

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

Status: Submitted

Last Updated: 06/26/2017 12:54 PM

Technical Review Coversheet

Applicant: Mississippi Charter School Authorizer Board (U282A170020)

Reader #1: *****

	Points Possible	Points Scored
Questions		
Selection criteria		
Flexibility		
1. Flexibility	10	9
Sub Total	10	9
Selection Criteria		
Objectives		
1. Objectives	15	9
Quality of Eligible Subgrant Applicants		
1. Quality of Subgrant	15	10
State Plan		
1. State Plan	20	18
Parent and Community Involvement		
1. Involvement	10	8
Quality of Project Design		
1. Project Design	15	10
Quality of the Management Plan, Theory of Action		
1. Management Plan	15	8
Sub Total	90	63
Priority Questions		
Competitive Preference Priority 1		
Periodic Review and Evaluation		
1. Review and Evaluation	5	5
Sub Total	5	5
Competitive Preference Priority 2		
Charter School Oversight		
1. Charter School Oversight	5	5
Sub Total	5	5
Competitive Preference Priority 3		
Authorizer other than LEA or Appeal Process		
1. Authorizer other than LEA	2	2
Sub Total	2	2

Competitive Preference Priority 4

Equitable Financing

1. Equitable Financing	2	2
Sub Total	2	2

Competitive Preference Priority 5

Charter School Facilities

1. Charter School Facilities	2	2
Sub Total	2	2

Competitive Preference Priority 6

Best Practices to Improve Struggling Schools/LEAs

1. Struggling Schools	2	2
Sub Total	2	2

Competitive Preference Priority 7

Serving At-Risk Students

1. Serving At-Risk Students	2	2
Sub Total	2	2

Competitive Preference Priority 8

Best Practices for Charter School Authorizing

1. Best Practices	5	4
Sub Total	5	4

Total	125	96
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Technical Review Form

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

Reader #1: *****

Applicant: Mississippi Charter School Authorizer Board (U282A170020)

Questions

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 narrative offers appropriate information to affirm the flexibility offered to charter schools in the state of Mississippi. Pursuant to charter school law, the charter schools and their board of directors are exempt from some of the state mandated requirements. (page e58) That said, charter schools are not subject to regulations of the state board of education and the state department of education. (page e59)

Charter schools have autonomy that is not offered to the traditional public schools. This freedom allows charter school to govern their own academic, financial, and organizational practices. Charter developers can select an educational model that best aligns to the mission. Further, charter schools are exempt from the staffing requirements – only 25% of charter school teachers require certification. Further, principals are not required to have a state certification. However, principals are required to hold a bachelor's degree. Charter schools are not required to participate in the state's salary schedule. (page e58)

Weaknesses:

On page e59 of the proposal, the applicant indicates that its will work to maximize the flexibility provided to charter schools under the state law. However, the specific action that Mississippi Charter Schools Advisory Board will take to further charter flexibility is unclear. The proposal indicates that the MCSB will advocate for the charter school and act as a liaison, but the work that the authorizer will do lack details.

Reader's Score: 9

Selection Criteria - Objectives

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

Strengths:

The applicant has outlined three major objectives that will guide the work outlined in the proposal. On pages e35 to e40 are clear objectives and subsequent activities that the applicant will implement achieve it desired objective. Creating 15,000 new-high quality seats is the first objective (page e34). The second is providing technical assistance to charters designated as A, B in the state's accountability framework (page e37). The third, and final, goal pertains to developing high quality authorizing standards. (pages e39 and e40).

Each of the goals is supported by two or more activities. The activities include, but are not limited to, recruiting high-quality applicants, providing technical support, monitoring the progress toward the sub-grant goals, offering professional development to new and existing charter schools, and assessing authorizing practices. A more in-depth explanation of

the activities is outlined on page e35 through page e40.

Weaknesses:

The information provided in the proposal makes it challenging to determine whether the ambitious objectives outlined are sound and feasible. The first objective is to increase the number of high-quality charter schools. The applicant's plan to increase its charter portfolio by +375% or 15,000 high-quality seats is very ambitious. (page e34) While the plan is clearly defined, the applicant does not provide sufficient data to support the feasibility of the project. The Mississippi Charter Schools Advisory Board (MCSAB) is a new charter school authorizer and has only authorized four charter schools (elementary and middle) that currently serve less than 3,000 students. (page e34) There is no evidence to affirm that the authorizer and its partners are prepared to implement the three objectives with fidelity.

An activity within the first objective is to build a pipeline of high-quality charter developers. While there is a plan to recruit and hire charter developers that are high-quality, this may not be achieved. The Mississippi School Education Accelerator (MSEA) is responsible for leading this work. However, a few of the descriptions outlined on page e126 provide no evidence that the agency is known for recruiting and placing talent. Pages e148 and e149 outline Building Excellent Schools fellowship, but there is no commitment or memorandum of understanding to partner in the work, and there is no guarantee that the partnership will bring talent to Mississippi.

The second objective provides support for charter schools. The proposal lays out an aggressive technical assistance program that will result in professional development for all schools who achieve an A or B on the statewide assessment tool (page e37). On page E38, however, the applicant states that assistance that will be offered to all approved charter schools. The capacity to serve support the technical assistance is a concern.

Reader's Score: 9

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:

To maximize the likelihood that applicants will receive a subgrant, the state has set a standard that will only allow applicants who have already been approved to go through the sub-grant process. Moreover, the state has developed an equally rigorous sub-grant application process. Technical assistance will be provided to all approved applicants who are eligible to complete the sub-grant. Finally, there will be comprehensive oversight to ensure that the grantees are successful. (page e48). The comprehensive charter application process, approval process for the sub-grant, and oversight are detailed on pages e49 to e54 of the proposal.

Weaknesses:

The proposal falls short in clearly articulating the requirements for receiving the sub-grant. Further, the proposal does not provide a detailed plan regarding out-of-state recruiting efforts.

Reader's Score: 10

Selection Criteria - State Plan

- 1. The State entity's plan to--**

- 1) Adequately monitor the eligible applicants receiving subgrants under the State entity's program;**

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

3) Provide technical assistance and support for--

- i. The eligible applicants receiving subgrants under the State entity's program; and**
- ii. Quality authorizing efforts in the State.**

Strengths:

The applicant provides clear evidence regarding its process to provide and support sub-grantees. The sub-grantee focused technical assistance is two-fold. First, the Mississippi Schools Advisory Board will hire a grant coordinator who will be primarily responsible for overseeing the grant. The coordinator owns developing the application and post-award workshops. This individual will also monitor and evaluate the grant and support sub-grantees, when needed (page e54 and e55). MCSAB is responsible for monitoring the sub-grantee. This effort includes: 1) grant compliance, 2) grantees capacity to open charter schools, and 3) academic improvement for students enrolled at the charter school. (page e56) There is also a check-in at the beginning of the planning year, as well as in years one and two. (page e55). The MCSAB will also conduct desk and on-site reviews/audits. (page e56)

The Mississippi Education School Accelerator (MSEA) will provide the sub-grantee with pre-opening and ongoing technical support (page e55). This assistance includes but is not limited to: recruiting, enrollment, governance and fiscal sustainability. (page e38 and e39) Additionally, MSEA and National Association of Charter School Authorizers (NACSA) will support the authorizer. (page e57)

To avoid duplication of efforts among the grantor, grantee, and partners, the proposal outlines the key duties of each stakeholder. On page e56 to e57, there applicant lists the entity and the roles and responsibilities for each partner. The table provides a brief description of each partners' role in the sub-grant process.

Weaknesses:

While the technical assistance plan is robust, staffing to support the plan may be inadequate. The application indicates that the grant coordinator will be hired with six months of receiving the grant. Further, the Executive Director and Deputy Director at MCSAB have yet to start work (estimated time is July). The Executive Director at Mississippi School Education Accelerator will begin working in this capacity (as she is currently employed by Mississippi First) in late 2017. Many of the activities, specifically professional development for aspiring schools, commence in July, extending to January. There is a concern that there may not be sufficient capacity to support the initial phase of the work.

Reader's Score: 18

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 state provides solid evidence on how parent and community feedback will be solicited and considered during charter school implementation. The state's charter school law includes a provision that addresses parent and community involvement in a charter school (page e59). Additionally, on page e60, the applicant indicates that the authorizer will solicit information from parents/community in multiple ways. First, in the sub-grantee application, proposed grantees will be asked to the extent with which the school has involved/engaged parents and community. The school will be asked if/how it received support from parents/community as well as the activities used to assess the demand for the charter school. The authorizer holds public meetings and will be able to assess if the community/parents believe that they had input into the charter development process. Some MCSAB members will attend the public sessions so that they can hear directly from parents. Second, the independent review team will be asked to evaluate the strategies and/or methodology used to gather parent and community support/buy-in. The authorizer will review the feedback as part of the

recommendation report. (page e60)

Weaknesses:

The proposal highlights the plans for soliciting and considering input in the implementation phase, but the application falls short on describing how feedback from parents and community is considered once the school is in operation. Additionally, the application outlines the plan to support an annual survey to solicit concerns, but it does not indicate how the feedback will be used. (pages e60 – e61)

Reader's Score: 8

Selection Criteria - Quality of Project Design

1. The Secretary considers the quality of the design of the State entity's charter school subgrant program, including the extent to which the project design furthers the State entity's overall strategy for increasing the number of high-quality charter schools in the State and improving student academic achievement. In determining the quality of the project design, the Secretary considers the quality of the State entity's process for awarding subgrants for planning, program design, and initial implementation including--

- 1) The subgrant application and peer review process, timelines for these processes, and how the State entity intends to ensure that subgrants will be awarded to eligible applicants demonstrating the capacity to create high-quality charter schools; and**
- 2) A reasonable year-by-year estimate, with supporting evidence, of (i) the number of subgrants the State entity expects to award during the project period and the average size of those subgrants, including an explanation of any assumptions upon which the estimates are based; and (ii) if the State entity has previously received a CSP grant, the percentage of eligible applicants that were awarded subgrants and how this percentage related to the overall quality of the applicant pool.**

Strengths:

The application clearly details the strategic approach and process for awarding the sub-grants. The overarching goal for the state is to increase the number of high-quality charter schools and improve academic outcomes for students. The project design begins with communicating the funding initiative to eligible applications. (page e41). The authorizer will take the lead in building awareness by: 1) emailing approved charter schools and interested applicants; 2) release information to the press about the grant initiative; 3) ensure that future applicants have knowledge of the program; 4) conduct webinars throughout the grant period (at least two per year); and 5) focus on quarterly recruiting. (page e41)

A sub-grant application package will be developed that includes an application, budget, and assurances. On page e42 of the proposal, the applicant highlights the expectations required for the components of the application. For example, there will be an application narrative that includes enrollment projections, roles and responsibilities, feedback from parents, objectives, and performance accountability. For existing charters who want to replication, the non-profit organization must submit three-years of success in advancing student achievement. (page e42) The sub-grant will also include competitive priorities.

The budget narrative of the sub-grant will include expenditure details and how the grant funds will be used to improve outcome. The quality assurances will be submitted with the budget narrative. (page e43).

The proposal outlines an evaluation process that includes a peer review from evaluators that have industry experience. The evaluator will be from the department of education, MSF, and local education agencies. To ensure that each evaluator is prepared to support the initiative, training will be provided. The training will assist the team with norming on the rubric and post scoring discussions. This process commences with MCSAB who conducts a completeness check for all sections to ensure that the application meets the authorizer's standard. The application will then be reviewed by three evaluators. MCSAB will conduct a final review to determine budget and preference scores. (page e44).

Overtime, the sub-grant program will yield 15 grant approvals. (page e46). The applicant explains the assumptions used to determine how many grants that authorizer intends to award over the five-year period. (page e46). Funds (a maximum of \$900,000) will be distributed over a three-year period.

Weaknesses:

The applicant does not provide a clear explanation of assumptions used to support the funding to be awarded to the sub-grantee. The applicant will award grant dollars up to \$900,000 over a three-year period, however, the application does not provide a rationale that supports the funding amount or the funding period. It would be helpful if the proposal indicated that the funding assumptions are aligned to resources required in the planning, opening, and implementation phases.

Funding estimates are based on enrollment numbers multiplied by the CSP allotment maximum per seat. The proposal includes an estimated enrollment of 100 students per year; however, the applicant did not provide data to support the assumption. (page e47) Additionally, the applicant does not align the distributions to an estimated number of administrators with the resources required to support a start-up school. Further, the applicant should consider providing and explaining guidelines (i.e., annual minimums and maximums) so that charter applicants can understand to support start up initiatives. If a school opens with 300 students in year one, the grant is maxed out in what would be considered the planning year.

Reader's Score: 10

Selection Criteria - Quality of the Management Plan, Theory of Action

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

- 1) The quality, including the cohesiveness and strength of reasoning, of the "logic model" (as defined in this notice), and the extent to which it addresses the role of the grant in promoting the State-level strategy for using charter schools to improve educational outcomes for students through CSP subgrants for planning, program design, and initial implementation and other strategies;**
- 2) The extent to which the State entity's project-specific performance measures, including any measures required by the Department, support the logic model; and**
- 3) The adequacy of the management plan to--**
 - i. Achieve the objectives of the proposed project on time and within budget, including the existence of clearly defined responsibilities, timelines, and milestones for accomplishing project tasks; and**
 - ii. Address any compliance issues or findings related to the CSP that are identified in an audit or other monitoring review.**

Strengths:

The applicant provides a theory of action involves expanding high-quality charter school, particularly to educationally disadvantaged students, and improve the student outcomes in the schools. (page e62). The logic model on pages e146 to e147 include the inputs, activities, outputs, outcomes, and impact for the project objectives that are described throughout the application. Pages e62 to e69 detail the performance targets data collected for each objective and activity. The explanations are appropriate, and the expectations (i.e., number of individuals impacted by the activity and/or timing to receive the data) are reasonable.

The management plan (page e70 to e73) provides a brief biography of each team member who will be responsible for leading the efforts. The milestones, timelines, and individual responsible for completing the task are detailed and clear to understand. If tasks transition to new hires (i.e., executive director, MCSAB to grant coordinator), then the change is appropriately identified. (page e73 to e75)

Sub-grantees are evaluated annually by the authorizer, who will note non-compliance when identified. The sub-grantee is also required to submit a corrective action plan (page e75). The grant coordinator will track the progress of non-compliant schools, which must show progress toward improvement. (page e75)

As evidenced on pages e259 to e274, the budget is reasonable and allocates over 90% of the funding to increasing high

quality seats to 15,000 over the next five-years.

Weaknesses:

The applicant requested funds to support a high-quality charter school portfolio. However, the long-term goal is to increase academic achievement by only five percent annually. (page e146) Given the population the applicant wants to serve, this metric appears to be low, which may not result in high performing charter schools. Some, but not all performance measures are quantitative in nature. The applicant will not have a metric to determine if the goal was successfully met. (i.e., the number of charter schools and students will increase annually)

Reader's Score: 8

Priority Questions

Competitive Preference Priority 1 - Periodic Review and Evaluation

- 1. To meet this priority, an applicant must demonstrate that the State provides for periodic review and evaluation by the authorized public chartering agency of each charter school at least once every five years, unless required more frequently by State law, and takes steps to ensure that such reviews take place. The review and evaluation must serve to determine whether the charter school is meeting the terms of the school's charter and meeting or exceeding the student academic achievement requirements and goals for charter schools as set forth in the school's charter or under State law, a State regulation, or a State policy, provided that the student academic achievement requirements and goals for charter schools established by that policy meet or exceed those set forth under applicable State law or State regulation. This periodic review and evaluation must include an opportunity for the authorized public chartering agency to take appropriate action or impose meaningful consequences on the charter school, if necessary.**

Strengths:

The applicant provides strong evidence that confirms the state's periodic review and evaluation of charter schools. State law requires the charter authorizer, Mississippi Charter School Advisory Board (MCSAB), to annually monitor performance metrics included in the charter school's contract. The charter authorizer is responsible for assessing criteria aligned to Mississippi's Charter School Performance Framework (MCSPF). This evaluative tool examines a school's progress towards academic and financial performance as well as legal and contractual compliance. Annual reports are made available to the board of directors at the charter school and the general public. (page e25)

If the annual reports reveal that a charter school is not meeting a performance metric, the MCSAB will take action. The authorizer's infractions align to consequences the intervention process outlined in the MCSPF. (page e25) Consequences include but are not limited to revocation. (e26).

Charter schools are subject to a comprehensive renewal process that commences one year prior to the charter agreement's expiration date (i.e., in year four of five). The review will result in either a renewal or non-renewal of the charter agreement. (page e26).

Weaknesses:

No weaknesses are noted.

Reader's Score: 5

Competitive Preference Priority 2 - Charter School Oversight

1. To meet this priority, an application must demonstrate that State law, regulations, or other policies in the State where the applicant is located require the following:

a) That each charter school in the State--

1. Operates under a legally binding charter or performance contract between itself and the school's authorized public chartering agency that describes the rights and responsibilities of the school and the authorized public chartering agency;
2. Conducts annual, timely, and independent audits of the school's financial statements that are filed with the school's authorized public chartering agency; and
3. Demonstrates improved student academic achievement; and

b) That all authorized public chartering agencies in the State use increases in student academic achievement for all groups of students described in section 1111(c)(2) of the ESEA (20 U.S.C. 6311(c)(2)) as one of the most important factors when determining whether to renew or revoke a school's charter.

Strengths:

The proposal provides strong evidence which demonstrates the following: 1) assurance of legally binding contractual agreements; 2) examination of financial statements; and 3) validation of improved student performance. Charter schools are required to enter into legally binding charter agreements. Academic, financial, and operational performance metrics are embedded in the contractual agreement. The authorizer is responsible for examining the mutually agreed upon expectations over the five-year charter term. (page e26)

As stated above, charter schools are required to meet financial obligations that are codified in the state statute. Annually, charter schools must have its financial statements examined and reported on by either a state auditor or a certified public accountant. (page e26)

Charter schools are required to demonstrate academic achievement. As part of the charter agreement, charter schools must set annual student performance benchmarks. The authorizer is responsible for assessing these performance metrics annually. The Mississippi Charter School Advisory Board is responsible for assessing student performance based on academic proficiency, growth, proficiency gaps, and graduation rates, if applicable. To ensure that the charter school is advancing achievement for all students, performance metrics are evaluated for the following subgroups: 1) English Language Learners; 2) race; 3) gender; 4) economically disadvantaged; 5) diverse learners; and 6) gifted. Student attendance, retention, and behavior data are indicators that are also monitored and evaluated. At the end of the charter term, the authorizer uses evidence from the annual performance frameworks to determine whether the charter school be renewed. (page 27)

Weaknesses:

No weaknesses are noted.

Reader's Score: 5

Competitive Preference Priority 3 - Authorizer other than LEA or Appeal Process

1. To meet this priority, the applicant must demonstrate that the State--

- a) Provides for one authorized public chartering agency that is not an LEA, such as a State chartering board, for each individual or entity seeking to operate a charter school pursuant to State law; or
- b) In the case of a State in which LEAs are the only authorized public chartering agencies, allows for an appeals process for the denial of an application for a charter school.

Note: In order to meet this priority under paragraph (b) above, the entity hearing appeal must have the authority to approve the charter application over the objections of the LEA.

Strengths:

The applicant had clearly demonstrated that this criterion has been met. The state's charter school law, enacted in 2013, identifies the body that governs charter school. The Mississippi Charter Schools Authorization Board is the sole authorizer for the state. (page e27)

Weaknesses:

No weaknesses noted.

Reader's Score: 2

Competitive Preference Priority 4 - 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 demonstrates that the state provides equitable financing for charter schools. On page e28 of the proposal, the applicant asserts that charter schools receive funding that is equal to the funding provided to traditional public school. Charter schools receive state funding through the Mississippi Adequate Education Program, which is consistent with all public schools. All schools, charter and public, are allotted funding on a per-pupil basis. Scheduled payments are consistent with the traditional public schools.

Local funding is distributed from the home district of the enrolled student. The Department of Education is responsible for calculating the payment. The local district must send the charter school the funding. Consequences are levied for local school districts who fail to release payments. (page e28)

Charter schools are their own local education agency. As such, the schools can receive federal funding. Department staff partner with Mississippi Charter School Authorizer Board to ensure approved charter schools are knowledgeable about applying for federal funds. Representatives from the charter school and Mississippi Charter School Authorizer Board meet with the Department's staff in federal programs and special education, who provide a detailed overview of specific federal program applications, such as Title funding and IDEA. (page e29)

Weaknesses:

No weaknesses are noted.

Reader's Score: 2

Competitive Preference Priority 5 - 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 offered several viable alternatives in which charter developers can acquire facilities for their schools. The statute provides charter schools with facility rights (page e28); and on page 29 of the proposal, the applicant explains that charter schools can secure dollars from a statewide facilities fund, which is consistent with what is provided to traditional schools. Charter schools can also bargain for reasonable pricing (i.e., at or below fair market value) with other government agencies (i.e., school districts, colleges, etc.), for-profit, and not-for profit organizations for facility use. Additionally, the applicant states that charter schools can purchase shuttered traditional public schools, as well as available space near the charter school's location, and conversion schools can lease or buy the building. (page e30).

Weaknesses:

The proposal does not explain how a charter school can leverage the dollars from the statewide facilities fund. (page e29). The applicant also indicates that state law permits charter schools to have access to public facilities. The applicant lists venues which the charter school can use (i.e., museums, performing arts venues, theaters, etc.). Public access to facilities for this criterion is regards to the 'physical plant' or home of a charter school rather than facilities that charter school can visit.

Reader's Score: 2

Competitive Preference Priority 6 - Best Practices to Improve Struggling Schools/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**

Strengths:

The applicant provides adequate information which confirms that states dissemination of charter school promising practices. On page e30, the applicant describes a newly formed department, the Achievement School District (ASD), which will focus on providing assistance to low performing public schools. The application explains that ASD staff will leverage charter school best practices to assist in turning around struggling schools. (page e31)

Further, the Mississippi Charter Schools Advisory Board will seek and support sub-grant applicants who use charter school advice to improve struggling schools. The Mississippi Education Accelerator (MSEA) will provide sub-grant applicants with technical assistance during the application and post approval process. (page e31)

The examples are clear evidence that support how the state plans to use charter school best practices to assist with improving some of the state's struggling schools.

Weaknesses:

While it is evident that ASD will leverage promising practices from charter schools to assist with supporting failed schools, the proposal does not explain how the state will support schools who are not part of the ASD network

Reader's Score: 2

Competitive Preference Priority 7 - 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:

On page e31 of the proposal, the applicant provides clear details that demonstrate the supports provided to charter schools that serve students identified as 'at risk.' As noted previously, charter schools are provided flexibilities under the law. One of the flexibilities outlines how charter schools provide educational services to students who are failing or at risk for failing. The authorizer has a protocol to monitor initiatives that focus on students who are failing or have failed. The performance framework on page e144 highlights the indicators that will be assessed. All programs must meet the state standards. (page e31)

The state's department of education also offers schools relevant professional development on strategies for serving at-risk. The proposal also addresses what the state plans to do to support charter schools that focus on drop-out prevention and recovery, including building a framework that intentionally assesses schools that serve students from alternative populations. (page e32).

The state's charter school application also includes a component that requires applicants to detail how they plan to serve students how are at risk for failing (page e246).

Weaknesses:

No weaknesses noted.

Reader's Score: 2

Competitive Preference Priority 8 - 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 proposal offers strong evidence that supports how the state has taken steps to move toward high-quality authorizing. First, the state of Mississippi has aligned its charter law, adopted in 2013, to high-quality charter authorizing standards. Enhancing the state's charter law has been nationally recognized. The National Association of Charter School Authorizers (NACSA) has ranked Mississippi's charter school law eighth in the nation. (page e33) Second, the law mandates that the authorizer has systems that are aligned to high-quality authorizing standards (page e33). MSCAB has developed Several processes, protocols, and assessment tools that are aligned to best practices in quality authorizing. The protocols include but are not limited to a comprehensive evaluation process that includes capacity interviews. Last, the Mississippi Charter School Advisory Board has evaluated its own practices, and developed policies to be implemented in future. A comprehensive list of the improvements is outlined on page e170.

The Mississippi Charter School Advisory Board (MCSAB) has also delineated funds in the budget narrative that will be allocated to further the authorizing work. Pages e265 to e266 highlight the state's efforts to engage the National Association of Charter School Authorizers in the development of an authorization evaluation tool. In addition to this work, MCSAB will use non-CSP grant funding to implement the evaluation tool, support additional authorization work (i.e., applications), and provide other technical assistance.

MCSAB will also contract with Mississippi First, who will provide technical assistance to guide and strengthen the authorizer's policies and procedures. This work includes, but is not limited to, examining, interpreting, and actualizing protocols. (page, e57)

Weaknesses:

While the proposal includes a list of improvements on page e170, the applicant does not provide a timeline that details when the policies and or protocols will be established.

Reader's Score: **4**

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Authorizer other than LEA or Appeal Process		
1. Authorizer other than LEA	2	2
Sub Total	2	2

Competitive Preference Priority 4

Equitable Financing

1. Equitable Financing	2	1
Sub Total	2	1

Competitive Preference Priority 5

Charter School Facilities

1. Charter School Facilities	2	1
Sub Total	2	1

Competitive Preference Priority 6

Best Practices to Improve Struggling Schools/LEAs

1. Struggling Schools	2	1
Sub Total	2	1

Competitive Preference Priority 7

Serving At-Risk Students

1. Serving At-Risk Students	2	1
Sub Total	2	1

Competitive Preference Priority 8

Best Practices for Charter School Authorizing

1. Best Practices	5	4
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Total	125	92
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Technical Review Form

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

Reader #2: *****

Applicant: Mississippi Charter School Authorizer Board (U282A170020)

Questions

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:

Mississippi's charter school law has an automatic waiver clause, which means that charter schools are exempt from "any rule, regulation, policy, or procedure adopted by the State Board of Education or the State Department of Education" (p. e59). The applicant lists specific areas where charters receive waivers, including choosing curriculum, hiring staff, principal qualifications, and salaries. Charter schools are also LEAs, and therefore have more autonomy over receiving federal funding and managing their special education programs (p. e59). The authorizer serves as an advocate for the schools with the SEA to ensure that their flexibilities and autonomy are preserved.

Weaknesses:

While charters do have automatic waivers from most rules and regulations, there is a stipulation in the law that a school would have to adhere to a policy if it is "otherwise required by the authorizer or in the charter contract" (p. e59). This caveat can lessen the flexibility available to charter schools because the authorizer's contract could overrule the exemption explicit in the statute.

Reader's Score: 8

Selection Criteria - Objectives

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

Strengths:

The applicant very thoroughly articulates their three objectives for their charter school program, and lists specific activities to help achieve each objective. The focus of two objectives is to increase the number and quality of charter schools in Mississippi (p. e34). With the charter sector in its infancy, it is reasonable for Mississippi to focus their goals on growth and improving the overall quality of charter schools in the state. Partnerships have already been fostered with strong organizations that work with charter school leaders, such as Building Excellent Schools (p. e35), and with new partners like CMO's who have strong charter school networks in other states.

Sound reasoning is used to justify the importance of a subgrant program because startup funds in the state are very difficult to find for charters, putting them at a disadvantage from the very beginning (p. e36). It is also reasonable to use some of the funds to hire a Grants Coordinator at the Mississippi Charter School Authorizer Board, the state authorizer, to manage the subgrant competition from start to finish (p. e37). Additionally, focusing on refining the opening checklist for charter schools and making sure they have technical assistance and training is important to help engage charter leaders and allow leaders to focus on academics (p. e38).

Weaknesses:

The goal for opening charter schools seems to be very ambitious and will be difficult to meet. The charter law was passed in 2013, and currently there are only three schools operating (p. e38) with one more approved to open. Adding 15 schools in five years does not seem feasible based on the length of time it has taken to open three schools, and the state and the Mississippi Charter School Authorizer Board (MCSAB) are still developing partnerships with high-quality CMOs. In addition, according to the state charter law, if a school district is rated A, B, or C, there are additional requirements, including a school board vote to approve the school, which could impede progress (p. e101).

There is no data provided for Objective 2 to ascertain the feasibility of whether all charters could earn either an A or B grade or improve their performance by two letter grades during the length of the grant. The applicant identifies policies and procedures that will be finalized to help meet the third objective of quality authorizing, but does not give a timeline so it is unclear if these policies will all be finalized during the length of the grant (p. e41). It is also unclear how the applicant would define success for Objective 3, which is to move up in the National Association for Charter School Authorizers (NACSA) national authorizer ranking.

Reader's Score: 9

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 comprehensively explains the charter school application and approval process, which will ensure that charter schools of a higher standard will open in the state. There is a multi-level approval process, which includes a Letter of Intent, an application that various people review at the authorizing agency, and interviews of charter applicants (p. e51-e53). The subgrant application is also very detailed and contains three components – narrative, budget and budget narrative, and assurances (p. e42). The explanation on page e46 provides evidence of how the state authorizer will use data from past application cycles and past numbers of high-quality applicants to engage applicants, increasing the likelihood of success for subgrantees. Existing operators applying for a charter must submit evidence of their performance record, which will help to ensure that high-quality schools will be applying for the subgrant as well.

Weaknesses:

This section focuses more on the charter school grant application process, and does not provide as many details about the contents of the subgrant application. The attached subgrant application in Appendix F does not contain specifics about what is required in the application beyond general section titles and while score ranges are given in the appendix, it is unclear how subgrantees will be evaluated on the quality of the application.

Reader's Score: 10

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 state authorizer will monitor the subgrantees in a variety of ways to ensure that they are meeting the objectives outlined previously in this application. A combination of desk monitoring and on-site school monitoring will be used (p. e55) to measure the progress of schools more cost-effectively, particularly around finances and operations.

A thorough chart is included in the CSP application to show which state entities are responsible for which activities to eliminate the duplication of work (p. e56-e57). This list is also shared with the partners, who sign a memorandum of understanding to clearly explain the scope of work for each organization.

Money from the CSP grant will be used to hire a Grant Coordinator (p. e54), who will be in charge of managing all technical assistance for sub-grantees. The individual in this role will develop a variety of workshops and tools beginning prior to the application deadline, and running through the length of the grant for the subgrantee winners.

The state authorizer has partnered with a state and national organization to provide support to monitor quality charter school authorizing. Goals for these partnerships are to create an annual authorizer evaluation and develop policies and procedures (p. e58).

Weaknesses:

The CSP monitoring plan is divided into three objectives listed on page e55; however, the monitoring plan does not specifically address each one. The applicant discusses in detail the plan to monitor the fiscal compliance and sustainability of subgrantees, but offers fewer specifics on the type of academic data a subgrantee is required to submit for the state to measure their academic progress throughout the grant period. In addition, there is no discussion on the follow up or on any consequences subgrantees would receive if they failed to meet the educational needs of their students, as outlined in the subgrantee agreement.

Reader's Score: 16

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:**

Parent and community input on the implementation and operation of charter schools in Mississippi is a key component of the application process. For example, public hearings, that the Mississippi Charter School Authorizer Board (MCSAB) attends, are held to solicit feedback on proposed charter school applicants. Also, applicants must describe how they will work to engage the local community, create family-school partnerships, and develop community resources (p. e60). Peer reviewers of applicants must assess whether effective strategies are being used to encourage parent involvement (p. e60). Mississippi First (MSF) surveyed parents and community members beginning in November 2016 to understand their opinions about Mississippi charters (p. e61) and this feedback will be used to shape the creation of future charter schools.

Weaknesses:

It is unclear exactly how the applicant will use parent feedback solicited by the Mississippi First (MSF) in the survey, or what the timeline is to develop the "community complaint process", or how that feedback will be utilized.

Reader's Score: 9

Selection Criteria - Quality of Project Design

1. The Secretary considers the quality of the design of the State entity's charter school subgrant program, including the extent to which the project design furthers the State entity's overall strategy for increasing the number of high-quality charter schools in the State and improving student academic achievement. In determining the quality of the project design, the Secretary considers the quality of the State entity's process for awarding subgrants for planning, program design, and initial implementation including--

- 1) The subgrant application and peer review process, timelines for these processes, and how the State entity intends to ensure that subgrants will be awarded to eligible applicants demonstrating the capacity to create high-quality charter schools; and
- 2) A reasonable year-by-year estimate, with supporting evidence, of (i) the number of subgrants the State entity expects to award during the project period and the average size of those subgrants, including an explanation of any assumptions upon which the estimates are based; and (ii) if the State entity has previously received a CSP grant, the percentage of eligible applicants that were awarded subgrants and how this percentage related to the overall quality of the applicant pool.

Strengths:

The application process explained is very detailed. First, the various ways to promote the subgrantee application process will help to ensure that all potential applicants know about the program and also receive any technical assistance prior to applying (p. e42). The application requirements are logical, and mandate that applicants address their academics, enrollment, operations, financial plan, and school-level project objectives and performance measures (p. e42). In addition, replication applications must also prove that their schools are improving academics for students, not remaining at status quo.

The state will award preference points to subgrantees that want to open high schools, rural schools, or turn around failing schools, or to those who want to open schools in LEAs with a large number of failing schools (p. e43). These priorities ensure that students with the most need will benefit from charters. The peer review training and application review process is detailed (p. e44-45). The timeline proposed for the subgrant application is feasible (p. e45).

The number of subgrants that will be awarded was derived using data from the past few years in Mississippi (p. e46) and the subgrant application process will focus on rewarding high-quality schools and high-quality pipelines. The average size of each grant, \$900,000 (p. e48) makes sense based on their rationale provided. There were no subgrants awarded in previous years.

Weaknesses:

The application points out that only subgrant applications with a score of 90 or above will receive an award. However, it is not clear what happens if no one scores above a 90. Based on the information provided in this application, no one would receive a subgrant for that year (p. e45). Peer reviewers are limited to only those from "MDE, MSF and LEAs" (p. e44), but there is no rationale provided to explain why peer reviewers are defined by where they work, and not their qualifications to serve as a reviewer.

While the total subgrant amount makes sense, based on information in the application about the difficulty in finding start up money for charter schools prior to their opening, it would seem more logical to give subgrantees more money in the pre-opening year, as opposed to basing it on enrollment, which would essentially give more money towards the end of the grant.

Reader's Score: 10

Selection Criteria - Quality of the Management Plan, Theory of Action

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

- 1) The quality, including the cohesiveness and strength of reasoning, of the "logic model" (as defined in this notice), and the extent to which it addresses the role of the grant in promoting the State-level strategy for using

schools to improve educational outcomes for students through CSP subgrants for planning, program design, and initial implementation and other strategies;

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

3) The adequacy of the management plan to--

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

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

Strengths:

The narrative that accompanies the logic model is very detailed and explains how each performance target was created based on prior experience and data from previous charter school application cycles in Mississippi (p. e62). There is additional information on what data will be collected and how to show that performance targets are being met (p. e63-69).

The logic model itself (p. e146-147) is focused and clearly explains all of the necessary inputs, outputs and impact, both long-term and short-term. The outcomes, if met will help Mississippi reach its overall project goals of increasing the number of charters in the state, while also increasing their academic quality.

The management plan is cohesive and thorough and the breakdown of staff and their responsibilities is useful when looking at the logic model (p. e70-72). In addition, the chart on page e73 clearly delineates job responsibilities and activities within a sound timeline.

Compliance issues will be addressed by subgrantees signing an award letter, and the annual charter school evaluation will identify any lack of compliance, enabling the school and state authorizer to rectify swiftly (p. e75).

Weaknesses:

While current proficiency rates in Mississippi are low and a five percent annual increase seems reasonable, reaching a 35.6% math proficiency and a 41.3% ELA proficiency at the end of the grant period seems low based on the applicant's stated intent to solicit high-quality applicants (p. e68).

Additionally, the mid-term and long-term outcomes are the same for all three objectives, and there is no quantifiable measure for some. For example, it is unclear how many charter schools will earn a "B" or higher grade by the third year of operation. Objective 3 is to advance Mississippi's standing as a national leader in quality authorizing, but the applicant does not make clear how the long-term outcomes to improve charter students' proficiency and have charter schools earn a state grade of B or is directly related to Objective 3. The logic model would be stronger if mid-term and long-term outcomes were more directly tied to each of the three objectives.

There are also concerns about the management team, because the application indicates that many of the staff members who will manage the CSP grant and subgrants are in the process of being hired right now (p. e70). The Grants Coordinator, which is a new position, will be hired in 2017, but there is no specific timeline, and this position will be responsible for administering all parts of the CSP grant. Without this person hired, the Executive Director of the Mississippi Charter School Authorizer Board (MCSAB), will take on the Grant Director's duties in addition to her regular responsibilities, which could be burdensome.

Reader's Score: 10

Priority Questions

Competitive Preference Priority 1 - Periodic Review and Evaluation

- 1. To meet this priority, an applicant must demonstrate that the State provides for periodic review and evaluation by the authorized public chartering agency of each charter school at least once every five years, unless required**

frequently by State law, and takes steps to ensure that such reviews take place. The review and evaluation must serve to determine whether the charter school is meeting the terms of the school's charter and meeting or exceeding the student academic achievement requirements and goals for charter schools as set forth in the school's charter or under State law, a State regulation, or a State policy, provided that the student academic achievement requirements and goals for charter schools established by that policy meet or exceed those set forth under applicable State law or State regulation. This periodic review and evaluation must include an opportunity for the authorized public chartering agency to take appropriate action or impose meaningful consequences on the charter school, if necessary.

Strengths:

As the application clearly illustrates, charter school contracts are five years in length, and according to Mississippi Code 37-28-33, schools receive a comprehensive review prior to the expiration and must include academic, finance and operational data. The Mississippi Charter School Performance Framework (p. e25) outlines what the authorizer reviews when evaluating charter schools. In addition to the five-year review, there is an annual performance and legal compliance review. The authorizer is allowed to take "appropriate corrective actions or exercise sanctions" in response to a school's performance review (p. e25).

Weaknesses:

No weaknesses found.

Reader's Score: 5

Competitive Preference Priority 2 - Charter School Oversight

1. To meet this priority, an application must demonstrate that State law, regulations, or other policies in the State where the applicant is located require the following:

a) That each charter school in the State--

- 1. Operates under a legally binding charter or performance contract between itself and the school's authorized public chartering agency that describes the rights and responsibilities of the school and the authorized public chartering agency;**
- 2. Conducts annual, timely, and independent audits of the school's financial statements that are filed with the school's authorized public chartering agency; and**
- 3. Demonstrates improved student academic achievement; and**

b) That all authorized public chartering agencies in the State use increases in student academic achievement for all groups of students described in section 1111(c)(2) of the ESEA (20 U.S.C. 6311(c)(2)) as one of the most important factors when determining whether to renew or revoke a school's charter.

Strengths:

Mississippi Code 37-28-21 mandates that charters operate under a "legally binding charter between themselves and the Mississippi Charter School Authorizer Board (MCSAB) (p. e26) that defines academic and operational expectations for the length of the charter term. The Code also requires annual financial audits and each school must file the report with the MCSAB, their authorizer. The required performance framework includes academic achievement measures, such as growth, graduation rates, and achievement gap closures between major subgroups (p. e27). Renewal decisions must be ground in evidence that the school met their performance targets specified in their charter contract, including subgroup absolute proficiency and growth and disaggregated data (p. e27). Student academic achievement is one of the most important factors when determining whether to renew or revoke a charter based on the provided data on page e27.

Weaknesses:

No weaknesses found.

Reader's Score: 5

Competitive Preference Priority 3 - Authorizer other than LEA or Appeal Process

1. To meet this priority, the applicant must demonstrate that the State--

- a) Provides for one authorized public chartering agency that is not an LEA, such as a State chartering board, for each individual or entity seeking to operate a charter school pursuant to State law; or
- b) In the case of a State in which LEAs are the only authorized public chartering agencies, allows for an appeals process for the denial of an application for a charter school.

Note: In order to meet this priority under paragraph (b) above, the entity hearing appeal must have the authority to approve the charter application over the objections of the LEA.

Strengths:

There is only one authorizer in Mississippi, which is not an LEA. The Mississippi Charter School Authorizer Board (MCSAB) is a statewide authorizing entity that was created by the Mississippi Public Charter Schools Act of 2013 (p. e27). Since it is not an LEA, an appeals process is not required.

Weaknesses:

No weaknesses found.

Reader's Score: 2

Competitive Preference Priority 4 - 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 Mississippi Code states that charter schools should receive state, local, and federal financing equal to traditional schools, and the applicant details how state funding is sent to charter schools at the same level and at the same time as traditional schools (p. e28). Charter schools are LEAs (p. e28), and therefore are eligible for all federal funds, and the state has a complete process identified to notify and train staff at charters about how to access federal funding (p. e28-29).

Weaknesses:

The applicant states that "charter schools also receive a proportional share of local funds (p. e28)"; however, that does not explicitly mean they are receiving an equal amount of funds to traditional public schools.

Reader's Score: 1

Competitive Preference Priority 5 - 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:

Mississippi's charter law ensures that charter schools and traditional public schools receive state dollars for facilities in a similar way (p. e30). There are other ways that the state provides charters with access to facilities, including the right of first refusal to purchase or lease buildings, and negotiating and leasing at-or-below fair market value for use of facilities (p. e30).

Weaknesses:

It is unclear if some of the access, including negotiating below fair market value and the right of first refusal is guaranteed in law or if it is up to the discretion of districts. The applicant also notes that charter schools have access to public facilities, such as libraries, museums, and performing arts venues (p. e30), but it is not clear why this is relevant to this section. The applicant does not talk about providing charter schools the ability to share in bonds or mill levies.

Reader's Score: 1

Competitive Preference Priority 6 - Best Practices to Improve Struggling Schools/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**

Strengths:

Mississippi's charter school law was passed in 2013, so they are in the process of developing a plan as to how to use best practices from charter schools in other states. The Achievement School District (ASD) is based on an existing model, and will continue to use best practices in chartering (p. e31). There are plans to begin more concrete sharing of best practices in Fall 2017.

Weaknesses:

The applicant provided some information about how Mississippi will use best practices to help improve "struggling schools", but did not offer enough specific activities or a timeline. There are no specific examples of how Mississippi has shared best practices to improve schools or how the Achievement School District will use and share best practices in the future.

Reader's Score: 1

Competitive Preference Priority 7 - 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:

State charter schools have flexibility to design their curriculum and programming as they see fit to benefit at-risk students (p. e31), as long as they meet Mississippi standards. Provisions in the law allow for charter schools to focus on dropout prevention and recovery models (p. e32).

Weaknesses:

The applicant provides no specific data about how charters are working with at-risk students. There is also no evidence that the state currently supports students in these programs.

Reader's Score: 1

Competitive Preference Priority 8 - 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 Mississippi Charter School Authorizer Board (MCSAB), the state authorizer, uses the National Association of Charter School Authorizer's (NACSA) principles and standards for quality authorizing, and employs the same charter school application review process that NACSA recommends (p. e33). NACSA will also be creating an authorizer evaluation tool during the grant period to review MCSAB's process (p. e265).

Weaknesses:

There are no specific examples in the application of how Mississippi will share best practices to improve charter school authorizing throughout the state.

Reader's Score: 4

Status: Submitted
Last Updated: 06/26/2017 12:54 PM

Status: Submitted

Last Updated: 06/26/2017 12:54 PM

Technical Review Coversheet

Applicant: Mississippi Charter School Authorizer Board (U282A170020)

Reader #3: *****

	Points Possible	Points Scored
Questions		
Selection criteria		
Flexibility		
1. Flexibility	10	9
Sub Total	10	9
Selection Criteria		
Objectives		
1. Objectives	15	9
Quality of Eligible Subgrant Applicants		
1. Quality of Subgrant	15	10
State Plan		
1. State Plan	20	17
Parent and Community Involvement		
1. Involvement	10	9
Quality of Project Design		
1. Project Design	15	10
Quality of the Management Plan, Theory of Action		
1. Management Plan	15	10
Sub Total	90	65
Priority Questions		
Competitive Preference Priority 1		
Periodic Review and Evaluation		
1. Review and Evaluation	5	5
Sub Total	5	5
Competitive Preference Priority 2		
Charter School Oversight		
1. Charter School Oversight	5	5
Sub Total	5	5
Competitive Preference Priority 3		
Authorizer other than LEA or Appeal Process		
1. Authorizer other than LEA	2	2
Sub Total	2	2

Competitive Preference Priority 4

Equitable Financing

1. Equitable Financing	2	2
Sub Total	2	2

Competitive Preference Priority 5

Charter School Facilities

1. Charter School Facilities	2	1
Sub Total	2	1

Competitive Preference Priority 6

Best Practices to Improve Struggling Schools/LEAs

1. Struggling Schools	2	1
Sub Total	2	1

Competitive Preference Priority 7

Serving At-Risk Students

1. Serving At-Risk Students	2	1
Sub Total	2	1

Competitive Preference Priority 8

Best Practices for Charter School Authorizing

1. Best Practices	5	4
Sub Total	5	4

Total	125	95
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Technical Review Form

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

Reader #3: *****

Applicant: Mississippi Charter School Authorizer Board (U282A170020)

Questions

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:

Mississippi state law affords significant flexibility to charter schools. According to the Miss. Code Ann. 37-28-45, state law pertaining to public schools is not applicable to charter schools unless specifically stated. Therefore, charters experience increased flexibility in hiring, licensure requirements, salary schedules, procurement, and expenditures. The applicant explains that each charter school is its own LEA and is governed by an autonomous board of trustees. As such, charter schools fall outside the auspices of local district policy requirements. Further, the Mississippi Charter School Authorizer Board (MCSAB) maximizes flexibility by serving as an advocate for all charters within the state (p.38-39).

Weaknesses:

The application does not demonstrate how the applicant will maximize the flexibility afforded by state law. The response would be strengthened if it included a description of the technical assistance MCSAB intends to provide to schools to help them understand the law and the rights the law affords them.

Reader's Score: 9

Selection Criteria - Objectives

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

Strengths:

The proposal details three unique measurable objectives, each of which builds on the brief work of the charter sector in Mississippi and creates ambitious targets for growth. The first objective sets a growth target of 15,000 (375%) additional high-quality charter school seats in the state. To ensure the quality of these new charters, the second objective aims for all schools to earn an "A" or "B" rating on the annual state accountability metric or, if failing, at least improve two letter grades by their fourth year of operations. The third objective sets a goal for the state authorizer, the Mississippi Charter School Authorizer Board (MCSAB), to continue striving towards excellence as measured by improved standing on the National Alliance of Charter School Authorizers' (NACSA) state policy ranking. The corresponding activities in all three objectives detail a well-organized plan towards achieving the objectives within the CSP grant period (p.14-21).

Weaknesses:

The application lacks convincing data to explain the rationale behind the target set forth in objective one. There is little evidence to demonstrate that the MCSAB has the capacity to open 15 new schools in five years, given that they have only opened three schools since charter schools were approved in 2013. Similarly, the applicant did not provide data to explain where schools currently fall on the A-F accountability framework, and if an expectation that all charter schools will earn an A or B is realistic. Further, the third objective to "advance MCSAB's standing as a national leader in authorizing quality, as demonstrated by NACSA's state policy rankings" is not quantifiable. It does not state by how much MCSAB must advance in the NACSA rankings in order to satisfy this goal.

Reader's Score: 9

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:

Mississippi will use two primary methods of recruitment to ensure that the state will increase the number of high-quality charters moving forward (p.15). First, the Mississippi Charter School Authorizer Board (MCSAB) will recruit from a pipeline of high-quality charter operators. Second, MCSAB will partner with leadership pathways that cultivate experienced leaders to run charter schools.

The MCSAB will use a multi-tiered review process to ensure subgrantee quality, which consists of a review by staff followed by a review by a cohort of peer reviewers. Before applying for a CSP subgrant, an applicant must complete a robust and comprehensive charter application process. This serves as the primary step the MCSAB takes to vet subgrantees completely (p.24-25, p.31-33).

The subgrantee competition will also prioritize four areas for charter development: high schools, of which there are none currently; rural schools, also none currently; under-performing areas; and turnaround operators. These priorities help to ensure that high-quality charter seats are going to the students who need it most.

Weaknesses:

The description of the subgrantee vetting process focuses heavily on the charter application process and provides little detail about the subgrantee application process.

The proposal acknowledges the difficulty in attracting CMOs from outside the state, but it provides limited detail about how it will specifically attract these high-performing CMOs beyond offering the startup and implementation funds available through the CSP competition (p.2).

Reader's Score: 10

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 state presents a plan that take steps to educate and prepare subgrantees for successful implementation, while also ensuring that they are held accountable. In order to set schools up for success, the Mississippi Charter School Authorizer Board (MCSAB) will provide two types of technical assistance: one to help subgrantee applicants navigate the application

process and the other to help schools flourish once chartered. Since many of the subgrantees may be new charter entities that lack experience with federal grants, the SEA is investing in a Grants Coordinator who will provide pre-application and post-approval technical assistance to subgrantees. (p. 34-35)

The Mississippi Education Accelerator (MSEA) will also provide ongoing trainings on operational best practices such as enrollment, discipline, and facilities (p.19). The state's comprehensive monitoring program dictates that each school will be monitored annually using both desk and on-site monitoring tactics. This combined approach decreases the burden on schools by giving them time to prepare data and reports in advance of onsite visits. The state also takes careful steps to decrease any duplicative reporting by delineating each entity's roles and responsibilities and how each will engage with a CSP subgrantee. Since MCSAB is the sole authorizer, duplication in reporting appears minimal at most. (p.35-38)

Weaknesses:

The CSP would be the first federal grant for charter schools in Mississippi. Although the proposal outlines a plan for implementation, much of the infrastructure for managing the grant would be new. For example, the MCSAB plans to hire a Grants Coordinator to oversee "all aspects of administering federal grant funding under the MCSAB's CSP." However, this person has not been identified and the search for a person with federal grants management experience could be challenging in Jackson, MS.

The monitoring plan was designed to assess subgrantees' progress in three categories; however, the plan lacks a description of how this progress will be measured. The plan provides a description of desktop monitoring in regard to fiscal best practices, but its explanation is limited in regard to how the staff will ensure that subgrantees are appropriately spending their \$900,000 allotment in the timeframe allotted. Further, there is no detail about the recourse the MSCAB will take if subgrantees are not meeting academic, operational, or fiscal objectives tracked through the monitoring plan.

Reader's Score: 17

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:

Mississippi details a concerted effort to incorporate the voices of parents and community members at the application and implementation stage of the chartering process. At the application stage, feedback is collected through open forums and through detailed activities required as a component of charter applications. Once a charter is granted, schools are encouraged to include members of the community, including parents, on their board. The Mississippi Charter School Authorizer Board (MCSAB) is also in the process of refining a satisfaction survey and developing a community complaint process to ensure that parents and community members have a safe and secure way to share feedback on local charter schools. (p.39-41)

Weaknesses:

The application presents a comprehensive overview of how the MCSAB will collect feedback; however, it is unclear how they will apply the feedback to improve the charter sector.

Reader's Score: 9

Selection Criteria - Quality of Project Design

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

project design, the Secretary considers the quality of the State entity's process for awarding subgrants for planning, program design, and initial implementation including--

- 1) The subgrant application and peer review process, timelines for these processes, and how the State entity intends to ensure that subgrants will be awarded to eligible applicants demonstrating the capacity to create high-quality charter schools; and
- 2) A reasonable year-by-year estimate, with supporting evidence, of (i) the number of subgrants the State entity expects to award during the project period and the average size of those subgrants, including an explanation of any assumptions upon which the estimates are based; and (ii) if the State entity has previously received a CSP grant, the percentage of eligible applicants that were awarded subgrants and how this percentage related to the overall quality of the applicant pool.

Strengths:

The project timeline is aligned with the state authorizing schedule. The CSP competition launches when new charter applications are awarded. This alignment ensures that all new charters will have the opportunity to apply for funds to support their planning year. This is a priority for the state, as charters in Mississippi do not currently have access to local funds in their planning year. In order to maximize support for the development of high-quality charter schools, subgrantees will receive the highest possible allotment of \$900,000 (p.21-24).

The application process involves several best practices. For example, multiple stages of review prevent a subgrantee with significant weaknesses from winning an award, and a peer review component ensures that those with the best knowledge of the charter school sector in Mississippi evaluate the effectiveness of the proposals. Mississippi has not previously received a CSP grant; therefore, this criterion does not need to be addressed.

Weaknesses:

The proposal provides a year-by-year estimate of the number of subgrants, but there is insufficient evidence to show that these projections are appropriate. Since charters have only been in operation in Mississippi since 2013, there is little data on which to base these estimates. Mississippi proposes to incrementally increase the number of charters, which increases the chance of high-quality schools by providing resources to new operators in their planning year. (p.26)

Since state funds are not available during the planning year, this funding is paramount to an operator's ability to open a new school. Although funding is limited at the nascent stage, the applicant plans to distribute CSP funding in three equal amounts. Funding would be more effective if a larger portion was distributed upfront to support start-up costs.

The application process sets a minimum threshold of 90 points in order for a subgrantee applicant to advance to the second phase of the review process. There is no explanation provided to explain what MCSAB will do if no subgrantees score above 90 points.

Reader's Score: 10

Selection Criteria - Quality of the Management Plan, Theory of Action

1. **The Secretary considers the quality of the management plan and the project's theory of action. In determining the quality of the management plan and the project's theory of action, the Secretary considers the following factors:**
 - 1) **The quality, including the cohesiveness and strength of reasoning, of the "logic model" (as defined in this notice), and the extent to which it addresses the role of the grant in promoting the State-level strategy for using charter schools to improve educational outcomes for students through CSP subgrants for planning, program design, and initial implementation and other strategies;**
 - 2) **The extent to which the State entity's project-specific performance measures, including any measures required by the Department, support the logic model; and**
 - 3) **The adequacy of the management plan to--**
 - i. **Achieve the objectives of the proposed project on time and within budget, including the existence of clearly defined responsibilities, timelines, and milestones for accomplishing project tasks; and**
 - ii. **Address any compliance issues or findings related to the CSP that are identified in an audit or other monitoring review.**

Strengths:

The proposal includes a detailed timeline (p.53-55), logic model (p.64-65), and performance measures (p.42-49), which are aligned with each other and position the state to increase the number of high-quality charter schools during the CSP grant period. The timeline clearly delineates how progress will be gauged through milestones, and identifies which member of the team is responsible for leading each milestone. The management plan sufficiently outlines the team's roles and responsibilities, and the proposed members are qualified to lead the implementation of the CSP grant as evidenced by their bios and resumes.

In addition, the budget narrative is extensive and details how each expenditure supports the project objectives (p.258-274). Mississippi has not received a CSP grant in the past; therefore, it does not need to address previous compliance issues.

Weaknesses:

For Objective 2, Performance Measure 2.3, the applicant uses baseline data to set academic performance targets for growth in reading and math. Although the baseline data show that student proficiency is low in both subject areas, 5% annual growth would only lead to 35.6% proficiency in math and 41.3% proficiency in reading. Five percent growth with final targets at less than 50% is not rigorous, nor does it reflect proficiency rates for schools deemed to be "high-quality" (p.48).

Moreover, many of the mid and long-term outcomes listed in the logic model are not quantifiable and will therefore be challenging to measure. For example, for Objective 1, a mid-term objective states that the "number of charter schools and students will increase annually," but it does not include a specific number. In addition, for that same objective, a long-term outcome states that the "charter schools will earn a school grade of a "B" or higher by the third year of operation." This outcome does not include a number or percentage of schools (p.64-65).

Reader's Score: 10

Priority Questions**Competitive Preference Priority 1 - Periodic Review and Evaluation**

- 1. To meet this priority, an applicant must demonstrate that the State provides for periodic review and evaluation by the authorized public chartering agency of each charter school at least once every five years, unless required more frequently by State law, and takes steps to ensure that such reviews take place. The review and evaluation must serve to determine whether the charter school is meeting the terms of the school's charter and meeting or exceeding the student academic achievement requirements and goals for charter schools as set forth in the school's charter or under State law, a State regulation, or a State policy, provided that the student academic achievement requirements and goals for charter schools established by that policy meet or exceed those set forth under applicable State law or State regulation. This periodic review and evaluation must include an opportunity for the authorized public chartering agency to take appropriate action or impose meaningful consequences on the charter school, if necessary.**

Strengths:

The proposal demonstrated that the applicant adequately meets this Competitive Preference Priority by stating that the Mississippi Charter School Authorizer Board (MCSAB) uses the Mississippi Charter School Performance Framework (MCSPF) to evaluate schools annually. Miss. Code Ann 37-28-31 requires the board to take corrective action if a school does not meet its goals, which is implemented through the Intervention Ladder and Notice of Concern process. This includes revocation, if necessary. Charters are granted for five years, and the renewal process starts a year before the contract ends. (p.5-6)

Weaknesses:

No weaknesses identified.

Reader's Score: 5

Competitive Preference Priority 2 - Charter School Oversight

1. To meet this priority, an application must demonstrate that State law, regulations, or other policies in the State where the applicant is located require the following:

a) That each charter school in the State--

1. Operates under a legally binding charter or performance contract between itself and the school's authorized public chartering agency that describes the rights and responsibilities of the school and the authorized public chartering agency;

2. Conducts annual, timely, and independent audits of the school's financial statements that are filed with the school's authorized public chartering agency; and

3. Demonstrates improved student academic achievement; and

b) That all authorized public chartering agencies in the State use increases in student academic achievement for all groups of students described in section 1111(c)(2) of the ESEA (20 U.S.C. 6311(c)(2)) as one of the most important factors when determining whether to renew or revoke a school's charter.

Strengths:

The Mississippi Charter School Authorizer Board (MCSAB) demonstrates that it is the sole authorizer in the state, set forth by Miss Code Ann 37-28-31. The Law requires that schools operate under a legally binding contract that defines the relationship between the authorizer and the school and outlines the performance measures against which the school will be measured (p.6). The Law also requires all charter schools to conduct an annual financial audit (p.7). The Mississippi Charter School Performance Framework (MCSPF) reviews a school based on students' academic achievement (overall and by major subgroup), financial health and practices, and compliance. The MCSPF includes an analysis of student achievement by subgroup. The MSCAB uses the MCSPF to evaluate student academic performance when a school is up for a review or renewal. Increases in student achievement for all groups of students is one of the most influential factors the MSCAB uses in determining charter renewal or revocation. (p.7).

Weaknesses:

No weaknesses identified.

Reader's Score: 5

Competitive Preference Priority 3 - Authorizer other than LEA or Appeal Process

1. To meet this priority, the applicant must demonstrate that the State--

a) Provides for one authorized public chartering agency that is not an LEA, such as a State chartering board, for each individual or entity seeking to operate a charter school pursuant to State law; or

b) In the case of a State in which LEAs are the only authorized public chartering agencies, allows for an appeals process for the denial of an application for a charter school.

Note: In order to meet this priority under paragraph (b) above, the entity hearing appeal must have the authority to approve the charter application over the objections of the LEA.

Strengths:

The Mississippi Charter School Authorizer Board (MSCAB), an independent charter board, is the sole authorizer of charter schools in the state (p. 7-8). Since the MSCAB is not an LEA, this applicant meets this Competitive Priority Preference.

Weaknesses:

No weaknesses identified.

Reader's Score: 2

Competitive Preference Priority 4 - 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:

Mississippi uses a variety of mechanisms to ensure equitable funding for charters. All public schools, including charters, receive government funding through the Mississippi Adequate Education Program (MAEP). In addition to equitable per pupil allotments, charter schools receive a proportional share of local funds based on the percent of residents that attend their school. Further, since charters are their own LEA, they are eligible for federal funds, and the MDE provides training for charter leaders on how to access those funds (p.8-9).

Weaknesses:

No weaknesses identified.

Reader's Score: 2

Competitive Preference Priority 5 - 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 demonstrates that Mississippi state law provides charter schools with protections around access to and funding for facilities in three primary ways. First, charter schools are eligible to receive state funding for facilities, and their allotment is determined using the same formula as traditional public schools. Second, charter schools may work with local school districts, colleges/universities, and any other non-profit or for-profit entity to negotiate or lease a facility for use as a school. Third, charter schools are given the right of first refusal to purchase or lease a shuttered public school building within their local district at-or-below fair market value. (p.9-10)

Weaknesses:

The proposal makes several statements about ways in which the state supports charter schools' access to facilities and facilities funding, but it could make a stronger case with increased detail. For example, the applicant states that there is a statewide facility fund, but it does not explain how charter schools can access those funds. Further, the application states that charter schools have the right of first refusal, but it does not cite the legal statute or provide the law in the appendices.

Reader's Score: 1

Competitive Preference Priority 6 - Best Practices to Improve Struggling Schools/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

Strengths:

The applicant partially demonstrated an appropriate response to this Competitive Preference Priority. Mississippi's primary approach to helping failing schools is through the creation of the Achievement School District (ASD). The ASD is tasked with "transforming persistently failing public schools and districts through the state into quality education institutions" through its authority to take over any school that received an "F" rating two years in a row. Moving forward, schools seeking to turn around these failing schools will receive preference by the Mississippi Charter School Authorizer Board (MSCAB) and Mississippi Education Accelerator MSEA. (p. 10-11)

Weaknesses:

The proposal does not detail how the ASD will use best practices to turnaround failing schools. There is little detail provided about the ASD beyond its authority and reporting structure.

Reader's Score: 1

Competitive Preference Priority 7 - 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:

Charter school law in Mississippi provides a supportive landscape for schools to serve at-risk students. Schools are allowed flexibility in the design of their programs, as long as they meet the Mississippi College and Career-Readiness Standards, and secondary schools are also given the option for students to satisfy graduation requirements through competency-based learning. The Mississippi Charter School Authorizer Board (MCSAB) is in the process of designing an alternative school performance framework to align with program designs for at-risk youth, and the department of education provides specific technical assistance focused on working with at-risk students (p.11-13).

Weaknesses:

Although the proposal discusses how the law supports the development of charters that serve at-risk students, it does not provide any specific data on the impact of programs developed as a result of this flexibility.

Reader's Score: 1

Competitive Preference Priority 8 - 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:

Mississippi uses a single authorizer, the Mississippi Charter School Authorizer Board (MSCAB), whose practices are in line with nationally recognized best practices, as mandated by state law (Miss Code Ann 37-28-17). Even though charter schools in Mississippi only began in 2013, the MSCAB has already been recognized nationally for its implementation of best practices. The National Association of Charter School Authorizers (NACSA) ranked the state 8th on its 2016 State Policy Report, and the National Association of Public Charter Schools ranked the state 10th for overall quality. (p.13)

The applicant demonstrates its commitment to continuous improvement through its work with NACSA by committing

dedicated funding for technical assistance and the development of an authorizer evaluation tool in its proposed budget. Additionally, Performance Framework and Closure policies are strong and identify that there is more work to be done. (p. e264-265)

Weaknesses:

The applicant lacks sufficient detail on how NACSA will “advise and support” the MSCAB (p.13). Moreover, there is no explanation about the types of technical assistance NACSA will provide or a timeline for implementation.

Reader's Score: **4**

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