meets the need to fund charter school facilities on a per-pupil basis

   Strengths:
   The applicant adequately demonstrated the need for facility funding. Using an analysis of the gap in property tax proceeds, the applicant would provide traditional public schools with a 5:1 advantage over charter schools of facility funding (Pg. e22).

   In addition to property taxes, the applicant cited other sources of local revenue available to traditional school but not charter schools, such as referendum dollars, excise tax revenue, and local income tax allocations (Pg. e106).

   The applicant demonstrated that it would adequately meet the need to fund charter school facilities on a per-pupil basis. It will achieve this goal by developing a funding mechanism that follows the enrollment of a child similarly to other state-level funding sources. This mechanism will also help allocate federal funding on a per-pupil basis to complement the established programs (Pg. e27).

   Weaknesses:
   The applicant did not adequately substantiate the projected higher costs for meeting the needs of free lunch, English as a second language, and special needs students (Pg. e24). It does not support its stated assumptions with any quantifiable evidence about the additional financial burden charter schools face in serving these populations.

Reader’s Score: 25

Selection Criteria - Quality of Plan

1. (1) The likelihood that the proposed grant project will result in the State either retaining a new per-pupil facilities aid program or continuing to enhance such a program without the total amount of assistance (State and Federal) declining over a five-year period.
   (2) The flexibility charter schools have in their use of facility funds for the various authorized purposes.
   (3) The quality of the plan for identifying charter schools and determining their eligibility to receive funds.
   (4) The per-pupil facilities aid formula’s ability to target resources to charter schools with the greatest need and the highest proportions of students in poverty.
   (5) For projects that plan to reserve funds for evaluation, the quality of the applicant’s plan to use grant funds for this purpose.
For projects that plan to reserve funds for technical assistance, dissemination, or personnel, the quality of the applicant’s plan to use grant funds for these purposes.

The extent to which the proposed project demonstrates a rationale.

Note: The applicant should review the Performance Measures section of this notice for information on the requirements for developing project-specific performance measures and targets consistent with the objectives of the program.

Strengths:

The applicant provided an impressive design for the proposed grant project. It will likely result in achieving the objective of increasing the number of high-quality charter schools statewide via incubation, replication, expansion, or improvement (Pg. e37).

The applicant proposed a per-pupil funding mechanism that will have significant impacts on the charter schools it supports (Pg. e28). This mechanism demonstrates the effective use of state resources to leverage the investment of federal support. This leveraging should result in a higher amount of financial resources available to support existing charter schools and to launch new ones.

Also, the applicant will significantly leverage the proposed grant with non-federal funds at a ratio of 5.6:1 (page e8). Furthermore, the applicant submitted a project implementation plan of itself and subgrantees that is sound and likely to achieve the measurable goals and objectives listed (pg. e48).

By targeting and providing a chartering preference for schools located in QOZs or other areas of high economic distress, the applicant’s identification process is reasonable in terms of the objectives, design, and reaching the schools with the greatest need (pg. e32).

The applicant intends to reserve funds for technical assistance and personnel (Pg. e34). Its strategy involves hiring one FTE to oversee the technical assistance activities, along with grant administration and monitoring (Pg. e41).

The rationale for the proposed project demonstrates a direct linkage to the applicant’s requested grant and its existing charter school funding. Specifically, the applicant is seeking support to provide facilities funding and to increase the number of charter schools through incubation, replication, and expansion (Pg. e37). Its existing Quality Counts program, funds improving the educational outcomes created by the state’s charter schools (Pg. e36).

Weaknesses:

The applicant’s overall plan for the project grant did not include a clear linkage between the charter school identification process and the objectives of potential investors in the QOZs. This investment program is relatively new. As a result, there aren’t any tested models showing how investors will allocate capital to qualified projects. The applicant did not indicate whether it completed any preliminary discussions with potential investors about their investment criteria. Consequently, it cannot provide any assurance that charter schools located in QOZs will attract capital from qualified investors.

The description of the applicant’s per-pupil facilities aid formula under the CFIG listed the objectives of its funding approach but did not state a clear nexus between the intent of this formula and the implementation strategy (Pg. e36).

Selection Criteria - The Grant Project Team

1. (1) The qualifications, including relevant training and experience, of the project manager and other members of the grant project team, including employees not paid with grant funds, consultants, and subcontractors.
(2) The adequacy and appropriateness of the applicant’s staffing plan for the grant project.

Strengths:
The applicant has a highly qualified team, who possess the requisite training and experience to implement the proposed activities successfully (Pg. e37). Each team member currently works within the applicant’s organization (IDOE), and several previously held positions in schools or educational administration. These experiences should provide insights into identifying and addressing issues that affect charter schools.

Weaknesses:
The applicant intends to add a new charter school facilities specialist to its team. It describes most of the qualifications and experiences sought in a candidate. However, the applicant did not provide its expectations for the amount of the real estate development expertise required to manage this role effectively (Pg. e40).

The applicant believes that 1.0 FTE is sufficient to carry out the Project (Pg. e41). Since this grant involves offering services in an untested environment (i.e., QOzs), this low number of FTEs for the overall project management would not be appropriate.

Reader’s Score: 9

Selection Criteria - The budget

1. (1) The extent to which the requested grant amount and the project costs are reasonable in relation to the objectives, design, and potential significance of the proposed grant project.

(2) The extent to which the costs are reasonable in relation to the number of students served and to the anticipated results and benefits.

(3) The extent to which the non-Federal share exceeds the minimum percentages (which are based on the percentages under section 4304(k)(2)(C) of the ESEA), particularly in the initial years of the program.

Strengths:
As presented in the project budget, the requested grant amount, and the project costs are reasonable concerning the objectives, design, and potential significance of the proposed grant project (Pg. e112). The budget narrative justified the proposed expenditures with extensive details about how the applicant will source and use the project resources.

The applicant also provided adequate evidence to demonstrate that the costs are reasonable concerning the number of students served (Pg. e42) and that the non-Federal share exceeded the minimum percentage (Pg. e114). It intends to make grants to charter schools using a formula that ensures the funding with the federal share of only allowable activities.

Weaknesses:
There are no notable weaknesses in this section.

Reader’s Score: 10

Selection Criteria - Quality of the project evaluation

1. (1) The Secretary considers the quality of the evaluation to be conducted of the proposed project.
(2) In determining the quality of the evaluation, the Secretary considers the following factors—

(i) The extent to which the methods of evaluation are thorough, feasible, and appropriate to the goals, objectives, and outcomes of the proposed project.

(ii) The extent to which the methods of evaluation will provide performance feedback and permit periodic assessment of progress toward achieving intended outcomes.

(iii) The extent to which the methods of evaluation will provide valid and reliable performance data on relevant outcomes.

Strengths:
The applicant provided a detailed description of the evaluation process; it plans to conduct for the proposed project (Pg. e44). The methodology presented is thorough and appropriate for documenting how well the applicant achieved the goals, objectives, and outcomes of the proposed project (Pg. 45).

Weaknesses:
The description provided by the applicant of the data on which its evaluation process will rely was insufficient and did not demonstrate its reliability or adequacy (Pg. e49). The applicant contended that the prior collection of and previous work on a majority of needed data assures its reliability, validity, and meaningfulness. However, the applicant does not indicate the age of the data collected or the level of suitability for the evaluation process it intends to use for the proposed project.

Reader’s Score: 8

Priority Questions

Competitive Preference Priority - Competitive Preference Priority 1

1. Competitive Preference Priority 1 - Spurring Investment in Opportunity Zones

(a) Services targeted to Opportunity Zones

The extent to which the applicant would target services to a Qualified Opportunity Zone, as designated by the Secretary of the Treasury under section 1400Z-1 of the Internal Revenue Code, as amended by the Tax Cuts and Jobs Act (Pub. L. 115-97). An applicant must—

(1) Provide the census tract number of the Qualified Opportunity Zone(s) in which it proposes to provide services; and

(2) Describe how the applicant will provide services in the Qualified Opportunity Zone(s).

Strengths:
The applicant intends to actively target its services and deploy program resources to specific Qualified Opportunity Zones within each of the state’s nine Congressional Districts (Pg. e6). Its goal is to serve 40 schools in 117 QOZs, which represents 75% of the total QOZs in the state.

One of the ways that the applicant will provide services to charter schools in the QOZs will be to target its resources to the highest-need schools with a proven track record. The applicant will focus on charter schools that satisfy the “Exceeds” or “Meets Expectations” eligibility criteria as well (Pg. e32). Also, the applicant will reserve up to 5% of its grant for technical assistance activities. These resources will give charter schools in these markets access additional assistance in
conducting audits of their instructional space (Pg. e53).

Weaknesses:
The applicant neither clearly identified the exact census tracts of the QOZs where it intends to work nor made any specific references to the services, other than technical assistance, that it plans to offer to the charter schools in those QOZs (Pg. e52).

Competitive Preference Priority - Competitive Preference Priority 2

(a) High-Quality Charter School Authorizing.
The extent to which the State demonstrates support for high-quality charter school authorizing, such as through providing technical assistance to support each authorized public chartering agency in the State to improve such agency’s ability to monitor the charter schools authorized by the agency, including by--

(1) Assessing annual performance data of the schools, including, as appropriate, graduation rates, student academic growth, and rates of student attrition;
(2) Reviewing the schools’ independent, annual audits of financial statements prepared in accordance with generally accepted accounting principles, and ensuring that any such audits are publicly reported; and
(3) Holding charter schools accountable to the academic, financial, and operational quality controls agreed to between the charter school and the authorized public chartering agency involved, such as through renewal, non-renewal, or revocation of the school’s charter.

Strengths:
As evidence of its ongoing support for high-quality charter school authorizing, the applicant stated that requires charters granted by a public chartering agency to provide for a review by the authorizer of the school’s progress in achieving the academic, operational, and financial goals set forth in the charter at least one time in each five-year period the charter is in effect (Pg. e56). To achieve this goal, the applicant collects data of charter schools’ annual performance from a variety of sources including financial audits (Pg. e33) that meet generally-accepted government accounting principles with a yearly review by an external examiner (Pg. e46). Also, it works to ensure that chartering agencies are holding charter schools accountable to the appropriate educational standards and quality controls through annual performance assessments of standardized test results, end-of-course assessment results, attendance rates, graduation rates, suspension and expulsion rates, closings of charter schools, and the reason for non-renewal of a charter (Pg. e55).

Weaknesses:
No notable weaknesses in this area.

Reader’s Score: 2

2. Competitive Preference Priority 2 - State Support for Charter Schools

(b) Number of Educational Choices through Charter Schools
The extent to which the State demonstrates progress in increasing the number of educational choices for students through the opening of new charter schools, the replication of high-quality charter schools, and the expansion of high-quality charter schools.
Strengths:
The applicant supported its assertion about making significant progress towards increasing educational choices by providing statistics about the number of resources it allocated for start-up, implementation, and technical assistance funding. These resources funded the planning, program design, and initial implementation of dozens of new charter schools (Pg. e21). As a result, the applicant is on track to fund the opening, expansion, and replication of 60 high-quality subgrants across the state (Pg. e58).

Weaknesses:
The applicant did not provide specific criteria for determining the selection of new charter school applications (Pg. e25). The absence of particular standards makes it difficult to determine how new charter school opened under the applicant’s program will be high-quality.

Reader's Score: 1

   (c) At Least One Authorized Public Chartering Agency Other Than a Local Educational Agency (LEA), or an Appeals Process

   The State--
   (1) Allows at least one entity that is not a local educational agency (LEA) to be an authorized public chartering agency for developers seeking to open a charter school in the State; or
   (2) In the case of a State in which LEAs are the only authorized public chartering agencies, the State has an appeals process for the denial of an application for a charter school.

Strengths:
To broaden its partnerships beyond local educational agencies, the applicant allows four-year colleges and universities and the executive office of cities to apply for chartering authority (Pg. e59).

Weaknesses:
No notable weaknesses in this area.

Reader's Score: 2

   (d) High Degree of Autonomy and Flexibility

   The extent to which the State ensures that each charter school receiving funds through the program will have a high degree of autonomy and flexibility, including autonomy over budget, operations, and personnel decisions.

Strengths:
As evidence of the high degree of autonomy and flexibility it allows among the charter schools it funds, the applicant cited the recent “A” rating from the Center for Education Reform, which recognized the state for the absence of charter growth caps, having multiple authorizers, and fair autonomy and accountability for schools (Pg. e59). Lastly, the applicant does not have to have control over the authorizers within the state.
Weaknesses:
There are no notable weaknesses in this area.

Reader's Score: 2

Competitive Preference Priority - Competitive Preference Priority 3

1. Competitive Preference Priority 3 - Novice Applicants

Applicants that have not previously received a grant under the program.

Strengths:
There are no notable strengths in this area.

Weaknesses:
Since the applicant received a State Incentive grant in 2009, it does not qualify for this preference priority.

Reader's Score: 0

Status: Submitted
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